MONTANA
Department of Transportation

Malcolm "Mack" Long, Director

2701 Prospect ▪ PO Box 201001
Helena MT 59620-1001

February 28, 2022

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

Subject: 2021 Small MS4 Annual Report: Individual Permit Number MT0031844

Dear Mr. Kenning:

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.

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 2021, MDT filled environmental staff vacancies and continued ongoing improvements in support of the MS4 program. Of note, MDT would like to highlight the following major achievements accomplished this past year:

- Developed a Data Management Plan that describes MS4-related data expected to be acquired or generated and how that data will be managed, described, analyzed, and stored;

- Conducted an internal MS4 training event for environmental personnel to assist new staff in becoming familiar with program requirements;
- Finalized outfall inventory guidance and MS4 mapping update procedures;
- Completed baseline outfall and inlet mapping data collection efforts for all MS4s;
- Initiated dry well and other storm water conveyance mapping data collection efforts;
- Completed Illicit Discharge Detection and Elimination (IDDE) program improvements, including development of an IDDE Investigation and Corrective Action Plan (CAP), an Enforcement Response Plan (ERP), an Illicit Discharge Incident Report form, and updates to MDT's Outfall Visual Assessment form;
- Finalized and distributed Plans, Specification, and Estimate review guidance for projects located in MS4s;
- Finalized Facility Pollution Prevention Plan (FPPP) update procedures and initiated updates to each of MDT's existing FPPPs and associated inspection checklists for facilities located in MS4s;
- Solicited public participation by requesting input to MDT's statewide Storm Water Management Program (SWMP) through news releases and social media posts;
- Developed a storm water program feedback form to document input from the public and MDT staff during training and public outreach events;
- Hosted multiple internal meetings with MDT environmental personnel to review each Minimum Control Measure and associated measurable goals and identify suggested revisions to MDT's SWMP;
- Initiated updates to MDT's SWMP;
- Coordinated with MDT Maintenance personnel regarding potential improvements to tracking permanent BMP maintenance actions; and
- Coordinated with MDT Hydraulics to initiate updates to MDT's Low Impact Development (LID) analysis form to capture requirements for evaluating runoff reduction.

Additionally, MDT is continuing to evaluate potential MS4 program improvements. For 2022, several initiatives have been identified as follows:

- Finalize the SWMP revisions initiated in 2021 with additional input from the public;
- Provide training for MDT environmental personnel on implementation of IDDE investigation and CAP, ERP, MDT SWMP, and MS4 mapping data collection procedures;
- Provide training for MDT maintenance personnel on site-specific FPPP implementation;
- Plan training for MDT pre-construction personnel on Permanent Erosion and Sediment Control (PESC) and LID design components;
- Identify high priority areas and outfalls in accordance with IDDE CAP;
- Establish protocols for identifying high-priority post-construction storm water management controls and develop an inspection frequency determination protocol based upon assigned priority;
- Refine and update MS4 maps to include high priority designations and other pertinent mapping layers;
- Continue mapping data collection efforts for other storm water conveyances;
- Reconcile newly collected outfall data with historic data;
- Update MDT's external and internal MS4 websites;
- Investigate possibility of developing an online reporting tool specific to IDDE and storm water construction complaints;
- Prioritize funding with MDT Maintenance for implementation of additional Best Management Practices (BMP) at MDT facilities located in MS4s;

- Continue evaluation of MDT's Maintenance Manuals and tracking systems for incorporation of MS4 operations and maintenance requirements;
- Coordinate with MDT Hydraulics to formalize processes associated with runoff reduction requirements for post-storm water management controls and finalize the LID analysis form;
- Evaluate storm water discharge monitoring program requirements to determine how MDT can comply with anticipated future permit requirements; and
- Create a yearly tracking calendar to facilitate MS4 management and oversight.

Please find attached an original signature copy of the 2021 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
	William Fogarty	Butte District Administrator
	Jim Wingerter, P.E.	Great Falls District Administrator
	Rod Nelson, P.E.	Billings District Administrator
	Justun Juelfs	Kalispell Maintenance Chief
	Steve Felix	Missoula Maintenance Chief
	Kyle DeMars	Bozeman Maintenance Chief
	Jim Pesanti	Butte Maintenance Chief
	Harry Barnett	Great Falls Maintenance Chief
	Tom Tilzey	Billings Maintenance Chief
	John Schmidt, P.E.	Missoula District Construction Engineer
	Geno Liva, P.E.	Butte District Construction Engineer
	Rich Hibl, P.E.	Great Falls District Construction Engineer
	Mike Taylor, P.E.	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
	Dave Hedstrom, 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

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 2021

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 201001

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 2

MS4 Annual Report for Calendar Year 2021

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 201001

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 4

MS4 Annual Report for Calendar Year 2021

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 201001

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 5

MS4 Annual Report for Calendar Year 2021

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 59901 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 201001

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 6

MS4 Annual Report for Calendar Year 2021

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 201001

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 2021

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 201001

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 2021

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 201001

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 2021

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 45.821742 Longitude -108.414288

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 201001

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	# 1	Non-compliance reporting

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?
2 - See App. O

11. Of those illicit discharges/illegal connections that have been discovered or reported, how many have been eliminated? One has been eliminated.

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	**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 19, 2022, 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 2022 *General Permit for Storm Water Discharges Associated with Small Municipal Separate Storm Sewer Systems* (MDEQ, 2022), 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	No
		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:

- MDT's Adopt-a-Highway Program;
- Implementation of individual MDT Facility Pollution Prevention Plans (FPPPs);
- Adherence to MDT's Roadway/Roadside Maintenance Program;
- Implementation of good housekeeping measures at construction sites and MDT maintenance facilities;
- Use of erosion and sediment controls at MDT construction sites;
- Illicit discharge screening of MDT outfalls; and
- General storm water awareness.

Section E. Public Education and Public Participation

E.4. In 2021, MDT solicited public input to its existing Storm Water Management Program (SWMP) through MDT's public involvement process. This process included a press release to all MS4s, social media posts, an announcement in MDT's Newsline publication, a dedicated webpage on MDT's website requesting SWMP feedback, and a notice to the MS4 working group participants. MDT will be revising its SWMP in 2022 and intends to public notice the revised document for 30-days 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 in order 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 2021.

MS4 AREA	ACTIVE CONSTRUCTION SITES ≥1 ACRE IN 2021	NO. CONSTRUCTION SITES INSPECTED IN 2021
MTR040001 (BILLINGS)/MTR040010 (YELLOWSTONE CO)	2	5
MTR040002 (BOZEMAN)	1	1
MTR040004 (GREAT FALLS)	2	2
MTR040005 (KALISPELL)	3	3
MTR040006 (BUTTE)	1	1
MTR040007 (MISSOULA)	3	10
MTR040009 (HELENA)	1	1

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 2019. 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. 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 2021.

MS4 AREA	2021 TOTAL OUTFALLS	2021 NO. OF MAJOR OUTFALLS	2021 NO. OF MINOR OUTFALLS	NO. SCREENED IN 2021
MTR040001 (BILLINGS)	17	7	10	13
MTR040002 (BOZEMAN)	22	9	13	4
MTR040004 (GREAT FALLS)	25	3	22	0
MTR040005 (KALISPELL)	19	8	11	5
MTR040006 (BUTTE)	21	0	21	4
MTR040007 (MISSOULA)	35	9	26	11
MTR040009 (HELENA)	8	3	5	0
MTR040010 (YELLOWSTONE CO)	18	2	16	4

The number of 2021 outfalls listed above have been carried over from the previous year's MS4 Annual Report as dry weather screening was conducted for previously designated outfalls. In 2021, MDT updated and completed mapping of MS4 outfalls statewide using procedures outlined in MDT's *MS4 Outfall Inventory Guidance*. Currently, this new list of outfalls is undergoing quality control checks. The new list, once verified, 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 will be 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 will finalize the FPPP updates in 2022 and offer 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. These FPPPs are currently being updated and will be finalized in 2022.

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.

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 2021 in support of the MS4 program and include the following:

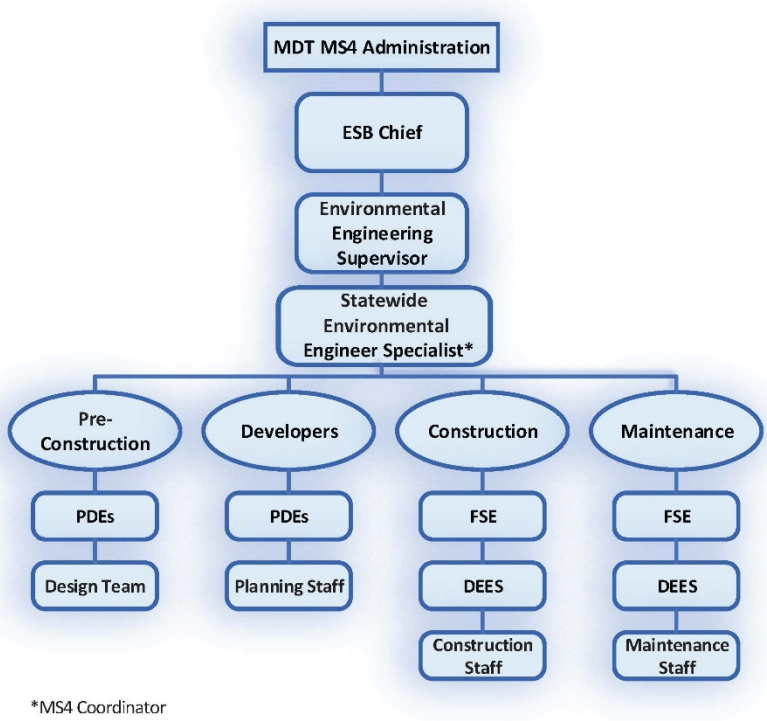
- Developed a Data Management Plan that describes MS4-related data expected to be acquired or generated and how that data will be managed, described, analyzed, and stored;
- Conducted an internal MS4 training event for environmental personnel to assist new staff in becoming familiar with program requirements;
- Finalized outfall inventory guidance and MS4 mapping update procedures;
- Completed baseline outfall and inlet mapping data collection efforts for all MS4s;
- Initiated dry well and other storm water conveyance mapping data collection efforts;
- Completed IDDE program improvements, including development of an IDDE Investigation and CAP, an ERP, an Illicit Discharge Incident Report form, and updates to MDT's Outfall Visual Assessment form;
- Finalized and distributed Plans, Specification, and Estimate review guidance for projects located in MS4s;
- Finalized FPPP update procedures and initiated updates to each of MDT's existing FPPPs and associated inspection checklists for facilities located in MS4s;
- Solicited public participation by requesting input to MDT's statewide SWMP through news releases and social media posts;
- Developed a storm water program feedback form to document input from the public and MDT staff during training and public outreach events;
- Hosted multiple internal meetings with MDT environmental personnel to review each Minimum Control Measure and associated measurable goals and identify suggested revisions to MDT's SWMP;
- Initiated updates to MDT's SWMP;
- Coordinated with MDT Maintenance personnel regarding potential improvements to tracking permanent BMP maintenance actions; and

- Coordinated with MDT Hydraulics to initiate updates to MDT's LID analysis form to capture requirements for evaluating runoff reduction.

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.

This updated chart deviates slightly from the one found in MDT's 2014 SWMP. MDT hired a SEES to perform the Statewide MS4 Coordinator's duties listed in the SWMP. The SEES will take over the development and publishing of public outreach messages in 2022 that was previously being managed by the Environmental Engineering Section Supervisor.

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.



APPENDIX N

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

SWMP Activity or Component Name	**Printed Media BMP-PEO-01**	**Web Sites and Social Media Sites BMP-PEO-02**	**Public Events BMP-PEO-03**
Minimum Control Measure Name (If Applicable)	Public Education and Outreach on Storm Water Impacts	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	II.B.1
Brief Description of Planned SWMP Action Taken	Make printed media available to the public.	Post storm water specific information on MDT online sources including MDT Intranet, MDT internet, and Facebook.	To reach target audiences by providing or sponsoring presentations in schools and universities, conferences, retirement communities, civic clubs, libraries, businesses, and association meetings.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, Public Info Officer, DEES	MDT, MS4 Coordinator, Environmental Engineering Section Supervisor	MDT, MS4 Coordinator, Public Info Officer, DEES
Development of SWMP Item Completed and/or In Effect (Yes/ No)	Yes	Yes	Yes
Measurable Goal or Performance Standard Utilized	MDT will track, in a spreadsheet, the printed media types that were generated, the number of brochures, pamphlets, and other printed media distributed as well as the dates and locations where the printed media was handed out. At the end of the permit period, the MS4 Coordinator will compile the information recorded. MDT will distribute 5% more printed educational material than the prior year. A MS4 related article will post once a year in MDT's Rail, Transit & Planning Division newsletter the 'Newsline'. ***Note:*** *As discussed in previous Annual Reports, MDT is focusing less on printed material and more on Social Media interactions. This BMP is being phased out.*	This BMP will be measured by several means. First, the amount of feedback received from the Montana MS4 website, which has a link to allow comments to be emailed to MDT. The MDT MS4 Coordinator will post at least four status updates related to storm water, water quality, and other MS4 issues on the MDT social media site (i.e. Facebook) each year. This BMP will be measured by the number of subscribers to the MDT site and by the "likes" and "comments" associated with the posts. ***Note:*** *As discussed in previous Annual Reports, the MontanaMS4 website was discontinued in 2015 to focus on the MDT webpages, and the responsibility to develop social media posts was transitioned from the MS4 Coordinator to the Environmental Engineering Section Supervisor in 2016. Beginning in 2022, social media posts will be transitioned to the Statewide Environmental Engineering Specialist.*	MDT's Statewide MS4 Coordinator will participate in at least one public event each year to promote the Statewide MDT MS4 Program. In addition, the DEES will attend at least one public event each year to promote the storm water management program efforts in each MS4 area. Events may include storm water conferences, Storm Water Awareness Week, Montana State Fair, local Science Fairs, Earth Day, educational booths and presentations at schools and universities. MDT will track the number of events attended by MDT personnel, the date and location of events, and if possible, the number of event participants. The information will be compiled at the end of the permit period to determine its effectiveness for educating the public. ***Note:*** *As discussed in previous Annual Reports, the Statewide MS4 Coordinator's participation in public outreach events was discontinued in 2016 since it was duplicative of the DEES' efforts.*

SWMP Activity or Component Name	**Guidance Manuals and Educational Materials BMP-PEO-04.1**	**Guidance Manuals and Educational Materials BMP-PEO-04.2**	**Public Forums BMP-PPI-01**	**Clean-up and Volunteer Events BMP-PPI-02**
Minimum Control Measure Name (If Applicable)	Public Education and Outreach on Storm Water Impacts	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.1	II.B.2	II.B.2
Brief Description of Planned SWMP Action Taken	Make a variety of guidance manuals and educational materials accessible through the MDT website.	Work with the MDT Librarian to create a collection of stormwater materials available for education and training.	Provide the public the opportunity to comment on storm water concerns through project public meetings, public notices, National Environmental Policy Act (NEPA) and Montana Environmental Policy Act (MEPA) process, and corridor study process.	Adopt-A-Highway is statewide program administered by MDT 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, MS4 Coordinator, DEES	MDT, MS4 Coordinator	MDT, MS4 Coordinator, DEES, public information personnel	MDT, Adopt-A-Highway program manager, MS4 Coordinator
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	Yes	Yes	Yes
Measurable Goal or Performance Standard Utilized	A link will be added to MDT Stormwater pages to take the user to MDT's guidance and educational manuals. The first measurable goal will be to perform an annual review by the MS4 Coordinator of the internal and external MDT websites to verify that the links to the reference materials are accurate and up to date.	The second measurable goal will be completed by the MS4 Coordinator. This measurable goal is to work with the MDT librarian once per year to review MDT's educational materials related to storm water. This review will consist of verifying that the materials available at the MDT library are accurate, adequate, and up to date. New materials will then be acquired as needed and allowed by budgetary constraints.	Compliance with NEPA and MEPA (including required public involvement) is confirmed through audits. The results of these audits will be used to track this BMP throughout the permit period.	MDT will continue to offer the Adopt-A-Highway program. MDT's current goal for this BMP is to work with the Adopt-A-Highway program manager to assist in creating the ability for statewide consistent compliance tracking by the end of the 2015 permit cycle. The compliance tracking will be able to keep track of which sections of roadways by reference posts are adopted, who has adopted them, and how often trash pickup is occurring.

SWMP Activity or Component Name	**Feedback** **BMP-PPI-03**	**Storm Water System Mapping** **BMP-IDDE-01**
Minimum Control Measure Name (If Applicable)	Public Involvement/ Participation	Illicit Discharge Detection and Elimination (IDDE)
General Permit Condition Item Number (If Applicable)	II.B.2	II.B.3
Brief Description of Planned SWMP Action Taken	The public can provide feedback using several different methods. MDT will address this feedback and incorporate the feedback where appropriate.	A statewide effort to map MDT's storm water system.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, other MDT Staff as applicable	MDT, MS4 Coordinator, DEES
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	No – BMP is partially complete. Outfall and inlet mapping as well as some other storm water conveyance mapping was completed in 2021. Mapping of open channels, subsurface conduits/pipes, and other similar storm water conveyances is ongoing.
Measurable Goal or Performance Standard Utilized	On MDT's social media sites, the MS4 Coordinator will make at least four announcements per year. MDT will continue to solicit feedback through work group discussions, website comments, phone calls, written e-mails or letters, training evaluations, surveys, public comment periods, and personal interactions. The MS4 Coordinator will use a spreadsheet to keep track of the amount, and type of feedback received. The MS4 Coordinator will evaluate the BMPs progress based on the amount and type of feedback received via available sources. The MS4 Coordinator will use the feedback received to create updates and revisions to the storm water program on an as needed basis to increase the amount of feedback and public interaction received. ***Note:*** *The responsibility to develop social media posts was transitioned from the MS4 Coordinator to the Environmental Engineering Section Supervisor in 2016. Beginning in 2022, social media posts will be transitioned to the Statewide Environmental Engineering Specialist.*	The DEES will continue to provide on-the-ground mapping data and the Statewide MS4 Coordinator will continue to update each Small MS4 storm water system map on an annual basis and will make the updated maps available in electronic format upon request. These Small MS4 maps will be available online in 2014. MDT will solicit information from cities and counties to ensure that the information is as accurate as possible. MDT will also share new project information with co-permittees upon request. Updates include areas of new development or infrastructure improvements, as well as those areas where new information becomes available during maintenance activities. In addition, MDT will revise the Small MS4 boundaries based on city limit changes and census information on a yearly basis if these two items have changed. This BMP's success will be based on the Small MS4 maps being updated with new information, and 25% of inlets being mapped in 2014. Over the permit cycle starting in 2015 MDT will collect and map our inlets, open channels, and subsurface conduits/pipes, dry wells, and other similar storm water conveyances.

SWMP Activity or Component Name	**Dry Weather Screening BMP-IDDE-02**	**Storm Water Ordinances BMP-IDDE-03**
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	Monitoring of outfalls within the MDT jurisdiction by use of both dry weather screening and visual observation.	MDT will follow local ordinances, statutes, and regulations within the Small MS4s. MDT will notify the proper enforcement authority available in the select Small MS4 that has an existing storm water ordinance in place.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES, FSE, Maintenance Staff	MDT, MS4 Coordinator, DEES, construction inspectors
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	Yes
Measurable Goal or Performance Standard Utilized	The DEES is responsible for performing the dry weather screening at each outfall once per permit cycle. The information they gather will be used to update both the dry weather screening form along with the tracking spreadsheet in 2015. The IDDE Program protocols will be made available on the MDT website. The number of illicit or illegal discharges reported to the MS4 Coordinator will be analyzed and compared to previous years. MDT will also track the date, the outfall location, the response action, and the outcome of the implementation of such actions. Success of this BMP will be to eliminate 100% of illicit or illegal discharges from MDT operations. ***Note:*** *In 2021, MDT updated the dry weather screening process to better evaluate outcomes. The new process is documented in MDT's IDDE Investigation and Corrective Action Plan. The Outfall Visual Assessment form was updated for dry weather screening, and an Illicit Discharge Incident Reporting form was created to better track investigation and follow-up for illicit discharges. Training on the processes will be completed in 2022.*	Because MDT does not have legal authority to establish ordinances, it will rely on other governmental bodies to add ordinances and regulation to the existing standards that help eliminate illicit or illegal discharges into state water bodies. For applications within the Small MS4, MDT will continue to list in right of way approach and encroachment permits that applicants are expected to follow local ordinances, which include the city MS4 ordinances. As part of this measurable goal, MDT will follow applicable ordinances, and report non-compliance to the appropriate authorities. MDT will evaluate the local agreements with co-permittees at the end of this permit cycle. In addition, MDT will continue to follow the *Escalation Plan* spelled out in Management memo 03-01 that is available in electronic format on the MDT websites. ***Note:*** *In December 2021, MDT finalized its IDDE Investigation and Corrective Action Plan and Enforcement Response Plan.*

SWMP Activity or Component Name	**Public Education on IDDE** **BMP-IDDE-04**	**Training** **BMP-IDDE-05**
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	MDT currently provides information on possible illicit and illegal discharges in our printed education material. MDT will continue to provide this information.	Provide district personnel with IDDE training specific to their job duties.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, other MDT staff	MDT, MS4 Coordinator, DEES
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	Yes
Measurable Goal or Performance Standard Utilized	MDT will track, when possible, the number of calls, emails, or postings on MDT's social media sites. Information provided during the reporting will be entered into a tracking spreadsheet. The action taken by MDT to resolve the problem will also be included in the spreadsheet. When available, MDT will record how the information was acquired. MDT will use this information to evaluate the highest used method of reporting. Reporting methods not being used will be evaluated to determine if changes can be made to improve its effectiveness. The number of reports will determine if having a public reporting system is effective. The results will be presented in each Annual Report. As stated in BMP 3.3.1.2, the MS4 Coordinator will be posting status updates on MDT's social media (Facebook) page. One of these posts will be related to IDDE. ***Note:*** *The responsibility to develop social media posts was transitioned from the MS4 Coordinator to the Environmental Engineering Section Supervisor in 2016. Beginning in 2022, social media posts will be transitioned to the Statewide Environmental Engineering Specialist. In addition, starting in 2020, MDTs Instagram page is also used to post MS4 information.*	This training will be part of the IDDE Training Program and will be performed annually for key personnel. MDT will track the date, location and employees trained each year as part of the IDDE Training Program at each Small MS4. Success will be determined by ensuring up to date training material and employees requesting the training receive the training.

SWMP Activity or Component Name	**Construction SWPPP BMP-CSRC-01**	**MDT Environmental and Construction Oversight BMP-CSRC-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	At construction sites that are required to obtain an MPDES General Permit for Storm Water Discharges associated with Construction Activity, the contractors must prepare a SWPPP.	To provide environmental and construction oversight on MDT projects. To ensure compliance with federal, tribal, state, and local laws.
Responsible Agency, Department, or Organization; and Person or Position	MDT, PDE	MDT, DEES, project personnel
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	Yes
Measurable Goal or Performance Standard Utilized	MDT continues to place the special provision in project contracts that require contractors on construction sites larger than or equal to 1 acre of disturbance to adhere to the MPDES General Permit for Storm Water Discharges associated with Construction Activity. The measurable goal for the BMP is that project contracts have the MPDES Special Provision. ***Note:*** *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.*	This BMP will be measured by the number of inspections conducted during the permit period. In addition, deficiencies will be tracked by project, as well as the actions taken to remedy the issues. The deficiencies and actions will be used as training tools to improve inspection procedures and to train DEES and inspection personnel for future MDT projects. MDT will track the size of project and compliance record of the contractors and subcontractors to evaluate if the environmental plans and specifications are meeting the requirements of the Construction General Permit and protecting the state's water quality. MDT staff will inspect 100% of projects within the Small MS4. The DEES attend, send a designee, or communicate directly with the project manager prior to 100% of the Pre-Construction conferences for construction projects within the Small MS4s.

SWMP Activity or Component Name	**MDT Information Analysis BMP-CRSC-03**	**MDT Training BMP-CSRC-04**	**Internal Project Administration BMP-CSRC-05**
Minimum Control Measure Name (If Applicable)	Construction Site Runoff Control	Construction Site Runoff Control	Construction Site Runoff Control
General Permit Condition Item Number (If Applicable)	II.B.4	II.B.4	II.B.4
Brief Description of Planned SWMP Action Taken	Evaluate information gathered to improve awareness and enhance current programs.	Provide trained staff responsible for the implementation, maintenance, and inspection of the storm water program. MDT personnel will be trained in the selection, implementation, inspection and maintenance of storm water BMPs.	MDT will use contractual agreements to ensure that projects are constructed in a manner that complies with the Clean Water Act.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES	MDT, MS4 Coordinator, DEES	MDT, MS4 Coordinator, PDEs
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	Yes	Yes
Measurable Goal or Performance Standard Utilized	The MS4 Coordinator will attend five workgroup meetings per year. These meetings may be with co-permittees, other water quality groups, or MDT staff to discuss beneficial ways to improve storm water quality. The DEES will attend at least one MDT maintenance section meeting per year for each Small MS4.	The MS4 Coordinator will maintain a log with the dates of MDT training sessions, including the online SWPPP administrator certification. Names of attendees, their departments and their responsibilities will be included on the logs. Feedback provided during the training sessions will also be tracked to improve procedures and guidelines. Data for this log will be provided to the MS4 Coordinator through the DEES at each Small MS4. The DEES will present during at least one Engineering Project Manager (EPM) meeting per year. The presentation will be a discussion of current storm water issues and will provide an opportunity for storm water questions related to design and construction activities.	MDT will include the MS4 special provision in 100% of contracts taking place in a Small MS4. In 100% of the contracts in a Small MS4, MDT will include standard and/or special provisions requiring appropriate storm water pollution prevention and acquisition of necessary permits prior to the commencement of construction activities. The MS4 Coordinator will track projects let to contract each year in Small MS4s and will ensure appropriate standard and special provisions are included in each of the contract documents. ***Note:*** *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.*

SWMP Activity or Component Name	**Plan Reviews BMP-PCRC-01**	**Construction and Post-Construction Site Inspections BMP-PCRC-02**	**Operation and Maintenance of BMPs BMP-PCRC-03**
Minimum Control Measure Name (If Applicable)	Post-Construction Runoff in New Development and Redevelopment	Post-Construction Runoff in New Development and Redevelopment	Post-Construction Runoff in New Development and Redevelopment
General Permit Condition Item Number (If Applicable)	II.B.5	II.B.5	II.B.5
Brief Description of Planned SWMP Action Taken	MDT reviewers will verify that applicable federal, tribal, state and local laws and regulations are followed as required by the Small MS4 Program.	MDT construction personnel inspect the features as they are being constructed to ensure that they are constructed according to the contract documents including the plans and specifications.	Evaluate MDT Operation and Maintenance Program to ensure being conducted in an effective manner.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, PDEs	MDT, DEES, Maintenance and Construction personnel	MDT, DEES, Maintenance personnel
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	Yes	Yes
Measurable Goal or Performance Standard Utilized	The measurable goal for this BMP will be for PDEs to review 100% of the plans within the Small MS4s. When applicable, the PDEs will recommend to the design team incorporation of PESC/LID structures.	MDT construction personnel will inspect structural (permanent) BMPs on 100% of projects in a Small MS4. Before MDT assumes responsibility for a storm water permit from the Contractor, MDT personnel including the DEES, maintenance personnel, and construction personnel, complete a final project closeout inspection to ensure project BMPs (temporary and permanent) are correctly installed and functioning properly. After the project closeout is complete, the BMP maintenance becomes MDT's responsibility. MDT maintenance personnel perform maintenance on the temporary and permanent BMPs as needed. Items that could be improved during the construction phase will be passed on to construction for consideration in future projects.	Records of the current MDT Operation and Maintenance Program will be reviewed and evaluated to ensure that the O&M of BMPs is being conducted in an effective manner. The evaluation of the Program will be tailored to each MS4 area. Facilities managed by other entities (i.e., county or city) will be their sole responsibility.

SWMP Activity or Component Name	**Reviewers and Inspectors Training BMP-PCRC-04**	**Low Impact Development Approach BMP-PCRC-05**
Minimum Control Measure Name (If Applicable)	Post-Construction Runoff in New Development and Redevelopment	Post-Construction Runoff in New Development and Redevelopment
General Permit Condition Item Number (If Applicable)	II.B.5	II.B.5
Brief Description of Planned SWMP Action Taken	MDT will provide training and guidance material to its employees on environmental compliance and storm water BMPs.	MDT will attempt to incorporate LID techniques where practicable in MDT 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, MS4 Coordinator, DEES	MDT, MS4 Coordinator, PDEs
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	Yes
Measurable Goal or Performance Standard Utilized	MDT will continue to provide training to its employees on environmental compliance and storm water BMPs. Continued educational programs and specialized training will continue to be made available for individuals involved in the plan review process and for inspection personnel. The MDT-provided training and education programs attended by MDT personnel will be tracked as part of this BMP. Pertinent staff members will attend at least one relevant training session per permit period to develop and expand their skills pertaining to storm water pollution prevention techniques. This training will be available as an online self-review of the PESC Design Guidelines manual. MDT conducts periodic training on and updates of the PESC Manual as necessary.	For road construction projects in MS4 areas, MDT will evaluate 100% of designs for the potential of incorporating LID techniques. When the requirements are triggered (i.e. a new development or redevelopment project with disturbance greater than or equal to 1 acre), LID opportunities will be explored. PDEs will be the lead on this effort and will provide data to the MS4 Coordinator for tracking. For "state actions" at MDT facilities within Small MS4 areas, MDT will evaluate 100% of designs for appropriateness of incorporating LID techniques. Each proposed project will be reviewed for triggering the requirements for incorporating LID, as practicable. When the requirements are triggered, LID opportunities will be explored. PDEs will be the lead on this effort and will provide data to the MS4 Coordinator for tracking. For encroachment and approach permit applications within Small MS4 areas, MDT will evaluate 100% of applications for appropriateness of incorporating LID techniques. Appropriate MS4-related information will be included in the permit issuance correspondence. PDEs will be the lead on this effort and will provide data to the MS4 Coordinator for tracking.

SWMP Activity or Component Name	**Ordinances and Storm Water Design Criteria BMP-PCRC-06**	**Vegetation Management Program BMP-PCRC-07**
Minimum Control Measure Name (If Applicable)	Post-Construction Runoff in New Development and Redevelopment	Post-Construction Runoff in New Development and Redevelopment
General Permit Condition Item Number (If Applicable)	II.B.5	II.B.5
Brief Description of Planned SWMP Action Taken	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. MDT follows applicable federal, tribal, state and local laws and regulations within the Small MS4s.	Evaluate projects within Small MS4s that have open SWPPP permits for use of federal funds to conduct further revegetation that promotes closure of the SWPPP plans.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, PDEs, DEES	MDT, DEES, Botanist
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	Yes
Measurable Goal or Performance Standard Utilized	MDT will continue to follow federal, tribal, state and local laws and regulation and design standards. MDT will maintain and follow its design criteria for PESC and LID measures or seek formalized design exceptions for 100% of projects within Small MS4s.	This BMP will be measured by comparing projects within the Small MS4s with open SWPPP permits held by MDT. A determination will be made if improvement to the control of storm water run-off and infiltration can be improved with further re-vegetation. The open permit projects and the projects that are closed will be tracked as well as the projects where funding was allocated within the Small MS4s.

SWMP Activity or Component Name	**Training** **BMP-PPGH-01.1**
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, SWPPP, and the SPCC Plans.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES, other Environmental Staff
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes
Measurable Goal or Performance Standard Utilized	a) This BMP will be measured by ensuring that 100% of the DEES and MDT Maintenance staff performing SWPPP inspections in Small MS4s are in compliance with the construction general permit and will have Certified SWPPP Administrator training/certification. Records will be kept of personnel who have taken the SWPPP Administrator training and passed the test to become an MDT Certified SWPPP Administrator. b) This BMP will be measured by ensuring that 100% of the Maintenance staff performing site-specific FPPP inspections in Small MS4s has site specific FPPP training. Records will be kept of personnel who have received training on the site-specific FPPP inspection procedures. c) The DEES will provide a presentation regarding storm water issues during at least one EPM meeting per year. The presentation will be a discussion of current storm water issues and an opportunity for questions regarding storm water issues related to design and construction activities. d) The DEES will provide a presentation during at least one MDT maintenance section man meeting per year. The presentation will include a discussion of current storm water control issues and an opportunity for questions regarding storm water control related to maintenance activities and facilities.

SWMP Activity or Component Name	**Training** **BMP-PPGH-01.2**
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, and the SPCC Plans.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES, other Environmental Staff
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes
Measurable Goal or Performance Standard Utilized	a) ESB personnel, generally the Engineering Section Supervisor or the Field Services Engineer, will attend at least one quarterly District Construction Engineer (DCE) meeting per year and provide information related to MDT's overall storm water management program, including MS4 issues. b) ESB personnel, generally the Engineering Section Supervisor or the Field Services Engineer, will attend at least one quarterly Maintenance Chiefs meeting per year and provide information related to MDT's overall storm water management program, including MS4 issues. c) Several MDT facilities in MS4 areas fall under the SPCC Rule and have SPCC Plans. SPCC training, which includes information related to the MS4 Program, will be offered annually or according to SPCC requirements. d) MDT has developed site-specific FPPPs for MDT facilities within MS4 areas. Training is offered on each site specific FPPP upon completion of the plan. Additional training will be offered when the plan is amended or on an as needed basis, as necessary. Dates, name, and responsibility of staff members, as well as topics discussed, will be tracked on a spreadsheet as part of this measurable goal. ***Note:*** *In March 2021, MDT finalized a formal FPPP Update and Training procedure to ensure FPPPs are formally updated on a routine basis and that maintenance personnel receive storm water training specific to each facility. In 2021, MDT initiated updates to the FPPPs and will finalize those updated plans in 2022. Facility-specific training will be provided in 2022.*

SWMP Activity or Component Name	**Periodic SWPPP and SPCC Plan Inspections BMP-PPGH-02**	**Road and Parking Sweeping BMP-PPGH-03**	**Road and Parking Area Maintenance BMP-PPGH-04**
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	MDT will perform site inspections for MDT facilities within the Small MS4s with FPPP and SPCC plans on the time basis documented in the SWMP.	Implement a Street Sweeping Program that encompasses the streets and roadways, the maintenance yards and parking areas within its facilities. The street sweeping frequency depends on need and travel volumes. Sweepers also respond to certain types of spills that require clean-up work.	MDT will follow its Roadway/Roadside Maintenance Program to maintain roadways/roadsides for safety, to protect the environment, and to maintain a pleasing aesthetics in a functional manner.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES, Maintenance staff	MDT, Maintenance Staff	MDT, MS4 Coordinator, DEES, Maintenance Staff
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	Yes	Yes
Measurable Goal or Performance Standard Utilized	The DEES and MS4 Coordinator will analyze the FPPP inspection forms on a yearly basis to evaluate opportunities to improve and deal with identified deficiencies. In some cases, funds will have to be secured to improve the current infrastructure and might require several years before the BMP can be fully implemented.	MDT's goal for the street sweeping program is to sweep 100% of the facilities and MDT maintained roads that are within our permitted Small MS4s a minimum of one time per year.	MDT will evaluate current practices used during maintenance and operational activities to determine if modifications to these practices are warranted to minimize storm water pollutants reaching water ways. The evaluation of BMPs and procedures as well as suggestions will be documented to determine the best course of action to implement improvements as the measurable goal for this BMP. Cost, ease of implementation, and risk and benefit analysis will be taken into account to make recommendations to MDT management.

SWMP Activity or Component Name	**Winter Maintenance Program BMP-PPGH-05**	**Recycling Activities BMP-PPGH-06**	**Vehicle Washing BMP-PPGH-07**
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	MDT will evaluate the Winter Maintenance Program for feasible ways to transition to more environmentally friendly methods.	MDT has several recycling programs in place at the maintenance facilities within the Small MS4s. These programs will continue to be offered.	To evaluate the vehicle wash areas and procedures to minimize discharge of pollutants into surface water.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, and Maintenance Chiefs	MDT, MS4 Coordinator, DEES, Maintenance staff	MDT, MS4 Coordinator, DEES, Maintenance Staff
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	Yes	Yes
Measurable Goal or Performance Standard Utilized	MDT will evaluate the current procedures described in the Winter Maintenance Program and if necessary, revise the existing manuals to reduce the potential of pollutants being discharged into the environment and consequently into waterways. The evaluation will be performed during the permit period, and revisions to the manuals will be posted on the MDT intranet.	MDT will continue to recycle and burn the used oil to heat select MDT facilities. MDT will also continue to recycle scrap and unused metal through the recycling companies throughout the permit period. MDT has created FPPPs that provide guidelines to help make the storage of the recycled materials storm water runoff safe. MDT inspects the facilities on a monthly basis to ensure the recycled materials are being stored in a manner that protects storm water runoff.	MDT will evaluate each maintenance facility for short-term improvements (e.g., sweeping area at the end of the shift) and long-term improvement (e.g., a new wash bay). The short-term improvements will be implemented as soon as possible, while the long-term improvements will require additional planning and funding. In 2013, MDT completed one long term goal of constructing an updated wash bay at the Missoula MDT maintenance facility capable of appropriately disposing of wash water. Others completed include: Butte in 2015, Bozeman in 2016, and Great Falls in 2018. Additional short-term and long-term improvements may be implemented and will be tracked for each facility as a measure of this goal during the permit period.

SWMP Activity or Component Name	**Hazardous Waste Handling BMP-PPGH-08**	**Material Management BMP-PPGH-09**
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	Limit the amount and type of hazardous materials on MDT sites, how and where they are stored, and who has access to them.	MDT will continue to stockpile and store materials, such as oils and deicing materials, in a manner to reduce the likelihood of accidental spills or release hazardous materials into the storm water system.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES, Maintenance Staff	MDT, MS4 Coordinator, DEES, Hazmat section, and Maintenance Staff
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	Yes
Measurable Goal or Performance Standard Utilized	MDT will continue to ensure that its staff are following the proper procedures when handling and storing hazardous materials and are well informed of the type and potential dangers associated with each chemical. Safety Data Sheets (SDSs) are available at each facility within the MS4 areas and staff comply with the requirements of the SPCC Plans including monthly site inspections. MDT will evaluate the plans as revised by federal and state regulations. Staff will complete monthly inspection forms. The MS4 Coordinator working with the Hazmat Supervisor, DEES, and FSE to determine if items in the inspection process need to be amended based on data provided in inspection forms. The measurable goal for this BMP will be to maintain MDT's status of conditionally exempt.	MDT will review existing storage procedures to ensure that they are current and effective. Revisions will be posted and employees will be made aware of the changes. This BMP will be measured by the number of spills that are reported within a permit period as required by the SWPPP and SPCC Plans. The main goal is to eliminate spills and have zero reported spills during the permit period. If a spill is reported within a permit period, corrective actions will be taken to remedy the spill and preventive measures will be put into place to prevent the spills from reoccurring.

SWMP Activity or Component Name	**Storm Drain System Cleaning and Maintenance BMP-PPGH-010**	**Develop SWPPPs and Updates to SWPPPs BMP-PPGH-11**
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	Conduct routine system inspections, cleaning, and maintenance of MDT maintenance facilities, yards, and storm water infrastructure within the MDT right of way.	MDT has developed FPPPs for MDT facilities within the Small MS4s. MDT will update FPPPS as needed.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES, Maintenance staff	MDT, MS4 Coordinator, DEES, Maintenance Staff
Development of SWMP Item Completed and/or In Effect (Yes/No)	Yes	Yes
Measurable Goal or Performance Standard Utilized	MDT will continue the current maintenance program and track the number of inspections, cleanings, and repairs conducted at each maintenance facility as well as continue maintenance conducted on MDT's right of way within the MS4 areas. MDT tracks hours and supplies in the Management System for each MS4 area. MDT will clean and provide maintenance to storm water structures as necessary. The need is determined from the inspections taking place as a regular part of the maintenance department employees' job duties. Other forms of notification can be from the public, city or county employees.	MDT will continue to evaluate and update the FPPPs as conditions change regarding design, construction, operation, or maintenance at the different facilities. The changes will be recorded in the Amendment Record Log included in each FPPP. In addition, MDT will continue to train its staff to better understand the implications of contaminating storm water and procedures to reduce the potential of contamination. MDT staff will complete the monthly FPPP inspection forms at the currently existing FPPP locations. FPPP inspections will be reviewed and analyzed by the MS4 Coordinator annually for the annual report. The forms, addendums, and training will be the measurable goal for this BMP. ***Note:*** *In March 2021, MDT finalized a formal FPPP Update and Training procedure to ensure FPPPs are formally updated on a routine basis and that maintenance personnel receive storm water training specific to each facility. In 2021, MDT initiated updates to the FPPPs and will finalize those updated plans in 2022. Facility-specific training will be provided in 2022.*

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	**Printed Media** **BMP-PEO-01**
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	Make printed media available to the public.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, Public Info Officer, DEES
Measurable Goal or Performance Standard Utilized	MDT will track, in a spreadsheet, the printed media types that were generated, the number of brochures, pamphlets, and other printed media distributed as well as the dates and locations where the printed media was handed out. At the end of the permit period, the MS4 Coordinator will compile the information recorded. MDT will distribute 5% more printed educational material than the prior year. An MS4 related article will post once a year in MDT's Rail, Transit & Planning Division 'Newsline'.
Quantitative Indicators Used and Results	MDT has a supply of printed brochures that are provided at the entrances to MDT Headquarters and District Main Offices, as well as by MDT environmental staff. However, opportunities for distribution of printed materials were somewhat limited in 2021 due to COVID-19 restrictions. MDT offered brochures in the following MS4s: - Bozeman MS4: At the Bozeman Public Library, distributed 10 "Do Your Part to Prevent Stormwater Pollution" pamphlets, 10 "Illicit Discharge Detection and Elimination (IDDE) pamphlets, 10 "Take the Stormwater Challenge" crossword handouts. At the MDT 19th Street I-90 Rest Area display case, distributed 10 "Do Your Part to Prevent Stormwater Pollution" pamphlets, 10 "Illicit Discharge Detection and Elimination (IDDE) pamphlets, 10 "Take the Stormwater Challenge" crossword handouts. The number remaining at the end of 2021 is unknown. - Butte MS4: At the Butte Chamber Visitor Center, distributed 45 pamphlets and crossword handouts. - Missoula MS4: At the Missoula County Fair, distributed 57 "Illicit Discharge Detection and Elimination (IDDE)" pamphlets, 51 "Do Your Part to Prevent Stormwater Pollution" pamphlets, and 56 stickers. - Kalispell MS4: At the Flathead County Fair, distributed 43 "Illicit Discharge Detection and Elimination (IDDE)" pamphlets, 49 "Do Your Part to Prevent Stormwater Pollution" pamphlets, and 44 stickers. - Billings/Yellowstone County MS4: At the Billings Library, distributed 30 "Preventing Stormwater Pollution" handouts. An estimated total of 134 printed documents were distributed in 2020; therefore, 7 additional documents would need to be distributed in 2021 to achieve a 5% increase in distribution. An estimated total of 335 printed documents, excluding stickers, were distributed in 2021, reaching this goal. Additionally, the June 2021 MDT publication, "Newsline," which was distributed state-wide, included an article which described MDT's SWMP and requested input.
Impact on SWMP Effectiveness	Provide positive public education with a unified statewide message.

SWMP Activity or Component Name	**Web Sites and Social Media Sites** **BMP-PEO-02**
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	Post storm water specific information on MDT online sources including MDT Intranet (for MDT employees), MDT internet (for roadway users), and Facebook (for roadway users).
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, Environmental Engineering Section Supervisor
Measurable Goal or Performance Standard Utilized	This BMP will be measured by several means. First, the amount of feedback received from the Montana MS4 website, which has a link to allow comments to be emailed to MDT. The MDT MS4 Coordinator will post at least four status updates related to storm water, water quality, and other MS4 issues on the MDT social media site (e.g. Facebook) each year. This BMP will be measured by the number of subscribers to the MDT site and by the "likes" and "comments" associated with the posts. This BMP will also be measured by the development of the MDT internal MS4 website during the year 2014.
Quantitative Indicators Used and Results	MDT discontinued the Montana MS4 website and instead utilizes MDT's MS4-specific internet and intranet sites. This MS4 intranet site is a "one-stop" source of information on the MS4 program for MDT employees and includes links to FPPPs, annual reports, educational and guidance material, MS4 maps, library material, and other websites resources for MDT's Storm Water Program. In 2021, MDT posted seven Facebook posts and two Instagram posts related to MS4. The MDT Instagram account has 3,022 followers, and the MDT Facebook account has 42,038 followers, a 16% increase from 2020. There was one post about preventing concrete wash water dumping, one post about spills in streets go into streams, and seven posts about the public comment period for MDT's Storm Water Management Program with a total of 136 "likes." Overall, MDT had 9 posts, up 12.5% from 2020, and 136 "likes," down 29.5% from the previous year. No comments were associated with these posts.
Impact on SWMP Effectiveness	Allows sharing of a unified statewide message on storm water with a diverse and widespread audience.

SWMP Activity or Component Name	Public Events BMP-PEO-03
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	To reach target audiences by providing or sponsoring presentations in schools and universities, conferences, retirement communities, civic clubs, libraries, businesses, and association meetings.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, Public Info Officer, DEES, Environmental Engineering Section Supervisor
Measurable Goal or Performance Standard Utilized	MDT's Statewide MS4 Coordinator will participate in at least one public event each year to promote the Statewide MDT MS4 Program. In addition, the DEES will attend at least one public event each year to promote the storm water management program efforts in each MS4 area. Events may include storm water conferences, Storm Water Awareness Week, Montana State Fair, local Science Fairs, Earth Day, educational booths and presentations at schools and universities. MDT will track the number of events attended by MDT personnel, the date and location of events, and if possible, the number of event participants. The information will be compiled at the end of the permit period to determine its effectiveness for educating the public.
Quantitative Indicators Used and Results	In 2016, the Statewide MS4 Coordinator's participation in public outreach events was discontinued since it was duplicative of the efforts completed by the DEES. The DEES attended public outreach events in two of the MS4 areas in 2021. - Missoula MS4: County Fair – 8/11/2021. Communicated with fairgoer's and distributed 57 IDDE brochures, 51 prevent stormwater pollution brochure, and 56 stickers. - Kalispell MS4: County Fair – 8/18/2021. Communicated with fairgoer's and distributed 43 IDDE brochures, 49 prevent stormwater pollution brochure, and 44 stickers. Due to the COVID-19 pandemic, many public events were conducted virtually making public outreach difficult in 2021. Although outreach was limited in 2021, plans to attend 2022 events such as local science fairs and county fairs is being explored.
Impact on SWMP Effectiveness	Provide positive public education with a unified statewide message.

SWMP Activity or Component Name	Guidance Manuals and Educational Materials BMP-PEO-04.1
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	Make a variety of guidance manuals and educational materials accessible through the MDT website.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES
Measurable Goal or Performance Standard Utilized	In 2014 a link will be added to the MontanaMS4 website (http://montanaMS4.com) to take the user to MDT's guidance and educational manuals. The first measurable goal will be to perform an annual review by the MS4 Coordinator of the internal and external MDT websites to verify that the links to the reference materials are accurate and up to date.
Quantitative Indicators Used and Results	MDT discontinued the MontanaMS4 website and instead utilizes MDT's MS4-specific intranet and internet site. The intranet site is a "one-stop" source of information on MDT's MS4 program for MDT employees and includes links to FPPPs, MS4 maps, MDT's SWMP, Annual Reports, educational and guidance material, MDT library material, and other websites that provide resources for MDT's MS4 program. Both the internal MS4 and Environmental Services Bureau pages provide links to MDTs external internet site (http://www.mdt.mt.gov/pubinvolve/stormwater/) where MDT's Storm Water guidance and educational manuals are also available. The internet site provides general storm water information and education on MDT's MS4 program as well as links to MDT staff contacts, MDT's SWMP, MS4 maps, and other websites that provide resources for MDT's MS4 program. The links for these sites were checked for accuracy. While links on the internet site were found to be up to date, a few of the links on MDT's intranet site were identified for updates. Completed FPPP documents were not uploaded for 2021. A new maintenance shop was constructed in the Bozeman MS4 and the old maintenance shop FPPP link needs to be removed from the site. Several website links found under MS4 Education resources need to be checked for access when connected to the MDT server, and another link, TRB-AFB60 needs to be checked for relevancy and access. Additionally, contact information for Statewide Environmental Engineering Specialist needs to be updated on the sites. MDT is currently in the process of making the identified updates.
Impact on SWMP Effectiveness	Provide consistent preventative measures to ensure that construction and maintenance activities are conducted in compliance with the law and in such a manner that reduces the amount of pollutants discharged to surface water to the maximum extent practicable.

SWMP Activity or Component Name	Guidance Manuals and Educational Materials BMP-PEO-04.2	Public Forums BMP-PPI-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	Work with the MDT Librarian to create a collection of storm water materials available for education and training.	Provide the public the opportunity to comment on storm water concerns through project public meetings, public notices, NEPA/MEPA process, and corridor study process.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator	MDT, MS4 Coordinator, Project Development Engineers, public information personnel
Measurable Goal or Performance Standard Utilized	Work with the MDT Librarian once per year to review MDT's educational materials related to storm water. This review will consist of verifying that the materials available at the MDT library are accurate, adequate, and up to date. New materials will then be acquired as needed and allowed by budgetary constraints.	Compliance with NEPA and MEPA is confirmed through audits. The results of these audits will be used to track this BMP throughout the permit period.
Quantitative Indicators Used and Results	The database of available material currently in place at MDT's library was reviewed. Adequate materials were found to be available for checkout by employees, with 62 online and physical resources with "Stormwater" in their title. In addition, the "Education Resources" link on the MDT internal MS4 page takes the viewer to the currently available library resources for storm water management as well as other MS4 education resources.	This year FHWA has not done an audit of NEPA compliance; however, public involvement requirements were confirmed with the production of an Environmental Certification Memo for all federal aid construction projects. MDT produces these memos prior to federal funding as a self-check that required environmental reviews including public involvement have been conducted.
Impact on SWMP Effectiveness	Provide consistent preventative measures to ensure that construction and maintenance activities are conducted in compliance with the law and in such a manner that reduces the amount of pollutants discharged to surface water to the maximum extent practicable.	Provide opportunities for the public to get involved and voice concerns early in the process.

SWMP Activity or Component Name	**Clean-up and Volunteer Events BMP-PPI-02**
Minimum Control Measure Name (If Applicable)	Public Involvement/ Participation
General Permit Condition Item Number (If Applicable)	II.B.2
Brief Description of Planned SWMP Action Taken	Adopt-A-Highway is statewide program administered by MDT 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, Adopt-A-Highway program manager, MS4 Coordinator
Measurable Goal or Performance Standard Utilized	MDT will continue to offer the Adopt-a-Highway program. MDT's current goal for this BMP is to work with the Adopt-a-Highway program manager to assist in creating the ability for statewide consistent compliance tracking by the end of the 2015 permit cycle. The compliance tracking will be able to keep track of which sections of roadways by reference posts are adopted, who has adopted them, and how often trash pickup is occurring.
Quantitative Indicators Used and Results	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. The total miles (sections) of adopted highway that either fall within or intersect the MS4 boundaries is **157**. Thirty-nine new sections were added to the program in 2021. A breakdown of these miles by MS4 can be found below. Billings/Yellowstone County: 40 miles Bozeman: 7 miles Butte: 8 miles (4 miles newly adopted during 2021) Great Falls: 29 (12 miles newly adopted during 2021) Helena: 10 miles Kalispell: 12 Missoula: 51 miles (23 miles newly adopted during 2021)
Impact on SWMP Effectiveness	Clean-up events offer the community an opportunity to participate in organized and formal activities to promote storm water awareness.

SWMP Activity or Component Name	**Feedback** **BMP-PPI-03**
Minimum Control Measure Name (If Applicable)	Public Involvement/ Participation
General Permit Condition Item Number (If Applicable)	II.B.2
Brief Description of Planned SWMP Action Taken	The public can provide feedback using several different methods. MDT will address this feedback and incorporate the feedback where appropriate.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, and other MDT staff as applicable
Measurable Goal or Performance Standard Utilized	On MDT's social media site, the MS4 Coordinator will make at least four announcements per year. MDT will continue to solicit feedback through work group discussions, website comments, phone calls, written e-mails or letters, training evaluations, surveys, public comment periods, and personal interactions. The MS4 Coordinator will use a spreadsheet to keep track of the amount and type of feedback received. The MS4 Coordinator will evaluate the BMPs progress based on the amount and type of feedback received via available sources. The MS4 Coordinator will use the feedback received to create updates and revisions to the storm water program on an as needed basis to increase the amount of feedback and public interaction received.
Quantitative Indicators Used and Results	In 2021, MDT posted seven Facebook posts and two Instagram posts related to MS4. The MDT Instagram account has 3,022 followers, and the MDT Facebook account has 42,038 followers, a 16% increase from 2020. There was one post about preventing concrete wash water dumping, one post about spills in streets go into streams, and seven posts about the public comment period for MDT's Storm Water Management Program with a total of 136 "likes." Overall, MDT had 9 posts, up 12.5% from 2020, and 136 "likes," down 29.5% from the previous year. No comments were associated with these posts. Additionally, in 2021 MDT developed a SWMP feedback form for use in soliciting input. This form has been tested by the DEES and is expected to be finalized in 2022.
Impact on SWMP Effectiveness	Feedback ensures that MDT is developing an effective program that responds to the needs of its MS4 users.

SWMP Activity or Component Name	Storm Water System Mapping BMP-IDDE-01
Minimum Control Measure Name (If Applicable)	Illicit Discharge Detection and Elimination
General Permit Condition Item Number (If Applicable)	II.B.3
Brief Description of Planned SWMP Action Taken	A statewide effort to map MDT's storm water system in MS4 areas.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES
Measurable Goal or Performance Standard Utilized	The statewide MS4 Coordinator will continue to update each Small MS4 storm water system map on an annual basis and will make the updated maps available in electronic format upon request. These MS4 maps will be available online in 2014. MDT will solicit information from cities and counties to ensure that the information is as accurate as possible. MDT will also share new project information with co-permittees upon request. Updates include areas of new development or infrastructure improvements, as well as those areas where new information becomes available during maintenance activities. In addition, MDT will revise the MS4 boundaries based on city limit changes and census information on a yearly basis if these two items have changed. This BMP's success will be based on the Small MS4 maps being updated with new information, and 25% of inlets being mapped in 2014. Over the permit cycle, starting in 2015, MDT will collect and map our inlets, open channels, subsurface conduits/pipes, dry wells, and other similar storm water conveyances.
Quantitative Indicators Used and Results	MDT has transitioned to interactive MS4 mapping tools which are available online. Updates to MS4 boundaries occurred in 2021, as well as mapping of outfalls, inlets, and other storm water conveyances. MDT completed mapping of MS4 outfalls statewide using procedures outlined in MDT's MS4 Outfall Inventory Guidance. Currently, this new list of outfalls is undergoing quality control checks. The new list, once verified, will be provided to MDEQ for assistance in drafting MDT's individual permit. Baseline inlet mapping data collection efforts were also completed for all MS4s. MDT did not receive any formal requests for information from other MS4s independent of the routine collaboration on MDT's design projects and maintenance activities.
Impact on SWMP Effectiveness	A better understanding of the storm water infrastructure and the locations of each outfall that discharges into state water bodies allows MDT staff to target our storm water program toward areas that have the highest risk of affecting water quality.

SWMP Activity or Component Name	Dry Weather Screening BMP-IDDE-02
Minimum Control Measure Name (If Applicable)	IDDE
General Permit Condition Item Number (If Applicable)	II.B.3
Brief Description of Planned SWMP Action Taken	Monitoring of outfalls within the MDT jurisdiction by use of dry weather screening and visual observation.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES, FSE, and Maintenance Staff
Measurable Goal or Performance Standard Utilized	The DEES is responsible for performing dry weather screening at each outfall once per permit cycle. The information they gather will be used to update both the dry weather screening form along with the tracking spreadsheet. The IDDE Program protocols will be made available on the MDT website. The number of illicit or illegal discharges reported to the MS4 Coordinator will be analyzed and compared to previous years. MDT will also track the date, the outfall location, the response action, and the outcome of the implementation of such actions. Success of this BMP will be to eliminate 100% of illicit or illegal discharges from MDT operations.
Quantitative Indicators Used and Results	The IDDE protocols are available on the MDT intranet site. In 2021, MDT updated the dry weather screening process to better evaluate outcomes. The new process is documented in MDT's IDDE Investigation and Corrective Action Plan. The Outfall Visual Assessment form was updated for dry weather screening, and an Illicit Discharge Incident Reporting form was created to better track investigation and follow-up for illicit discharges. The 2021 dry weather screening campaign evaluated approximately 25% of all currently listed MDT outfalls. The number of outfalls screened in 2021 by MS4 area are as follows: Billings/Yellowstone County: 17 of 35 (48%) Bozeman: 4 of 22 (18%) Great Falls: 0 of 25 (0%) Kalispell: 5 of 19 (26%) Butte: 4 of 21 (19%) Missoula: 11 of 35 (31%) Helena: 0 of 8 (0%) No dry weather screening was performed in the Helena and Great Falls MS4s due to new DEES becoming familiar with program requirements. As documented in the dry weather screening forms, potential illicit discharges were identified at the following locations: - Butte MS4 - 08/4/21: The inspection of outfall D in Butte identified a risk of *potential* discharge via a trickle with a faint odor, faint brown color, and floatables present. The discharge may possibly be irrigation water. - Butte MS4 - 08/4/21: The inspection of outfall F in Butte identified a risk of *potential* discharge via a trickle from the outfall. There was no odor present and the water was clear. The discharge may be irrigation water. - Billings MS4 - 09/27/21: The inspection of outfall C056200RP0.73b identified a risk of *potential* discharge via flow present. There was no odor present and the water was clear. The discharge appeared to be irrigation water. - Billings MS4 - 09/27/21: The inspection of outfall C0053RP0.29 identified a risk of *potential* discharge via flow present. There was no odor present and the water was clear. The discharge appeared to be irrigation water.
Impact on SWMP Effectiveness	Identifies illicit or illegal discharges that need to be eliminated.

SWMP Activity or Component Name	**Storm Water Ordinances** **BMP-IDDE-03**
Minimum Control Measure Name (If Applicable)	IDDE
General Permit Condition Item Number (If Applicable)	II.B.3
Brief Description of Planned SWMP Action Taken	MDT will follow local ordinances, statutes, and regulations within the Small MS4s. MDT will notify the proper enforcement authority available in the select Small MS4 that has an existing storm water ordinance in place.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES, and construction inspectors
Measurable Goal or Performance Standard Utilized	MDT does not have legal authority to establish ordinances. As a result, it will rely on other governmental bodies to add ordinances and regulation to the existing standards that help eliminate illicit or illegal discharges into state water bodies. For applications within the Small MS4, MDT will continue to list in right of way approach and encroachment permits that applicants are expected to follow local ordinances, which include the city MS4 ordinances. As part of this measurable goal, MDT will follow applicable ordinances, and report non-compliance to the appropriate authorities. MDT will evaluate the local agreements with co-permittees at the end of this permit cycle. In addition, MDT will continue to follow the *Escalation Plan* spelled out in Management memo 03-01 that will be made available in electronic format on the MDT website in the year 2014.
Quantitative Indicators Used and Results	In December 2021, MDT finalized its IDDE Investigation and Corrective Action Plan and Enforcement Response Plan. A new illicit discharge reporting form was created to better track discharge resolution. MDT coordinated with local authorities to address following two spills: Butte MS4: - 1/30/21: A fuel truck was refilling underground storage tanks at the Town Pump located at the southeast corner of Elizabeth Warren & Harrison Avenue, when the tank overfilled and a spill of about 400 to 500 gallons of diesel fuel occurred at the site. DEQ was notified immediately, and WET was contacted for spill response and cleanup. - 8/25/2021: At the intersection of MT Highway 2 and Harrison Avenue a semi-truck struck a passenger vehicle and approximately 30 gallons of diesel spilled from the cab's tanks. Sand was placed to help prevent the migration of fuel into a storm drain. The manhole downstream was inspected, and it appeared fuel did not make it that far. The main drain was pumped out by Butte Silver Bow (BSB) employees with a Vac Truck, and absorbent socks were placed in the bottom of the drain. GTR wrecking company cleaned up the area. MDT's environmental checklist that is part of approach and encroachment applications includes a question of whether the activity is in an MS4 boundary. Applications for projects located within MS4 boundaries are to be reviewed by the Environmental Service Bureau. In 2021, ESB processed 20 approach and encroachment permit applications within an MS4.
Impact on SWMP Effectiveness	Provide statewide consistency for reporting illicit discharges.

SWMP Activity or Component Name	**Public Education on IDDE** **BMP-IDDE-04**
Minimum Control Measure Name (If Applicable)	IDDE
General Permit Condition Item Number (If Applicable)	II.B.3
Brief Description of Planned SWMP Action Taken	MDT currently provides information on possible illicit and illegal discharges in our printed education material and on our website. MDT will continue to provide this information.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, and other MDT staff
Measurable Goal or Performance Standard Utilized	MDT will track, when possible, the number of calls, emails, or postings on MDT's social media sites. A reporting spreadsheet will be generated in 2014 by the MS4 Coordinator. Information provided during the reporting will be entered in the spreadsheet. The action taken by MDT to resolve the problem will also be included in the spreadsheet. When available, MDT will record how the information was acquired. MDT will use this information to evaluate the highest used method of reporting. Reporting methods not being used will be evaluated to determine if changes can be made to improve its effectiveness. The number of reports will determine if having a public reporting system is effective. The results will be presented in each Annual Report. As stated in BMP 3.3.1.2, the MS4 Coordinator will be posting status updates on MDT's social media (i.e. Facebook) page. One of these posts will be related to IDDE.
Quantitative Indicators Used and Results	MDT tracks the number of likes, shares, and comments on MDT's social media pages. IDDE-specific messages were posted on MDT's Facebook or Instagram pages in 2021. MDT's internet site provides information specific to IDDE and includes a link to contact the Department. The current tracking spreadsheet has a tab for IDDE and is continuously being updated.
Impact on SWMP Effectiveness	Provides information on reporting illicit discharges and the process for escalation.

SWMP Activity or Component Name	Training BMP-IDDE-05	Construction SWPPP BMP-CSRC-01
Minimum Control Measure Name (If Applicable)	IDDE	Construction Site Runoff Control
General Permit Condition Item Number (If Applicable)	II.B.3	II.B.4
Brief Description of Planned SWMP Action Taken	Provide district personnel with IDDE training specific to their job duties.	At construction sites that are required to obtain an MPDES General Permit for Storm Water Discharges associated with Construction Activity, the contractors must prepare a SWPPP.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES	MDT, PDE
Measurable Goal or Performance Standard Utilized	This training will be part of the IDDE Training Program and will be performed annually for key personnel. MDT will track the date, location and employees trained each year as part of the IDDE Training Program at each MS4. Success will be determined by ensuring up to date training material and employees training as requested.	MDT continues to place a special provision in project contracts that require contractors on construction sites disturbing 1 acre or greater to adhere to the MPDES General Permit for Storm Water Discharges associated with Construction Activity. The measurable goal for the BMP is that project contracts have the MPDES Special Provision.
Quantitative Indicators Used and Results	In 2021, the following IDDE-specific training was provided to personnel: Statewide: 3/23/2021 –DCE meeting, 13 attended Butte and Bozeman MS4s: -4/1/2021 –EPM meeting, 20 attended -6/18/2021 -EPM meeting, 14 attended -12/9/2021 –Butte Division maintenance section meeting, 15 attended -12/14/2021 –Bozeman Division maintenance section meeting, 16 attended	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. Six projects within MS4 boundaries were let for construction in 2021. All 6 contracts let for construction were reviewed and it was determined that all received the MPDES special provision.
Impact on SWMP Effectiveness	Provide a knowledgeable staff capable of detecting and handling an illicit discharge.	Uniform inclusion of the MPDES special provision in MDT contracts meeting requirements.

SWMP Activity or Component Name	MDT Environmental and Construction Oversight BMP-CSRC-02.1
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	To provide environmental and construction oversight on MDT projects. To ensure compliance with federal, tribal, state, and local laws.
Responsible Agency, Department, or Organization; and Person or Position	MDT, DEES, and project personnel
Measurable Goal or Performance Standard Utilized	This BMP will be measured by the number of inspections conducted during the permit period. In addition, deficiencies will be tracked by project, as well as the actions taken to remedy the issues. The deficiencies and actions will be used as training tools to improve inspection procedures and to train DEES and inspection personnel for future MDT projects. MDT will track the size of project and compliance record of the contractors and subcontractors to evaluate if the environmental plans and specifications are meeting the requirements of the Construction General Permit and protecting the state's water quality. MDT staff will inspect 100% of projects within the Small MS4.
Quantitative Indicators Used and Results	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 2021 are as follows: Billings/Yellowstone County: 11 Bozeman: 6 Butte: 10 Great Falls: 6 Helena: 5 Kalispell: 15 Missoula: 48 The Environmental Construction Inspection form was used to document these inspections. Construction inspections are tracked in an excel spreadsheet
Impact on SWMP Effectiveness	Environmental and construction oversight allows MDT to monitor a contractor's performance and helps ensure that federal, tribal, state, and local laws and regulations controlling pollution of the environment are followed.

SWMP Activity or Component Name	**MDT Environmental and Construction Oversight** **BMP-CSRC-02.2**
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	To provide environmental and construction oversight on MDT projects. To ensure compliance with federal, tribal, state, and local laws.
Responsible Agency, Department, or Organization; and Person or Position	MDT, DEES, and project personnel
Measurable Goal or Performance Standard Utilized	The DEES attend, send a designee, or communicate directly with the project manager prior to 100% of the pre-Construction conferences for construction projects within the Small MS4s.
Quantitative Indicators Used and Results	In 2021, the following pre-construction conferences for projects in MS4 areas occurred and were either attended by the DEES and/or comments were provided by the DEES to the Project Manager: Billings/Yellowstone County: 4 Missoula: 2 Butte: 1 Kalispell: 3 Helena: 1 Of the 11 preconstruction meetings that were tracked, one meeting was missed resulting in an 91% attendance rate.
Impact On SWMP Effectiveness	Environmental and construction oversight allows MDT to monitor contractor's performance and helps ensure that federal, tribal, state, and local laws and regulations controlling pollution of the environment are followed.

SWMP Activity or Component Name	**MDT Information Analysis** **BMP-CRSC-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	Evaluate information gathered to improve awareness and enhance current programs.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES
Measurable Goal or Performance Standard Utilized	The MS4 Coordinator will attend five workgroup meetings per year. These meetings may be with co-permittees, other water quality groups, or MDT staff to discuss beneficial ways to improve storm water quality. The DEES will attend at least one MDT maintenance section meeting per year for each Small MS4.
Quantitative Indicators Used and Results	The MS4 Coordinator (SEES) attended multiple MS4 workgroup meetings to discuss SWMP updates as follows: 5/27/21 (MCM 1), 6/24/21 (MCM 2), 8/6/21 (MCM 3), 9/10/21 (MCM 4), 10/4/21 (MCM 5), 12/3/21 (MCM 6). The DEES provided training at MDT maintenance staff meetings on various stormwater 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: 12/22/2021 Butte/Bozeman/Helena: 12/9/2021, 12/14/2021 Missoula: 6/16/21, 10/20/21 Great Falls: 7/20/2021 Kalispell: 10/21/2021
Impact On SWMP Effectiveness	The information will be used to improve awareness and enhance current programs by revising existing procedures.

SWMP Activity or Component Name	**MDT Training** **BMP-CSRC-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	Provide trained staff responsible for the implementation, maintenance, and inspection of the storm water program. MDT personnel will be trained in the selection, implementation, inspection and maintenance of storm water BMPs.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES
Measurable Goal or Performance Standard Utilized	The MS4 Coordinator will maintain a log with the dates of MDT training sessions, including the online SWPPP administrator certification. Names of attendees, their departments and their responsibilities will be included on the logs. Feedback provided during the training sessions will also be tracked to improve procedures and guidelines. Data for this log will be provided to the MS4 Coordinator through the DEES at each Small MS4. The DEES will present during at least one EPM meeting per year. The presentation will be a discussion of current storm water issues and will provide an opportunity for storm water questions related to design and construction activities.
Quantitative Indicators Used and Results	MDT's new "MDT Classroom" for MDT maintenance personnel went live in November 2019. Twenty-four maintenance personnel and 19 construction personnel participated in the online SWPPP training in 2021. Additionally, one new DEES, the SEES, and the Reclamation Specialist attended BMP 101/201 trainings in 2021 receiving SWPPP Administrator certification, and the Field Services Engineer was recertified. The DEES attended their respective district EPM meetings on the following dates and presented storm water information: Missoula District (Missoula, Kalispell MS4s) 03/5/2021 Butte District (Bozeman, Butte MS4s) – 4/1/2021; 6/18/2021; 9/28/2021 Billings District (Billings/Yellowstone County MS4) – 3/30/2021 The EPM meeting was not attended in the Great Falls District (Great Falls and Helena MS4s) due to new DEES becoming familiar with program requirements. The Great Falls DEES has been added to the EPM meeting invite for 2022.
Impact On SWMP Effectiveness	MDT personnel will be trained in the selection, implementation, inspection and maintenance of storm water BMPs.

SWMP Activity or Component Name	**Internal Project Administration** **BMP-CSRC-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	MDT will use contractual agreements to ensure that projects are constructed in a manner that complies with the Clean Water Act.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, PDEs
Measurable Goal or Performance Standard Utilized	MDT will include the MS4 special provision in 100% of contracts taking place in a Small MS4. In 100% of the contracts in a Small MS4, MDT will include standard and/or special provisions requiring appropriate storm water pollution prevention and acquisition of necessary permits prior to the commencement of construction activities. The MS4 Coordinator will track projects let to contract each year in Small MS4s and will ensure appropriate standard and special provisions are included in each of the contract documents.
Quantitative Indicators Used and Results	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. Six projects within MS4 boundaries were let for construction in 2021. All 6 contracts let for construction were reviewed and it was determined that all received the MS4 special provision.
Impact On SWMP Effectiveness	Project will be constructed in a manner that complies with the Clean Water Act.

SWMP Activity or Component Name	**Plan Reviews** **BMP-PCRC-01**
Minimum Control Measure Name (If Applicable)	Post-Construction Runoff in New Development and Redevelopment
General Permit Condition Item Number (If Applicable)	II.B.5
Brief Description of Planned SWMP Action Taken	MDT reviewers will verify that applicable federal, tribal, state and local laws and regulations are followed as required by the Small MS4 Program.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, PDEs
Measurable Goal or Performance Standard Utilized	The measurable goal for this BMP will be for PDEs to review 100% of the plans within the Small MS4s. When applicable, the PDEs will recommend to the design team incorporation of PESC/LID structures.
Quantitative Indicators Used and Results	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. Additionally, a LID Practices Analysis process and form was created for statewide use by the PDEs. The form provides uniformity of the LID analyses to ensure statewide consistent determinations and documentation of "development," "redevelopment," and "practicability." This form is available on the MDT website at: http://www.mdt.mt.gov/other/webdata/external/planning/forms/MDT-ENV-007-Low_Impact_Development_Practice_Analysis.pdf Ten of ten (100%) MDT design projects within MS4 areas at various levels of project development received LID analysis review in 2021. Although MDT's requirement is to incorporate LID practices into the project design as "practicable," MDT and its contractors must also meet the LID requirements of the MS4 where the project will occur.
Impact On SWMP Effectiveness	Verify that applicable federal, tribal, state and local laws and regulations are followed as required by the Small MS4 Program.

SWMP Activity or Component Name	**Construction and Post-Construction Site Inspections BMP-PCRC-02**
Minimum Control Measure Name (If Applicable)	Post-Construction Runoff in New Development and Redevelopment
General Permit Condition Item Number (If Applicable)	II.B.5
Brief Description of Planned SWMP Action Taken	MDT construction personnel inspect the features as they are being constructed to ensure that they are constructed according to the contract documents including the plans and specifications.
Responsible Agency, Department, or Organization; and Person or Position	MDT, DEES, Maintenance and Construction personnel
Measurable Goal or Performance Standard Utilized	MDT construction personnel will inspect structural (permanent) BMPs on 100% of projects in a Small MS4. Before MDT assumes responsibility for a storm water permit from the Contractor, MDT personnel including the DEES, maintenance personnel, and construction personnel, complete a final project closeout inspection to ensure project BMPs (temporary and permanent) are correctly installed and functioning properly. After the project closeout is complete, the BMP maintenance becomes MDT's responsibility. MDT maintenance personnel perform maintenance on the temporary and permanent BMPs as needed. Items that could be improved during the construction phase will be passed on to construction for consideration in future projects.
Quantitative Indicators Used and Results	In 2021, the DEES performed seven final walkthroughs prior to transferring permit responsibilities from the contractor to MDT or local entity, as follows: Billings - 1 Butte – 1 Bozeman - 1 Great Falls – 1 Helena - 1 Missoula – 1 Kalispell – 1
Impact On SWMP Effectiveness	Ensures that features of projects are constructed according to the contract documents including the plans and specifications.

SWMP Activity or Component Name	Operation and Maintenance of BMPs BMP-PCRC-03	Reviewers and Inspectors Training BMP-PCRC-04
Minimum Control Measure Name (If Applicable)	Post-Construction Runoff in New Development and Redevelopment	Post-Construction Runoff in New Development and Redevelopment
General Permit Condition Item Number (If Applicable)	II.B.5	II.B.5
Brief Description of Planned SWMP Action Taken	Evaluate MDT Operation and Maintenance Program to ensure being conducted in an effective manner.	MDT will provide training and guidance material to its employees on environmental compliance and storm water BMPs.
Responsible Agency, Department, or Organization; and Person or Position	MDT, DEES, Maintenance personnel	MDT, MS4 Coordinator, DEES
Measurable Goal or Performance Standard Utilized	Records of the current MDT Operation and Maintenance Program will be reviewed and evaluated to ensure that the O&M of BMPs is being conducted in an effective manner. The evaluation of the Program will be tailored to each MS4 area. Facilities managed by other entities (i.e., county or city) will be their sole responsibility.	MDT will continue to provide training to its employees on environmental compliance and storm water BMPs. Educational programs and specialized training will continue to be made available for individuals involved in the plan review process and for inspection personnel. The MDT-provided training and education programs attended by MDT personnel will be tracked as part of this BMP. Pertinent staff members will attend at least one relevant training session per permit period to develop and expand their skills pertaining to storm water pollution prevention techniques. This training will be available as an online self-review of the PESC guidelines. MDT conducts periodic training on and updates of the PESC Manual as necessary.
Quantitative Indicators Used and Results	No formal recommendations were created for the O&M program. However, a site-specific O&M manual was developed for the KBP-Foys Lake Road interchange project in Kalispell since the project-specific maintenance provisions were not fully captured in MDT's Maintenance Manual. MDT is evaluating criteria for developing site-specific O&M documents moving forward.	Environmental Services Bureau personnel coordinated with MDT hydraulics and road design on 9/28/21 to discuss development of a formal PESC training program. This training topic has been added to engineering's training budget and a formal PESC training program is targeted for 2022.
Impact On SWMP Effectiveness	Opportunity to ensure an accurate BMP installation and to use the information gathered in evaluating improvements in future BMP installations or maintenance activities.	Provide educated staff.

SWMP Activity or Component Name	**Low Impact Development Approach** **BMP-PCRC-05**
Minimum Control Measure Name (If Applicable)	Post-Construction Runoff in New Development and Redevelopment
General Permit Condition Item Number (If Applicable)	II.B.5
Brief Description of Planned SWMP Action Taken	MDT will attempt to incorporate LID techniques where practicable in MDT 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, MS4 Coordinator, PDEs
Measurable Goal or Performance Standard Utilized	For road construction projects in MS4 areas, MDT will evaluate 100% of designs for the potential of incorporating LID techniques. When the requirements are triggered (i.e., a new development or redevelopment project that disturbs 1 acre or more), LID opportunities will be explored. PDEs will be the lead on this effort and will provide data to the MS4 Coordinator for tracking. For "state actions" at MDT facilities within Small MS4 areas, MDT will evaluate 100% of designs for appropriateness of incorporating LID techniques. Each proposed project will be reviewed for triggering the requirements for incorporating LID, as practicable. When the requirements are triggered, LID opportunities will be explored. PDEs will be the lead on this effort and will provide data to the MS4 Coordinator for tracking. For encroachment and approach permit applications within Small MS4 areas, MDT will evaluate 100% of applications for appropriateness of incorporating LID techniques. Appropriate MS4-related information will be included in the permit issuance correspondence. PDEs will be the lead on this effort and will provide data to the MS4 Coordinator for tracking.
Quantitative Indicators Used and Results	For federal-aid construction projects in MS4 areas, the LID Practices Analysis process and form was created for statewide use by the PDEs. The form provides uniformity of the LID analyses to ensure statewide consistent determinations of and documentation of "development," "redevelopment," and "practicability." This form is available on the MDT website at: http://www.mdt.mt.gov/other/webdata/external/planning/forms/MDT-ENV-007-Low_Impact_Development_Practice_Analysis.pdf. Ten of ten (100%) MDT design projects within MS4 areas at various levels of project development received LID Analysis review in 2021. Although MDT's requirement is to incorporate LID practices into the project design as "practicable," MDT and its contractors must also meet the LID requirements of the MS4 where the project will occur. For encroachment and approach permit applications within Small MS4 areas, after the development of the SWMP and this commitment, it was determined that its inappropriate for MDT to evaluate the proposed developer actions in encroachment and approach permit applications for incorporation of LID practices. Instead, all encroachment and approach permit applications have an impacts analysis documented in an Environmental Checklist (ENV-006) that are reviewed by the PDEs. PDEs include a stipulation in the permit application evaluation that applicable MS4 requirements must be met, effectively placing the responsibility for the LID applicability analysis on the project proponent.
Impact On SWMP Effectiveness	Incorporation of PESC/LID measures where practicable.

SWMP Activity or Component Name	Ordinances and Storm Water Design Criteria BMP-PCRC-06	Vegetation Management Program BMP-PCRC-07
Minimum Control Measure Name (If Applicable)	Post-Construction Runoff in New Development and Redevelopment	Post-Construction Runoff in New Development and Redevelopment
General Permit Condition Item Number (If Applicable)	II.B.5	II.B.5
Brief Description of Planned SWMP Action Taken	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. MDT follows applicable federal, tribal, state and local laws and regulations within the Small MS4s.	Evaluate projects within Small MS4s that have open SWPPP permits for use of federal funds to conduct further revegetation that promotes closure of the SWPPP plans.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, PDEs, DEES	MDT, DEES, Botanist
Measurable Goal or Performance Standard Utilized	MDT will continue to follow federal, tribal, state and local laws and regulation and design standards. MDT will maintain and follow its design criteria for PESC and LID measures or seek formalized design exceptions for 100% of our projects within Small MS4s.	This BMP will be measured by comparing projects within the Small MS4s with open SWPPP permits. A determination will be made if improvement to the control of storm water run-off, and infiltration can be improved with further re-vegetation. The open permit projects and the projects that are closed will be tracked as well as the projects where funding was allocated within the Small MS4s.
Quantitative Indicators Used and Results	MDT projects currently being designed within the MS4 Area are undergoing continuous PESC/LID evaluation in accordance with the MS4 permit. Ten of ten (100%) MDT design projects within MS4 areas at various levels of project development received LID Analysis review in 2021.	In 2021, no projects were identified within MS4 Areas as needing vegetation improvement with the Federal Revegetation Management Program.
Impact On SWMP Effectiveness	Ensures compliance with all applicable laws, regulations and design standards.	Promotes effective stabilization and closure of SWPPPs.

SWMP Activity or Component Name	**Training** **BMP-PPGH-01.1**
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, SWPPPs, FPPPs, and the SPCC Plans
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES
Measurable Goal or Performance Standard Utilized	a) This BMP will be measured by ensuring that 100% of the DEES and MDT Maintenance staff performing SWPPP inspections in Small MS4s comply with the construction general permit and will have Certified SWPPP Administrator training/certification. Records will be kept of personnel who have taken the SWPPP Administrator training and passed the test to become an MDT Certified SWPPP Administrator. b) This BMP will be measured by ensuring that 100% of the Maintenance staff performing site-specific FPPP inspections in MS4s have site specific FPPP training. Records will be kept of personnel who have received training on the site-specific FPPP inspection procedures. c) The DEES will provide a presentation regarding storm water issues during at least one EPM meeting per year. The presentation will be a discussion of current storm water issues and an opportunity for questions regarding storm water issues related to design and construction activities. d) The DEES will provide a presentation during at least one MDT maintenance section man meeting per year. The presentation will include a discussion of current storm water control issues and an opportunity for questions regarding storm water control related to maintenance activities and facilities.
Quantitative Indicators Used and Results	a) MDT staff performing SWPPP inspections have completed SWPPP administrator training. MDT updated its online SWPPP Administrator training for MDT maintenance personnel in November 2019. Twenty-four maintenance personnel participated in the online SWPPP training in 2021. Additionally, one new DEES, the SEES, and the Reclamation Specialist attended BMP 101/201 trainings in 2021 receiving SWPPP Administrator certification, and the Field Services Engineer was recertified. b) A formal FPPP Update and Training procedure to ensure maintenance personnel receive storm water training specific to each facility was issued in March of 2021. Maintenance personnel performing FPPP inspections have received site-specific FPPP training. New maintenance personnel in the Bozeman MS4 received on-site FPPP training from DEES on 5/15/2021. c) The DEES attended their respective district EPM meetings on the following dates and presented storm water information: Missoula District (Missoula, Kalispell MS4s) - 03/5/2021 Butte District (Bozeman, Butte MS4s) – 4/1/2021, 6/18/2021, 9/28/2021 Billings District (Billings/Yellowstone County MS4) – 3/30/2021 The EPM meeting was not attended in the Great Falls District (Great Falls and Helena MS4s) due to new DEES becoming familiar with program requirements. The Great Falls DEES has been added to the EPM meeting invite for 2022, however.

	d) The DEES provided training at MDT maintenance staff meetings on various stormwater 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: 12/22/2021 Butte/Bozeman/Helena: 12/9/2021, 12/14/2021 Missoula: 6/16/21, 10/20/21 Great Falls: 7/20/2021 Kalispell: 10/21/2021
Impact On SWMP Effectiveness	To have educated staff regarding storm water characteristics, water quality issues, and individual responsibilities regarding the implementation of the Statewide SWMP, the FPPPs, and SPCC Plans.

SWMP Activity or Component Name	**Training** **BMP-PPGH-01.2**
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, SWPPPs, FPPPs, and the SPCC Plans.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES
Measurable Goal or Performance Standard Utilized	a) ESB personnel, generally the Engineering Section Supervisor or the Field Services Engineer, will attend at least one quarterly DCE meeting per year and provide information related to MDT's overall storm water management program, including MS4 issues. b) ESB personnel, generally the Engineering Section Supervisor or the Field Services Engineer, will attend at least one quarterly Maintenance Chiefs meeting per year and provide information related to MDT's overall storm water management program, including MS4 issues. c) As previously identified, several MDT facilities in MS4 areas fall under the SPCC Rule and have SPCC Plans. SPCC training, which includes information related to the MS4 Program, will be offered annually or according to SPCC requirements. d) As previously described, MDT is working to develop site-specific FPPPs for MDT facilities within MS4 areas that currently do not have FPPPs. Training is offered on each site specific FPPP upon completion of the plan. Additional training will be offered when the plan is amended or on an as needed basis, as necessary. Dates, name, and responsibility of staff members, as well as topics discussed, will be tracked on a spreadsheet as part of this measurable goal.
Quantitative Indicators Used and Results	a) The Environmental Engineering Section Supervisor attended and presented on MS4 in a DCE meeting on 3/23/2021. b) Neither the Environmental Engineering Section Supervisor nor the FSE attended a Maintenance Chiefs meeting in 2021. However, a separate meeting has been set up with Maintenance to discuss MS4 requirements in January 2022. c) SPCC Training occurred in Billings and Missoula MS4s and review of the SPCC plans at MDT facilities occurred per SPCC requirements. There were no updates to the SPCC plans in 2021. d) All MDT facilities located in MS4s have FPPPs implemented that address storm water controls. A formal FPPP Update and Training procedure to ensure FPPPs are formally updated on a routine basis and that maintenance personnel receive storm water training specific to each facility was issued in March of 2021.
Impact On SWMP Effectiveness	To have educated staff regarding storm water characteristics, water quality issues, and individual responsibilities regarding the implementation of the Statewide SWMP, SWPPPs, and SPCCs.

SWMP Activity or Component Name	**Periodic SWPPP and SPCC Plan Inspections** **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	MDT will perform site inspections for MDT facilities within the Small MS4s with FPPP and SPCC plans on the time basis documented in the SWMP.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES, Maintenance staff
Measurable Goal or Performance Standard Utilized	The DEES and MS4 Coordinator will analyze the FPPP inspection forms on a yearly basis to evaluate opportunities to improve and deal with identified deficiencies. In some cases, funds will have to be secured to improve the current infrastructure and might require several years before the BMP can be fully implemented.
Quantitative Indicators Used and Results	The monthly FPPP inspection reports for each of the MDT facilities located in MS4s are compiled in an annual summary reporting form. An initial review of this form takes place in January of each year and is used to determine if there are opportunities for improvement. The Environmental Engineering Section Supervisor and Field Services Engineer are currently evaluating 2021 annual FPPP reviews and will be identifying BMP funding priorities for 2022.
Impact On SWMP Effectiveness	Identify potential opportunities for improvements and small procedural changes that could positively impact potential storm water contamination.

SWMP Activity or Component Name	**Road and Parking Sweeping** **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	Implement a Street Sweeping Program that encompasses the streets and roadways, the maintenance yards and parking areas within its facilities. The street sweeping frequency depends on need and travel volumes. Sweepers also respond to certain types of spills that require clean-up work.
Responsible Agency, Department, or Organization; and Person or Position	MDT, Maintenance Staff
Measurable Goal or Performance Standard Utilized	MDT's goal for the street sweeping program is to sweep 100% of the facilities and MDT maintained roads that are within our permitted Small MS4s a minimum of one time per year.
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 2021. The breakdown obtained from MDT Maintenance Division for miles swept in each MS4 is as follows: Missoula*: 318 miles Kalispell: 412 miles Butte: 125 miles Bozeman*: 8 miles Great Falls: 289 miles Helena: 666 miles Billings/Yellowstone County: 433 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 to do most of the sweeping.*
Impact On SWMP Effectiveness	Remove pollutants from entering water ways.

SWMP Activity or Component Name	Road and Parking Area Maintenance BMP-PPGH-04	Winter Maintenance Program BMP-PPGH-05
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	MDT will follow its Roadway / Roadside Maintenance Program to maintain roadways / roadsides for safety, to protect the environment, and to maintain a pleasing aesthetics in a functional manner.	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, MS4 Coordinator, DEES, Maintenance Staff	MDT, MS4 Coordinator, Maintenance Chiefs
Measurable Goal or Performance Standard Utilized	MDT will evaluate current practices used during maintenance and operational activities to determine if modifications to these practices are warranted to minimize storm water pollutants reaching water ways. The evaluation of BMPs and procedures as well as suggestions will be documented to determine the best course of action to implement improvements as the measurable goal for this BMP. Cost, ease of implementation, and risk and benefit analysis will be taken into account to make recommendations to MDT management.	MDT will evaluate the current procedures described in the Winter Maintenance Program and if necessary, revise the existing manuals to reduce the potential of pollutants being discharged into the environment and consequently into waterways. The evaluation will be performed during the permit period, and revisions to the manuals will be posted on the MDT intranet.
Quantitative Indicators Used and Results	MDT continued to maintain roadways throughout 2021 to ensure safe passage while protecting the environment. MDT will continue to evaluate the BMP to identify a systematic approach to gathering and reviewing the maintenance information.	MDT Maintenance Division is continuing the process of updating the Maintenance Manual. ESB Management has contributed information to this update. The updates are anticipated to be finalized in 2022.
Impact On SWMP Effectiveness	Allow for improvements in the program where practicable.	Small changes to these activities will have positive impacts in reducing potential contaminants that could be transported into state waterways.

SWMP Activity or Component Name	Recycling Activities BMP-PPGH-06	Vehicle Washing BMP-PPGH-07
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	MDT has several recycling programs in place at the maintenance facilities within the Small MS4s. These programs will continue to be offered.	To evaluate the vehicle wash areas and procedures to minimize discharge of pollutants into surface water.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES, Maintenance staff	MDT, MS4 Coordinator, DEES, Maintenance Staff
Measurable Goal or Performance Standard Utilized	MDT will continue to recycle and burn the used oil to heat select MDT facilities. MDT will also continue to recycle scrap and unused metal through the recycling companies throughout the permit period. MDT has created FPPPs that provide guidelines to help make the storage of the recycled materials storm water runoff safe. MDT will be inspecting the facilities on a monthly basis to ensure the recycled materials are being stored in a manner that protects storm water runoff.	MDT will evaluate each maintenance facility for short-term improvements (e.g., sweeping area at the end of the shift) and long-term improvement (e.g. a new wash bay). The short-term improvements will be implemented as soon as possible, while the long-term improvements will require additional planning and funding. In 2013, MDT completed one long-term goal of constructing an updated wash bay at the Missoula MDT maintenance facility capable of appropriately disposing of wash water. MDT currently has funding available to hire a consultant in 2014 to design new wash bays for MDT Maintenance facilities in Butte, Great Falls, Billings, and Bozeman. MDT currently plans to construct the new wash bays in Butte in State fiscal year 2014 and in Great Falls and Bozeman in State fiscal year 2015. Additional short-term and long-term improvements may be implemented and will be tracked for each facility as a measure of this goal during the permit period.
Quantitative Indicators Used and Results	MDT facilities recycled paint, metals and used oils in 2021. State agencies are mandated to recycle scrap metal using a DOA contract with Pacific Steel and Recycling. FPPP updates, training, and inspections include storage areas for both recycled materials and used oil. MDT facilities were inspected monthly in 2021.	In 2016, MDT Environmental budgeted funds for use in building wash bays at the Butte, Great Falls, and Billings maintenance facilities. The Great Falls and Butte wash bays were constructed; however, construction of the Billings wash bay continues to be delayed due to geotechnical concerns. Short-term and long-term facility improvement recommendations have been documented in annual FPPP review forms and shared with maintenance.
Impact On SWMP Effectiveness	Recycling of motor oil as well as unusable or scrap metal reduces potential pollutant discharges while encouraging the proper disposal of these materials.	Minimizes the potential discharge of pollutants into surface waters.

SWMP Activity or Component Name	Hazardous Waste Handling BMP-PPGH-08	Material Management BMP-PPGH-09
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	Limit the amount and type of hazardous materials on MDT sites, how and where they are stored, and who has access to them.	MDT will continue to stockpile and store materials, such as oils and deicing materials, in a manner to reduce the likelihood of accidental spills or release hazardous materials into the storm water system.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES, Maintenance staff	MDT, MS4 Coordinator, DEES, Hazmat section, and Maintenance staff
Measurable Goal or Performance Standard Utilized	MDT will continue to ensure that its staff is following the proper procedures when handling and storing hazardous materials and are well informed of the type and potential dangers associated with each chemical. SDSs are available at each facility within the MS4 and staff comply with the requirements of the SPCC Plans including monthly site inspections. MDT will evaluate the plans as revised by federal and state regulations. Staff will complete monthly inspection forms. The MS4 Coordinator working with the Hazmat Supervisor, DEES, and FSE will determine if items in the inspection process need to be amended based on data provided in inspection forms. The measurable goal for this BMP will be to maintain MDT's status of conditionally exempt.	MDT will review existing storage procedures to ensure they are current and effective. Revisions will be posted, and employees will be made aware of the changes. This BMP will be measured by the number of spills that are reported within a permit period as required by the FPPP and SPCC Plans. The main goal is to eliminate spills and have zero reported spills during the permit period. If a spill is reported within a permit period, corrective actions will be taken to remedy the spill and preventive measures will be put into place to prevent the spills from reoccurring.
Quantitative Indicators Used and Results	In 2021, MDT maintained the status of conditionally exempt at MDT facilities in MS4 areas.	In 2021, no spills at MDT maintenance facilities in MS4 areas triggered reporting requirements as outlined in either the FPPP or SPCC.
Impact On SWMP Effectiveness	Limits types and amounts of hazardous materials located at MDT facilities.	These practices are measures that help prevent contaminants from entering the storm water system and consequently pollute surface water.

SWMP Activity or Component Name	Storm Drain System Cleaning and Maintenance BMP-PPGH-010	Develop SWPPPs and Updates to SWPPPs BMP-PPGH-11
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	Conduct routine system inspections, cleaning, and maintenance of MDT maintenance facilities, yards, and storm water infrastructure within the MDT right of way.	MDT has developed FPPPs for MDT facilities within the Small MS4s. MDT will update with necessary amendments.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES, Maintenance staff	MDT, MS4 Coordinator, DEES, Maintenance staff
Measurable Goal or Performance Standard Utilized	MDT will continue the current maintenance program and track the number of inspections, cleanings, and repairs conducted at each maintenance facility as well as continue maintenance conducted on MDT's right of way within the MS4 areas. MDT tracks hours and supplies in the Management System for each MS4 area. MDT will clean and provide maintenance to storm water structures as necessary. The need is determined from the inspections taking place as a regular part of the maintenance department employees' job duties. Other forms of notification can be from the public, city or county employees.	MDT will continue to evaluate and update the FPPPs as conditions change regarding design, construction, operation, or maintenance at different facilities. The changes will be recorded in the Amendment Record Log included in each FPPP. In addition, MDT will continue to train its staff to better understand the implications of contaminating storm water and procedures to reduce the potential of contamination. In 2014, MDT will create FPPPs, implement, and begin monthly inspections for the following locations: MDT Rest Area, Bozeman, DeSmet, Missoula, and Aeronautics Division (York Wye), Helena. In addition, MDT staff will complete the monthly FPPP inspection forms at the currently existing FPPP locations. FPPP inspections will be reviewed and analyzed by the MS4 Coordinator annually for the annual report. The forms, addendums, and training will be the measurable goal for this BMP.
Quantitative Indicators Used and Results	MDT conducted monthly FPPP inspections at MDT facilities within MS4 areas in 2021. This BMP will continue to be evaluated to determine a better systematic approach to gather and review information.	All MDT facilities within MS4 boundaries have a FPPP and monthly FPPP inspections were conducted. The DEES also conducted annual FPPP reviews for these facilities. These annual FPPP reviews include a catalog of needed FPPP updates, as well as recommendations for short- and long-term BMP improvements. The Environmental Engineering Section Supervisor and Field Services Engineer are currently evaluating 2021 annual FPPP reviews and will be identifying BMP funding priorities for 2022. Additionally, MDT finalized its FPPP Update and Training procedure in 2021 and initiated updates to each of MDT's existing FPPPs and associated inspection checklists. MDT will finalize the FPPP updates in 2022 and offer site-specific FPPP training to maintenance personnel.
Impact On SWMP Effectiveness	Maintain existing MDT system capacity and improve water quality.	Ensure uniform inspections of all MDT facilities within MS4 areas.

APPENDIX P

ADDITIONAL DETAILED INFORMATION: PLANNED ACTIVITES AND CHANGE DURING NEXT YEAR

MDT applied for an MPDES individual MS4 permit in November 2014. To date, this permit has not been issued. Accordingly, one of the main focuses of MDT's MS4 program is to coordinate with DEQ for issuance of a mutually acceptable individual MS4 permit. Once this permit is issued, MDT will amend the SWMP and associated BMPs to facilitate compliance with new permit conditions and to further aid in MDT's continued improvement in environmental performance related to water quality. In the interim, MDT intends to update its SWMP in 2022 to include anticipated future permit requirements. Opportunities for improvement that are identified below may be further adjusted once the SWMP updates are finalized and/or the MPDES permit is issued.

SWMP Activity or Component Name	**Printed Media BMP-PEO-01**	**Web Sites and Social Media Sites BMP-PEO-02**
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	Make printed media available to the public.	Post storm water specific information on MDT online sources including MDT Intranet (for MDT employees), MDT internet (for roadway users), and Facebook (for roadway users).
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, Public Info Officer, DEES	MDT, MS4 Coordinator
Measurable Goal or Performance Standard Utilized	MDT will track, in a spreadsheet, the printed media types that were generated, the number of brochures, pamphlets, and other printed media distributed as well as the dates and locations where the printed media was handed out. At the end of the permit period, the MS4 Coordinator will compile the information recorded. MDT will distribute 5% more printed educational material than the prior year. A MS4 related article will post once a year in MDT's Rail, Transit & Planning Division newsletter the 'Newsline'.	This BMP will be measured by several means. First, the amount of feedback received from the Montana MS4 website, which has a link to allow comments to be emailed to MDT, will be tracked. The MDT MS4 Coordinator will post at least four status updates related to storm water, water quality, and other MS4 issues on the MDT social media site (i.e. Facebook) each year. This BMP will be measured by the number of subscribers to the MDT site and by the "likes" and "comments" associated with the posts. This BMP will also be measured by the continued development of the MDT internal MS4 website during the year 2014.
Opportunity for Improvement	As noted in previous annual reports and continuing in 2022, MDT is focusing less on printed material and more on social media interactions. This BMP is being phased out. In addition to the website, MDT will continue using both Facebook and Instagram social media platforms for public education and outreach.	-In 2021, posts were developed for IDDE. In 2022, new posts will be developed for winter maintenance practices and stormwater control. -MDT's MS4 intranet page will be updated to include additional storm water resources, recent training presentations, audit results, and a catalog of previous Facebook and Instagram posts.

SWMP Activity or Component Name	Public Events BMP-PEO-03	Guidance Manuals and Educational Materials BMP-PEO-04.1
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	To reach target audiences by providing or sponsoring presentations in schools and universities, conferences, retirement communities, civic clubs, libraries, businesses, and association meetings.	Make a variety of guidance manuals and educational materials accessible through the MDT website.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, Public Info Officer, DEES	MDT, MS4 Coordinator, DEES
Measurable Goal or Performance Standard Utilized	MDT's Statewide MS4 Coordinator will participate in at least one public event each year to promote the Statewide MDT MS4 Program. In addition, the DEES will attend at least one public event each year to promote the storm water management program efforts in each MS4 area. Events may include storm water conferences, Storm Water Awareness Week, Montana State Fair, local Science Fairs, Earth Day, educational booths and presentations at schools and universities. MDT will track the number of events attended by MDT personnel, the date and location of events, and if possible, the number of event participants. The information will be compiled at the end of the permit period to determine its effectiveness for educating the public.	In 2014, a link will be added to the Montana MS4 website (http://montanaMS4.com) to take the user to MDT's guidance and educational manuals. The first measurable goal will be to perform an annual review by the MS4 Coordinator of the internal and external MDT websites to verify that the links to the reference materials are accurate and up to date.
Opportunity for Improvement	MDT is striving for higher efficiency in MS4 outreach and education efforts by streamlining MS4-related messages to audiences that have an impact on MDT stormwater quality in MS4 areas, such as MDT staff, contractors, developers, and transient roadway users. MDT is developing an outreach strategy for those targeted audiences and an approach for evaluating the effectiveness of the outreach.	MDT has identified updates to be made in 2022 and will continue to focus efforts on maintaining and updating its MS4 intranet page, stormwater internet page, and social media presence.

SWMP Activity or Component Name	Guidance Manuals and Educational Materials BMP-PEO-04.2	Public Forums BMP-PPI-01	Clean-up and Volunteer Events BMP-PPI-02
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	Work with the MDT Librarian to create a collection of stormwater materials available for education and training.	Provide the public the opportunity to comment on storm water concerns through project public meetings, public notices, NEPA/MEPA process, and corridor study process.	Adopt-A-Highway is statewide program administered by MDT 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, MS4 Coordinator	MDT, MS4 Coordinator, DEES, public information personnel	MDT, Adopt-A-Highway program manager, MS4 Coordinator
Measurable Goal or Performance Standard Utilized	The second measurable goal will be completed by the MS4 Coordinator. This measurable goal is to work with the MDT librarian once per year to review MDT's educational materials related to storm water. This review will consist of verifying that the materials available at the MDT library are accurate, adequate, and up to date. New materials will then be acquired as needed and allowed by budgetary constraints.	Compliance with NEPA and MEPA is confirmed through audits. The results of these audits will be used to track this BMP throughout the permit period.	MDT will continue to offer the Adopt-a-Highway program. MDT's current goal for this BMP is to work with the Adopt-a-Highway program manager to assist in the 2016 launching of new interactive online webpage that allows user to click on an adopted road section to see who adoptee is and how many miles adopted. The Adopt-a-Highway compliance tracking will be able to keep track of which sections of roadways by reference posts are adopted, who has adopted them, and how often trash pickup is occurring.
Opportunity for Improvement	The Statewide Environmental Engineer Specialist (SEES) will review materials for applicability and identify any updates needed to the MDT library.	MDT will continue progress on this control measure and will focus on communication through existing electronic media such as the MDT social media pages.	-MDT will investigate adding the interactive Adopt-a-Highway mapping information to its MS4 maps. -MDT will pilot a Sponsor-A-Highway project in Billings, which allows an entity to sponsor a section of highway and pay for cleanup. If successful, MDT will consider adding this BMP to MS4 program.

SWMP Activity or Component Name	Feedback BMP-PPI-03	Storm Water System Mapping BMP-IDDE-01
Minimum Control Measure Name (If Applicable)	Public Involvement/ Participation	Illicit Discharge Detection and Elimination (IDDE)
General Permit Condition Item Number (If Applicable)	II.B.2	II.B.3
Brief Description of Planned SWMP Action Taken	The public can provide feedback using several different methods. MDT will address this feedback and incorporate the feedback where appropriate.	A statewide effort to map MDT's storm water system.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, and other MDT Staff as applicable	MDT, MS4 Coordinator, DEES
Measurable Goal or Performance Standard Utilized	On MDT's social media sites, the MS4 Coordinator will make at least four announcements per year. MDT will continue to solicit feedback through work group discussions, website comments, phone calls, written e-mails or letters, training evaluations, surveys, public comment periods, and personal interactions. The MS4 Coordinator will use a spreadsheet to keep track of the amount and type of feedback received. The MS4 Coordinator will evaluate the BMPs progress based on the amount and type of feedback received via available sources. The MS4 Coordinator will use the feedback received to create updates and revisions to the storm water program on an as needed basis to increase the amount of feedback and public interaction received.	The statewide MS4 Coordinator will continue to update each Small MS4 storm water system map on an annual basis and will make the updated maps available in electronic format upon request. These Small MS4 maps will be available online in 2014. MDT will solicit information from cities and counties to ensure that the information is as accurate as possible. MDT will also share new project information with co-permittees upon request. Updates include areas of new development or infrastructure improvements, as well as those areas where new information becomes available during maintenance activities. In addition, MDT will revise the Small MS4 boundaries based on city limit changes and census information on a yearly basis if these two items have changed. This BMP's success will be based on the MS4 maps being updated with new information, and 25% of inlets being mapped in 2014. Over the permit cycle starting in 2015, MDT will collect and map our inlets, open channels, and subsurface conduits/pipes, dry wells, and other similar storm water conveyances.
Opportunity for Improvement	MDT will continue progress on this control measure. New Facebook and Instagram messages will be tailored to request specific feedback on stormwater impacts and controls related to MDT's facilities. Additionally, a SWMP feedback form will be added to MDT's internet and intranet pages to aid in documenting the feedback received.	In 2022, MDT will continue the process of confirming and updating its MS4 maps. Updated outfall information will be reviewed and coordinated with MDEQ and other MS4s. Mapping guidance specific to inlets and other storm water conveyances will be developed and data collection for open channels, subsurface conduits/pipes, drywells and other similar storm water conveyances will continue. The collected data will be displayed online using an interactive mapping tool instead of the static, hard-copy maps used previously.

SWMP Activity or Component Name	Dry Weather Screening BMP-IDDE-02	Storm Water Ordinances BMP-IDDE-03
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	Monitoring of outfalls within the MDT jurisdiction by use of both dry weather screening and visual observation.	MDT will follow local ordinances, statutes, and regulations within the Small MS4s. MDT will notify the proper enforcement authority available in the select Small MS4 that has an existing storm water ordinance in place.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES, FSE, and Maintenance Staff	MDT, MS4 Coordinator, DEES, and construction inspectors
Measurable Goal or Performance Standard Utilized	The DEES is responsible for performing the dry weather screening at each outfall once per permit cycle. The information they gather will be used to update both the dry weather screening form along with the tracking spreadsheet in 2014. The IDDE Program protocols will be made available on the MDT website. The number of illicit or illegal discharges reported to the MS4 Coordinator will be analyzed and compared to previous years. MDT will also track the date, the outfall location, the response action, and the outcome of the implementation of such actions. Success of this BMP will be to eliminate 100% of illicit or illegal discharges from MDT operations.	Because MDT does not have legal authority to establish ordinances, it will rely on other governmental bodies to add ordinances and regulation to the existing standards that help eliminate illicit or illegal discharges into state water bodies. For applications within the Small MS4, MDT will continue to list in right of way approach and encroachment permits that applicants are expected to follow local ordinances, which include the city MS4 ordinances. As part of this measurable goal, MDT will follow applicable ordinances, and report non-compliance to the appropriate authorities. MDT will evaluate the local agreements with co-permittees at the end of this permit cycle. In addition, MDT will continue to follow the *Escalation Plan* spelled out in Management memo 03-01 that will be made available in electronic format on the MDT website in the year 2014.
Opportunity for Improvement	In 2022, MDT will identify high priority areas/outfalls in all MS4s and implement its updated MS4 dry weather screening process to include corrective actions and enforcement as necessary to eliminate illicit discharges and to include an evaluation of the dry weather screening outcomes (i.e., identify trends).	In 2022, MDT intends to train staff on the Enforcement Response Plan and IDDE Investigation and Corrective Action Plan that were developed in 2021.

SWMP Activity or Component Name	Public Education on IDDE BMP-IDDE-04	Training BMP-IDDE-05
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	MDT currently provides information on possible illicit and illegal discharges in our printed education material. MDT will continue to provide this information.	Provide district personnel with IDDE training specific to their job duties.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, and other MDT staff	MDT, MS4 Coordinator, DEES
Measurable Goal or Performance Standard Utilized	MDT will track, when possible, the number of calls, emails, or postings on MDT's social media sites. A reporting spreadsheet will be generated in 2014 by the MS4 Coordinator. Information provided during the reporting will be entered into the spreadsheet. The action taken by MDT to resolve the problem will also be included in the spreadsheet. When available, MDT will record how the information was acquired. MDT will use this information to evaluate the highest used method of reporting. Reporting methods not being used will be evaluated to determine if changes can be made to improve its effectiveness. The number of reports will determine if having a public reporting system is effective. The results will be presented in each Annual Report. The MS4 Coordinator will be posting status updates on MDT's social media (i.e. Facebook) page. One of these posts will be related to IDDE.	This training will be part of the IDDE Training Program and will be performed annually for key personnel. MDT will track the date, location and employees trained each year as part of the IDDE Training Program at each Small MS4. Success will be determined by ensuring up to date training material and employees requesting the training receive the training.
Opportunity for Improvement	-IDDE-specific posts targeting illegal dumping will continue to be developed. -A SWMP feedback form will be added to MDT's internet and intranet pages to aid in documenting the feedback received. -MDT will investigate possibility of developing an online reporting tool specific to IDDE.	In 2022, MDT will provide training to environmental staff on the new processes outlined in the Enforcement Response Plan and IDDE Investigation and Corrective Action Plan that were developed in 2021.

SWMP Activity or Component Name	Construction SWPPP BMP-CSRC-01	MDT Environmental and Construction Oversight BMP-CSRC-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	At construction sites that are required to obtain an MPDES General Permit for Storm Water Discharges associated with Construction Activity, the contractors must prepare a SWPPP.	To provide environmental and construction oversight on MDT projects. To ensure compliance with federal, tribal, state, and local laws.
Responsible Agency, Department, or Organization; and Person or Position	MDT, PDE	MDT, DEES, and project personnel
Measurable Goal or Performance Standard Utilized	MDT continues to place the special provision in project contracts that require contractors on construction sites disturbing 1 acre or equal to adhere to the MPDES General Permit for Storm Water Discharges associated with Construction Activity. The measurable goal for the BMP is that project contracts have the MPDES Special Provision.	This BMP will be measured by the number of inspections conducted during the permit period. In addition, deficiencies will be tracked by project, as well as the actions taken to remedy the issues. The deficiencies and actions will be used as training tools to improve inspection procedures and to train DEES and inspection personnel for future MDT projects. MDT will track the size of project and compliance record of the contractors and subcontractors to evaluate if the environmental plans and specifications are meeting the requirements of the Construction General Permit and protecting the state's water quality. MDT staff will inspect 100% of projects within the Small MS4. The DEES attend, send a designee, or communicate directly with the project manager prior to100% of the Pre-Construction conferences for construction projects within the Small MS4s.
Opportunity for Improvement	MDT finalized and distributed guidance for Plans, Specifications, and Estimate (PS&E) package reviews in February 2021 to ensure inclusion of storm water special provisions in contract documents and demonstrated that it was 100% effective for new projects in 2021. MDT will evaluate in 2022 to ensure its continued effectiveness.	MDT will explore the possibility of tracking MS4 project information through AASHTOWARE to better confirm adherence to MDT's February 2016 MS4 Construction and Post-Construction DEES Inspection Procedures. In addition, MDT will explore ways to evaluate trends and demonstrate effectiveness of MDT's inspection program.

SWMP Activity or Component Name	MDT Information Analysis BMP-CRSC-03	MDT Training BMP-CSRC-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	Evaluate information gathered to improve awareness and enhance current programs.	Provide trained staff responsible for the implementation, maintenance, and inspection of the storm water program. MDT personnel will be trained in the selection, implementation, inspection and maintenance of storm water BMPs.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES	MDT, MS4 Coordinator, DEES
Measurable Goal or Performance Standard Utilized	The MS4 Coordinator will attend five workgroup meetings per year. These meetings may be with co-permittees, other water quality groups, or MDT staff to discuss beneficial ways to improve storm water quality. The DEES will attend at least one MDT maintenance section meeting per year for each Small MS4.	The MS4 Coordinator will maintain a log with the dates of MDT training sessions, including the online SWPPP administrator certification. Names of attendees, their departments and their responsibilities will be included on the logs. Feedback provided during the training sessions will also be tracked to improve procedures and guidelines. Data for this log will be provided to the MS4 Coordinator through the DEES at each Small MS4. The DEES will present during at least one EPM meeting per year. The presentation will be a discussion of current storm water issues and will provide an opportunity for storm water questions related to design and construction activities.
Opportunity for Improvement	-MDT environmental field services unit staff will attend the MT Stormwater Conference in 2022 to discuss and identify beneficial ways to improve the program and water quality. -The DEES will solicit feedback during maintenance section meetings utilizing the SWMP feedback form developed in 2021.	-The DEES will solicit feedback during EPM meetings utilizing the SWMP feedback form developed in 2021.

SWMP Activity or Component Name	Internal Project Administration BMP-CSRC-05	Plan Reviews BMP-PCRC-01
Minimum Control Measure Name (If Applicable)	Construction Site Runoff Control	Post-Construction Runoff in New Development and Redevelopment
General Permit Condition Item Number (If Applicable)	II.B.4	II.B.5
Brief Description of Planned SWMP Action Taken	MDT will use contractual agreements to ensure that projects are constructed in a manner that complies with the Clean Water Act.	MDT reviewers will verify that applicable federal, tribal, state and local laws and regulations are followed as required by the Small MS4 Program.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, PDEs	MDT, MS4 Coordinator, PDEs
Measurable Goal or Performance Standard Utilized	MDT will include the MS4 special provision in 100% of contracts taking place in a Small MS4. In 100% of the contracts in a Small MS4, MDT will include standard and/or special provisions requiring appropriate storm water pollution prevention and acquisition of necessary permits prior to the commencement of construction activities. The MS4 Coordinator will track projects let to contract each year in Small MS4s and will ensure appropriate standard and special provisions are included in each of the contract documents.	The measurable goal for this BMP will be for PDEs to review 100% of the plans within the Small MS4s. When applicable the PDEs will recommend to the design team incorporation of PESC/LID structures.
Opportunity for Improvement	MDT finalized and distributed guidance for Plans, Specifications, and Estimate (PS&E) package reviews in February 2021 to ensure inclusion of storm water special provisions in contract documents and demonstrated that it was 100% effective for new projects in 2021. MDT will evaluate in 2022 to ensure its continued effectiveness.	-MDT will Coordinate with MDT Hydraulics to formalize processes associated with runoff reduction requirements for post-storm water management controls and finalize the LID analysis form. -MDT will continue investigation of PESC Manual updates and training opportunities in 2022, in coordination with MDT Hydraulics and Road Design personnel.

SWMP Activity or Component Name	Construction and Post-Construction Site Inspections BMP-PCRC-02	Operation and Maintenance of BMPs BMP-PCRC-03
Minimum Control Measure Name (If Applicable)	Post-Construction Runoff in New Development and Redevelopment	Post-Construction Runoff in New Development and Redevelopment
General Permit Condition Item Number (If Applicable)	II.B.5	II.B.5
Brief Description of Planned SWMP Action Taken	MDT construction personnel inspect the features as they are being constructed to ensure that they are constructed according to the contract documents including the plans and specifications.	Evaluate MDT Operation and Maintenance Program to ensure being conducted in an effective manner.
Responsible Agency, Department, or Organization; and Person or Position	MDT, DEES, Maintenance and construction personnel	MDT, DEES, Maintenance personnel
Measurable Goal or Performance Standard Utilized	MDT construction personnel will inspect structural (i.e. permanent) BMPs on 100% of projects in a Small MS4. Before MDT assumes responsibility for a storm water permit from the Contractor, MDT personnel including the DEES, maintenance personnel, and construction personnel, complete a final project closeout inspection to ensure project BMPs are correctly installed and functioning properly. After the project closeout is complete, the BMP maintenance becomes MDT's responsibility. MDT maintenance personnel perform maintenance on the temporary and permanent BMPs as needed. Items that could be improved during the construction phase will be passed on to construction for consideration in future projects.	Records of the current MDT Operation and Maintenance Program will be reviewed and evaluated to ensure that the O&M of BMPs is being conducted in an effective manner. The evaluation of the Program will be tailored to each MS4 area. Facilities managed by other entities (i.e., county or city) will be their sole responsibility.
Opportunity for Improvement	-MDT will continue to implement its finalization process and document BMP issues in the final walk-through form. -MDT will track issues that are preventing sites from closeout and communicate internally to identify process improvements and reduce MDT efforts and resources to achieve final stabilization. -MDT will establish protocols for identifying high-priority post-construction storm water management controls and develop an inspection frequency determination protocol based upon assigned priority.	-Although the statewide Maintenance Manual was reviewed to ensure that it was appropriate for the general BMPs, further refinement and formalization of the Permanent BMP O&M program implementation process will be evaluated for site-specific O&M requirements and application within each MS4 area. -In 2022, MDT Environmental will establish recurring meetings with Maintenance personnel and continue discussions regarding potential improvements in tracking permanent BMP maintenance actions.

SWMP Activity or Component Name	Reviewers and Inspectors Training BMP-PCRC-04	Low Impact Development Approach BMP-PCRC-05
Minimum Control Measure Name (If Applicable)	Post-Construction Runoff in New Development and Redevelopment	Post-Construction Runoff in New Development and Redevelopment
General Permit Condition Item Number (If Applicable)	II.B.5	II.B.5
Brief Description of Planned SWMP Action Taken	MDT will provide training and guidance material to its employees on environmental compliance and storm water BMPs.	MDT will attempt to incorporate LID techniques where practicable in MDT 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, MS4 Coordinator, DEES	MDT, MS4 Coordinator, PDEs
Measurable Goal or Performance Standard Utilized	MDT will continue to provide training to its employees on environmental compliance and storm water BMPs. Continued educational programs and specialized training will continue to be made available for individuals involved in the plan review process and for inspection personnel. The MDT-provided training and education programs attended by MDT personnel will be tracked as part of this BMP. Pertinent staff members will attend at least one relevant training session per permit period to develop and expand their skills pertaining to storm water pollution prevention techniques. This training will be available as an online self-review of the PESC guidelines. MDT conducts periodic training on and updates of the PESC Manual as necessary.	For road construction projects in MS4 areas, MDT will evaluate 100% of designs for the potential of incorporating LID techniques. When the requirements are triggered (i.e., new development or redevelopment project that disturb 1 acre or greater), LID opportunities will be explored. PDEs will be the lead on this effort and will provide data to the MS4 Coordinator for tracking. For "state actions" at MDT facilities within MS4 areas, MDT will evaluate 100% of designs for appropriateness of incorporating LID techniques. Each proposed project will be reviewed for triggering the requirements for incorporating LID, as practicable. When the requirements are triggered, LID opportunities will be explored. PDEs will be the lead on this effort and will provide data to the MS4 Coordinator for tracking. For encroachment and approach permit applications within Small MS4 areas, MDT will evaluate 100% of applications for appropriateness of incorporating LID techniques. Appropriate MS4-related information will be included in the permit issuance correspondence. PDEs will be the lead on this effort and will provide data to the MS4 Coordinator for tracking.
Opportunity for Improvement	-In 2022, MDT Environmental will investigate PESC training opportunities in coordination with MDT Hydraulics and Road Design personnel.	-MDT will Coordinate with MDT Hydraulics to formalize processes associated with runoff reduction requirements for post-storm water management controls and finalize the LID analysis form. -MDT will continue investigation of PESC Manual updates and training opportunities in 2022, in coordination with MDT Hydraulics and Road Design personnel.

SWMP Activity or Component Name	Ordinances and Storm Water Design Criteria BMP-PCRC-06	Vegetation Management Program BMP-PCRC-07
Minimum Control Measure Name (If Applicable)	Post-Construction Runoff in New Development and Redevelopment	Post-Construction Runoff in New Development and Redevelopment
General Permit Condition Item Number (If Applicable)	II.B.5	II.B.5
Brief Description of Planned SWMP Action Taken	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. MDT follows applicable federal, tribal, state and local laws and regulations within the Small MS4s.	Evaluate projects within Small MS4s that have open SWPPP permits for use of federal funds to conduct further revegetation that promotes closure of the SWPPP plans.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, PDEs, DEES	MDT, DEES, Botanist
Measurable Goal or Performance Standard Utilized	MDT will continue to follow federal, tribal, state and local laws and regulation and design standards. MDT will maintain and follow its design criteria for PESC and LID measures or seek formalized design exceptions for 100% of our projects within Small MS4s.	This BMP will be measured by comparing projects within the Small MS4s with open SWPPP permits. A determination will be made if improvement to the control of storm water run-off, and infiltration can be improved with further re-vegetation. The open permit projects and the projects that are closed will be tracked as well as the projects where funding was allocated within the Small MS4s.
Opportunity for Improvement	-MDT will Coordinate with MDT Hydraulics to formalize processes associated with runoff reduction requirements for post-storm water management controls and finalize the LID analysis form. -MDT will continue investigation of PESC Manual updates and training opportunities in 2022, in coordination with MDT Hydraulics and Road Design personnel.	-MDT will continue progress on this control measure.

SWMP Activity or Component Name	**Training** **BMP-PPGH-01.1**
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, SWPPP, FPPP, and SPCC Plans.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES and possible other Environmental Staff
Measurable Goal or Performance Standard Utilized	a) This BMP will be measured by ensuring that 100% of the DEES and MDT Maintenance staff performing SWPPP inspections in Small MS4s comply with the CGP and will have Certified SWPPP Administrator training/certification. Records will be kept of personnel who have taken the SWPPP Administrator training and passed the test to become an MDT Certified SWPPP Administrator. b) This BMP will be measured by ensuring that 100% of the maintenance staff performing site-specific FPPP inspections in MS4s have site specific FPPP training. Records will be kept of personnel who have received training on the site-specific FPPP and inspection procedures. c) The DEES will provide a presentation regarding storm water issues during at least one EPM meeting per year. The presentation will be a discussion of current storm water issues and an opportunity for questions regarding storm water issues related to design and construction activities. d) The DEES will provide a presentation during at least one MDT maintenance section man meeting per year. The presentation will include a discussion of current storm water control issues and an opportunity for questions regarding storm water control related to maintenance activities and facilities.
Opportunity for Improvement	MDT will continue progress on this control measure. In 2021, MDT finalized and implemented the formal FPPP Update and Training procedure and initiated updates to each of MDT's existing FPPPs and associated inspection checklists. The updated FPPPs will finalized in 2022, and training will be provided for MDT maintenance personnel on site-specific FPPP implementation.

SWMP Activity or Component Name	**Training** **BMP-PPGH-01.2**
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, SWPPP, FPPP, and SPCC Plans.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES, and possible other Environmental Staff
Measurable Goal or Performance Standard Utilized	a) ESB personnel, generally the Engineering Section Supervisor or the Field Services Engineer, will attend at least one quarterly DCE meeting per year and provide information related to MDT's overall storm water management program, including MS4 issues. b) ESB personnel, generally the Engineering Section Supervisor or the Field Services Engineer, will attend at least one quarterly Maintenance Chiefs meeting per year and provide information related to MDT's overall storm water management program, including MS4 issues. c) As discussed previously, several MDT facilities in MS4 areas fall under the SPCC Rule and have SPCC Plans. SPCC training, which includes information related to the MS4 Program, will be offered annually or according to SPCC requirements. d) As discussed previously, MDT is working to develop site-specific FPPPs for MDT facilities within MS4 areas that currently do not have FPPPs. Training is offered on each site specific FPPP upon completion of the plan. Additional training will be offered when the plan is amended or on an as needed basis, as necessary. Dates, name, and responsibility of staff members, as well as topics discussed, will be tracked on a spreadsheet as part of this measurable goal.
Opportunity for Improvement	-In lieu of attending quarterly Maintenance Chief meetings, ESB's Engineering Section Supervisor and/or Field Services Engineer will schedule routine meetings with MDT Maintenance to identify and prioritize structural BMP improvements at MDT facilities, and to continue evaluation of MDT's Maintenance Manuals and tracking systems for incorporation of MS4 operations and maintenance requirements. -In 2021, MDT finalized and implemented the formal FPPP Update and Training procedure and initiated updates to each of MDT's existing FPPPs and associated inspection checklists. The updated FPPPs will finalized in 2022, and training will be provided for MDT maintenance personnel on site-specific FPPP implementation.

SWMP Activity or Component Name	**Periodic SWPPP and SPCC Plan Inspections** **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	MDT will perform site inspections for MDT facilities within MS4s with FPPP and SPCC plans on the time basis documented in the SWMP.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES, Maintenance staff
Measurable Goal or Performance Standard Utilized	The DEES and MS4 Coordinator will analyze the FPPP inspection forms on a yearly basis to evaluate opportunities to improve and deal with identified deficiencies. In some cases, funds will have to be secured to improve the current infrastructure and might require several years before the BMP can be fully implemented.
Opportunity for Improvement	-MDT Environmental will provide facility-specific stormwater training to improve the FPPP inspection process. -MDT Environmental will coordinate discussions with maintenance personnel based on observations from the FPPP revisions and FPPP inspection information to identify processes and/or other facility improvements that will enhance overall environmental performance. -MDT Environmental will establish recurring meetings with Maintenance and continue to identify and prioritize structural improvements at MDT facilities.

SWMP Activity or Component Name	Road and Parking Sweeping BMP-PPGH-03	Road and Parking Area Maintenance BMP-PPGH-04
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	Implement a Street Sweeping Program that encompasses the streets and roadways, the maintenance yards and parking areas within its facilities. The street sweeping frequency depends on need and travel volumes. Sweepers also respond to certain types of spills that require clean-up work.	MDT will follow its Roadway / Roadside Maintenance Program to maintain roadways/roadsides for safety, to protect the environment, and to maintain a pleasing aesthetics in a functional manner.
Responsible Agency, Department, or Organization; and Person or Position	MDT, Maintenance staff	MDT, MS4 Coordinator, DEES, Maintenance Staff
Measurable Goal or Performance Standard Utilized	MDT's goal for the street sweeping program is to sweep 100% of the facilities and MDT maintained roads that are within our permitted Small MS4s a minimum of one (1) time per year.	MDT will evaluate current practices used during maintenance and operational activities to determine if modifications to these practices are warranted to minimize storm water pollutants reaching water ways. The evaluation of BMPs and procedures as well as suggestions will be documented to determine the best course of action to implement improvements as the measurable goal for this BMP. Cost, ease of implementation, and risk and benefit analysis will be taken into account to make recommendations to MDT management.
Opportunity for Improvement	MDT will continue to refine the Maintenance Management System (MMS) query to ensure updated MS4 boundary information is utilized in assessing this measurable goal.	-Although the statewide Maintenance Manual was reviewed to ensure that it was appropriate for the general BMPs, further refinement and formalization of the Permanent BMP O&M program implementation process will be evaluated for site-specific O&M requirements and application within each MS4 area. -In 2022, MDT Environmental will establish recurring meetings with Maintenance personnel and continue discussions regarding potential improvements in tracking permanent BMP maintenance actions.

SWMP Activity or Component Name	Winter Maintenance Program BMP-PPGH-05	Recycling Activities BMP-PPGH-06
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	MDT will evaluate the Winter Maintenance Program for feasible ways to transition to more environmentally friendly methods.	MDT has several recycling programs in place at the maintenance facilities within the Small MS4s. These programs will continue to be offered.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, and Maintenance Chiefs	MDT, MS4 Coordinator, DEES, Maintenance staff
Measurable Goal or Performance Standard Utilized	MDT will evaluate the current procedures described in the Winter Maintenance Program and if necessary, revise the existing manuals to reduce the potential of pollutants being discharged into the environment and consequently into waterways. The evaluation will be performed during the permit period, and revisions to the manuals will be posted on the MDT intranet. In addition, please see section 3.3.6.7 BMP on vehicle washing that describes MDT's current progress on constructing vehicle wash bays, which correlate with achieving the winter maintenance BMP.	MDT will continue to recycle and burn the used oil to heat select MDT facilities. MDT will also continue to recycle scrap and unused metal through the recycling companies throughout the permit period. MDT has created FPPPs that provide guidelines to help make the storage of the recycled materials storm water runoff safe. MDT will be inspecting the facilities on a monthly basis to ensure the recycled materials are being stored in a manner that protects storm water runoff.
Opportunity for Improvement	MDT will continue progress on this control measure.	MDT maintenance will administer a construction contract for Bozeman Hill sand removal to recycle and reuse traction sand that is recovered based on the demonstration of suitability from previous testing and studies of the material.

SWMP Activity or Component Name	**Vehicle Washing** **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	To evaluate the vehicle wash areas and procedures to minimize discharge of pollutants into surface water.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES, Maintenance Staff
Measurable Goal or Performance Standard Utilized	MDT will evaluate each maintenance facility for short term improvements (e.g., sweeping area at the end of the shift) and long-term improvement (e.g. a new wash bay). The short-term improvements will be implemented as soon as possible, while the long-term improvements will require additional planning and funding. In 2013, MDT completed one long term goal of constructing an updated wash bay at the Missoula MDT maintenance facility capable of appropriately disposing of wash water. Others completed include: Butte in 2015, Bozeman in 2016, and Great Falls in 2018. Additional short term and long-term improvements may be implemented and will be tracked for each facility as a measure of this goal during the permit period.
Opportunity for Improvement	-Short-term and long-term facility improvement recommendations are documented in an annual FPPP review form and shared with the EESS, FSE, and DEES. -MDT Environmental will establish recurring meetings with Maintenance and continue to identify and prioritize structural improvements at MDT facilities. -In 2022, MDT will determine whether geotechnical stability issues can be resolved for the proposed Billings Maintenance facility wash bay and if not, what other BMPs can be implemented to prevent discharge of wash water.

SWMP Activity or Component Name	Hazardous Waste Handling BMP-PPGH-08	Material Management BMP-PPGH-09
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	Limit the amount and type of hazardous materials on MDT sites, how and where they are stored, and who has access to them.	MDT will continue to stockpile and store materials, such as oils and deicing materials, in a manner to reduce the likelihood of accidental spills or release hazardous materials into the storm water system.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES, Maintenance staff	MDT, MS4 Coordinator, DEES, Hazmat section, and Maintenance staff
Measurable Goal or Performance Standard Utilized	MDT will continue to ensure that its staff is following the proper procedures when handling and storing hazardous materials and are well informed of the type and potential dangers associated with each chemical. SDSs are available at each facility within the MS4 areas and staff complies with the requirements of the SPCC Plans, including monthly site inspections. MDT will evaluate the plans as revised by federal and state regulations. Staff will complete monthly inspection forms. The MS4 Coordinator working with the Hazmat Supervisor, DEES, and FSE will determine if items in the inspection process need to be amended based on data provided in inspection forms. The measurable goal for this BMP will be to maintain MDT's status of conditionally exempt.	MDT will review existing storage procedures to ensure that they are current and effective. Revisions will be posted and employees will be made aware of the changes. This BMP will be measured by the number of spills that are reported within a permit period as required by the FPPP and SPCC Plans. The main goal is to eliminate spills and have zero reported spills during the permit period. If a spill is reported within a permit period, corrective actions will be taken to remedy the spill and preventive measures will be put into place to prevent the spills from reoccurring.
Opportunity for Improvement	-MDT will streamline the FPPP inspection process to improve the consistency of inspections and better define the responsibility for evaluating inspection results and resolving identified issues. -MDT will evaluate annual reports to determine training needs related to hazardous materials and SPCC and develop a training plan to address training topics.	-MDT will update FPPPs to ensure consistent spill response and reporting procedures are provided. -MDT will provide training for MDT maintenance personnel on site-specific FPPP implementation.

SWMP Activity or Component Name	Storm Drain System Cleaning and Maintenance BMP-PPGH-010	Develop SWPPPs and Updates to SWPPPs BMP-PPGH-11
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	Conduct routine system inspections, cleaning, and maintenance of MDT maintenance facilities, yards, and storm water infrastructure within the MDT right of way.	MDT has developed FPPPs for MDT facilities within the MS4s. MDT will update as necessary.
Responsible Agency, Department, or Organization; and Person or Position	MDT, MS4 Coordinator, DEES, Maintenance staff	MDT, MS4 Coordinator, DEES, Maintenance staff
Measurable Goal or Performance Standard Utilized	MDT will continue the current maintenance program and track the number of inspections, cleanings, and repairs conducted at each maintenance facility as well as continue maintenance conducted on MDT's right of way within the MS4 areas. MDT tracks hours and supplies in the Management System for each MS4 area. MDT will clean and provide maintenance to storm water structures as necessary. The need is determined from the inspections taking place as a regular part of the maintenance department employees' job duties. Other forms of notification can be from the public, city or county employees.	MDT will continue to evaluate and update the FPPPs as conditions change regarding design, construction, operation, or maintenance at the different facilities. The changes will be recorded in the Amendment Record Log included in each FPPP. In addition, MDT will continue to train its staff to better understand the implications of contaminating storm water and procedures to reduce the potential of contamination. FPPP inspections will be reviewed and analyzed by the MS4 Coordinator annually for the annual report. The forms, addendums, and training will be the measurable goal for this BMP.
Opportunity for Improvement	-MDT will streamline the FPPP inspection process to improve the consistency of inspections and better define the responsibility for evaluating inspection results and resolving identified issues. -MDT will explore opportunities to modify MMS to better track and flag roadside inspection and maintenance activities within MS4s.	-In 2021, MDT finalized and implemented the formal FPPP Update and Training procedure and initiated updates to each of MDT's existing FPPPs and associated inspection checklists. The updated FPPPs will finalized in 2022, and training will be provided for MDT maintenance personnel on site-specific FPPP implementation. -MDT will streamline the FPPP inspection process to improve the consistency of inspections and better define the responsibility for evaluating inspection results and resolving identified issues. -Short-term and long-term facility improvement recommendations are documented in an annual FPPP review form and shared with the EESS, FSE, and DEES. -MDT Environmental will establish recurring meetings with Maintenance and continue to identify and prioritize structural improvements at MDT facilities.