

SAVING TIME AND COST THROUGH AN UMBRELLA POLLUTION PREVENTION PLAN

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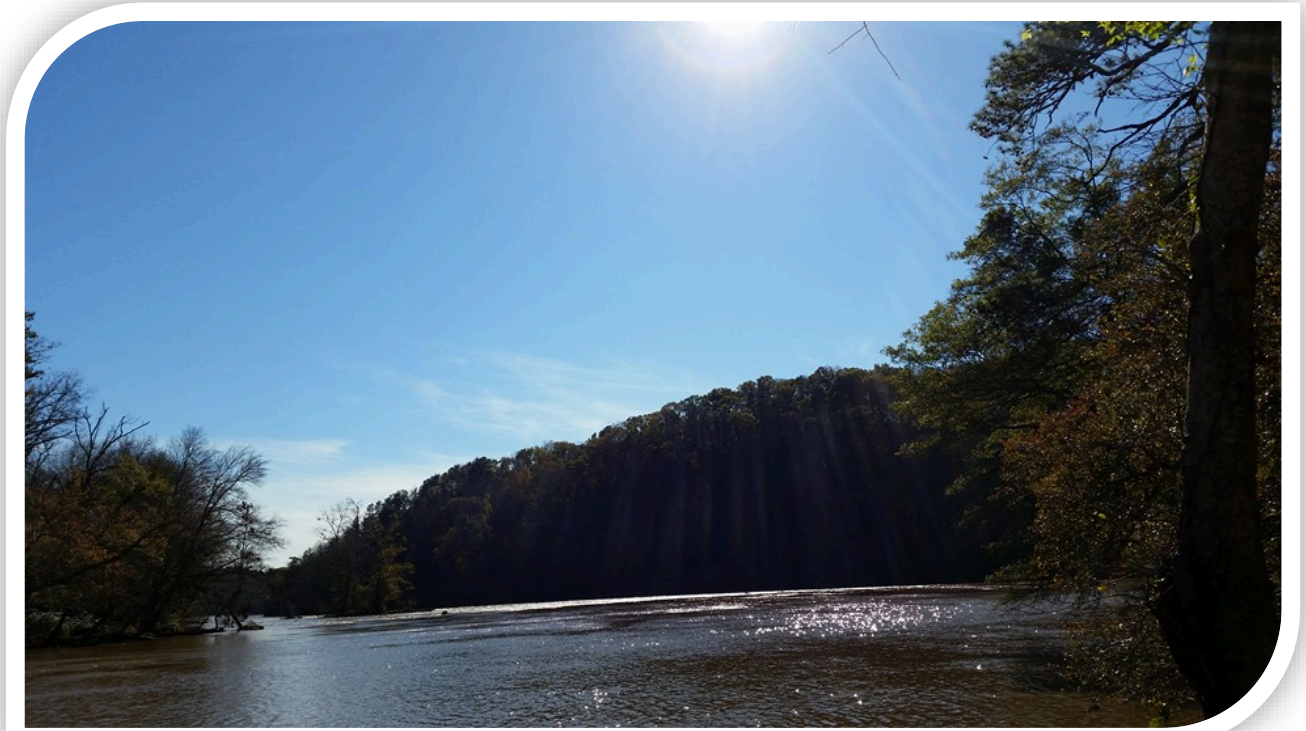
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Today's Presentation

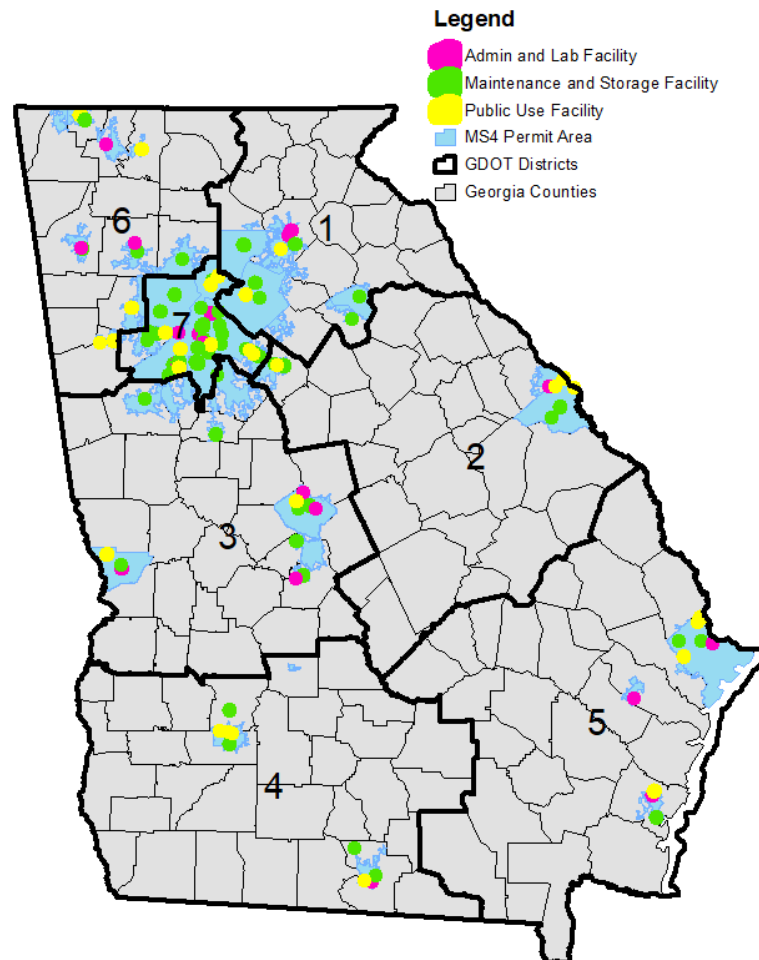
- Objective of Discussion
- Overview - Georgia DOT Facilities and MS4 Permit Coverage
- What is an F-SWPPP and why is it useful?
- Questions?

Objective

Developing Stormwater Pollution Prevention Plans for operators with multiple facilities and types can be time consuming. Reduce time, effort, and cost by creating an umbrella document providing a comprehensive overview of all facility types and pollution prevention control measures to guide and significantly reduce the effort to prepare site-specific SWPPPs.



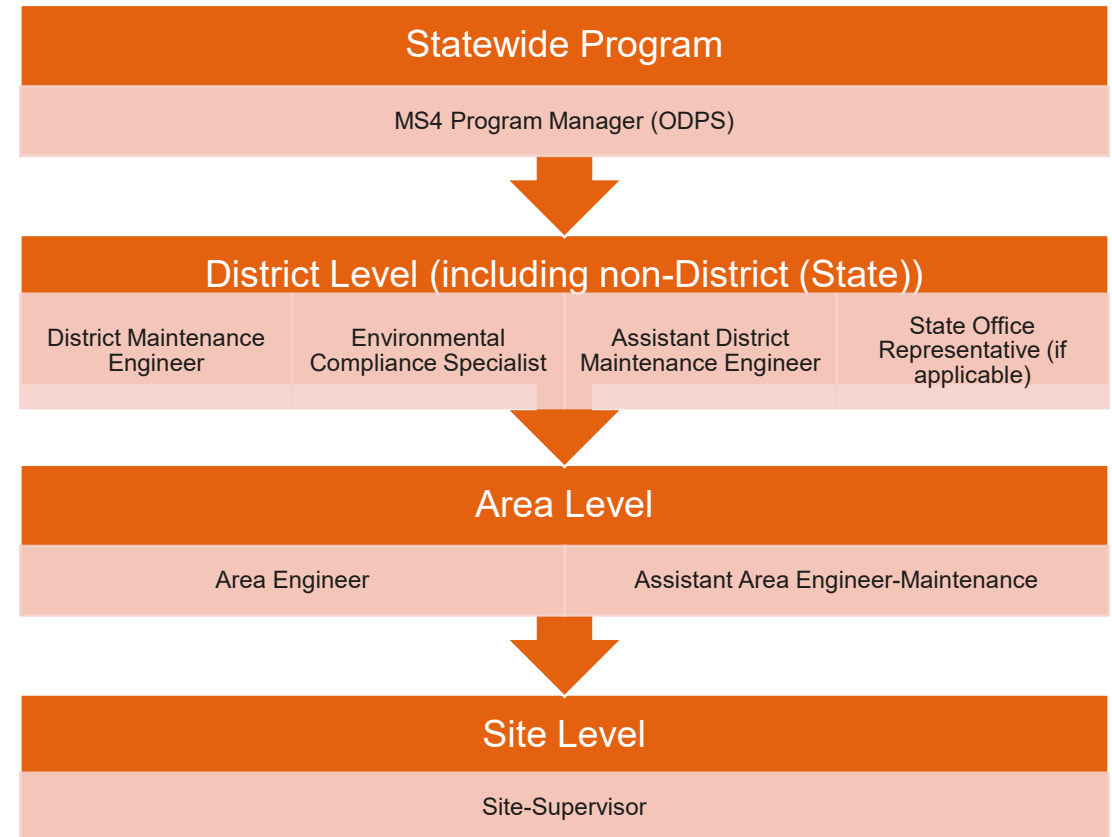
Georgia Department of Transportation



- Georgia is Divided into 159 Counties
- GDOT Operations are Divided into 7 Districts
- Each District is Divided into 3 to 5 Areas
- Generally, a County is a unique unit within an Area
- GDOT owns 174 facilities within the MS4 counties (multiple facility types may fall under one address)
- 4 overarching facility types
 - Administrative and Laboratory
 - Maintenance and Storage
 - Public Use
 - Linear (covered in a different manual)
 - Example: Roadways, weigh stations

Georgia Department of Transportation

- GDOT owns over 124,500 miles of roadways
- 3,096 miles are within MS4 Permitted Areas
- 49 different counties contain MS4 Permitted Areas
- Districts operate separately
- MS4 Program is centrally managed at the General Office



Each District operates uniquely, but the MS4 Program is centrally managed

Administrative and Laboratory



- **District Offices**
- **Area Offices**
- **Laboratories**
- **Bridge Inspection Offices**
- **Construction Offices**
- **Other management, supervisory,
and administrative facilities**
- **Stand-alone facilities**

Maintenance and Storage

Maintenance Shops

Maintenance Headquarters

Fueling Stations

**Salt Barns and Brine
Storage**

Exposed Storage Yards

**Other Maintenance
and Storage Facilities**



Public Use



Welcome Centers


Rest Areas

Park & Ride Lots

GDOT MS4 Permit

- GDOT is under a NPDES Phase II MS4 Permit
 - First permit issued in 2012 / Renewed in 2017
- Permit and Minimum Control Measures applied statewide (within MS4 Permitted Areas)
- Each District is operated in a unique and different way, but each must comply with the Permit
- Under the Pollution Prevention/Good Housekeeping for Municipal-Type Operations MCM a operation and maintenance program must be developed.

General NPDES
Stormwater Permit
No. GAR041000


GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

AUTHORIZATION TO DISCHARGE UNDER THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM


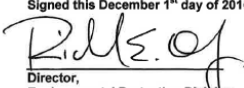
STORMWATER DISCHARGES ASSOCIATED WITH
MUNICIPAL SEPARATE STORM SEWER SYSTEM

GEORGIA DEPARTMENT OF TRANSPORTATION

In compliance with the provisions of the Georgia Water Quality Control Act (Georgia Laws 1964, p. 416, as amended), hereinafter called the "State Act," the Federal Clean Water Act, as amended (33 U.S.C. 1251 et seq.), hereinafter called the "Clean Water Act," and the Rules and Regulations promulgated pursuant to each of these Acts, all new and existing stormwater point sources associated with the Georgia Department of Transportation municipal separate storm sewer system, upon submittal of a Georgia Notice of Intent, are authorized to discharge stormwater to the waters of the State of Georgia in accordance with the limitations, monitoring requirements and other conditions set forth in Parts 1 through 6 and the Appendices hereof.

This permit shall become effective on January 3, 2017.

This permit and the authorization to discharge shall expire at midnight, January 2, 2022.


Signed this December 1st day of 2016.

Director,
Environmental Protection Division

GDOT MS4 Permit

- The Pollution Prevention & Good Housekeeping Program must include:
 - Develop Procedures for Inspection of Facilities
 - Develop Procedures for Routine Maintenance Activities
 - Perform Regulatory Inspections
 - Inspect 20% of Facilities Each Year
 - Inspect 100% of Facilities During Permit Periods
- A Manual was Developed to Include →

Salt and de-icing
material
application and
storage

Equipment/Vehicle
washing

Storage and
disposal of
chemicals and
waste materials

Road surface
maintenance

Storm sewer
system repair

Landscaping

Herbicide
spraying/fertilizer
application and
material storage

Bridge repair and
maintenance

Right-of-way
embankment
stabilization

Vegetation control,
cutting, removal,
and disposal of the
cuttings

Vehicle/equipment
maintenance and
repair

Facilities Stormwater Pollution Prevention Plan (F-SWPPP)



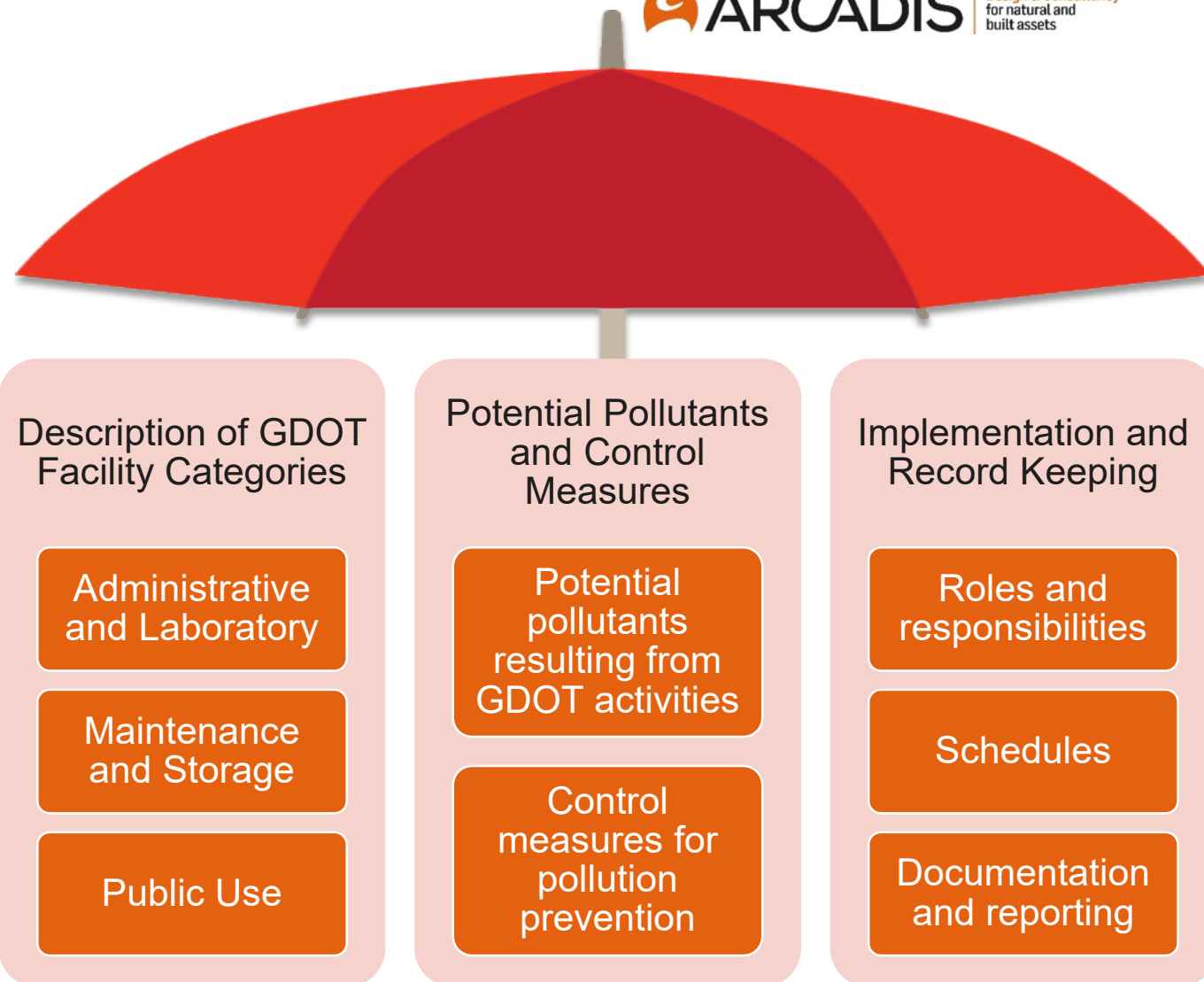
Imagine the result



**Facilities Stormwater
Pollution Prevention Plan**

Under Revision as of April 2019

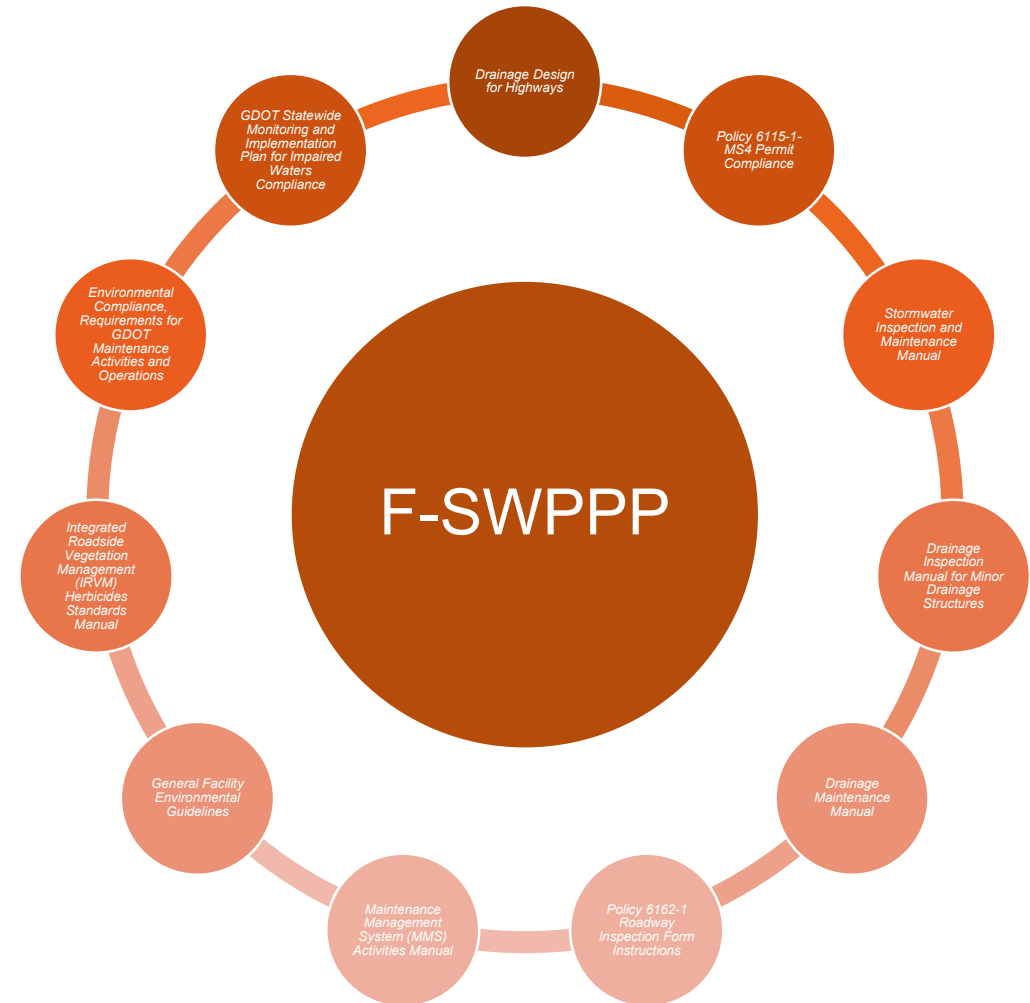
This Plan complies with NPDES Stormwater (MS4)
Permit Number GAR041000
Current Permit: January 3, 2017-January 2, 2022
Original Permit: January 3, 2012-January 2, 2017



F-SWPPP is an “Umbrella” document to cover all facility types, activities, potential pollutants, and control measures

Policies and Procedures

The F-SWPPP provides a central location for identifying and referencing the Department's policies regarding inspection, maintenance, and good housekeeping.



Pertinent GDOT policies and procedures are referenced in the F-SWPPP

Potential Pollutant Sources

GDOT Activities

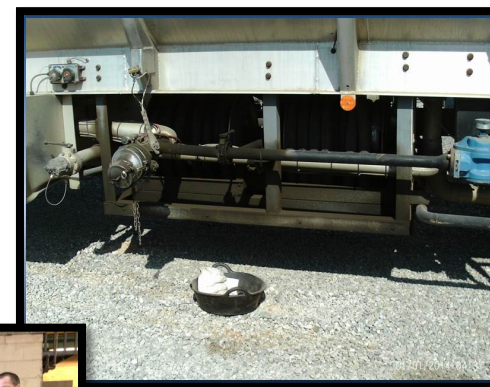
- Vehicle & equipment repair
- Outdoor vehicle & equipment parking
- Outdoor material handling & storage
- Fueling
- Vehicle Washing
- Salt & brine storage
- Waste disposal
- Right-of-way maintenance
- Materials transport
- Construction & maintenance
- Mowing/Landscaping
- Sanitary sewage collection, treatment & disposal

Potential Pollutants

- Oil, gas, lubricants
- Liquid asphalt
- Coolant
- Cleaning solvents
- Detergents
- Salt & brine solution
- Soil, sand & sediment/grit
- Litter & solid waste
- Chemicals
- Pesticides, herbicides & fertilizers
- Asbestos fibers
- Metals
- Bacteria
- Nutrients

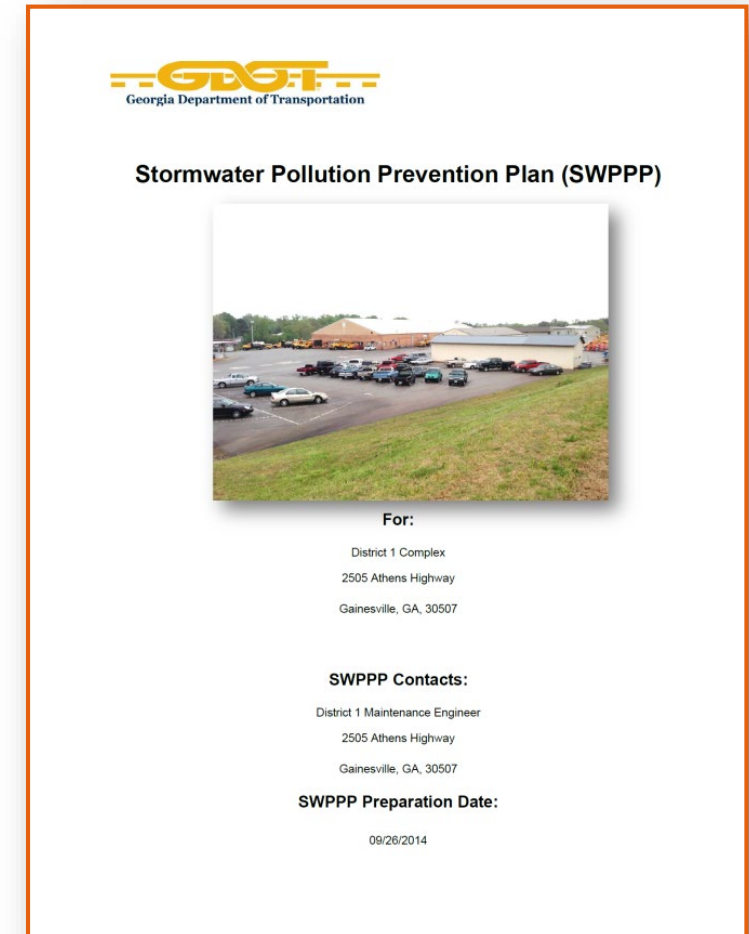
Pollution Control Measures

- Good Housekeeping
- Minimizing Exposure
- Spill Control
- Policies and Procedures
- Runoff Management
- Training



Site-Specific SWPPPs

- Provides a Site Specific Reference for Local Staff
- SWPPPs are Prepared for Each Facility
- Properties with Multiple Facilities and Types may be into a Common SWPPP for the Property
- SWPPPs are Reviewed Annually in Conjunction with Site Inspections
- SWPPPs are Updated During Each Permit Cycle in Conjunction with a Regulatory Inspection



SWPPPs are much smaller and easier to manage then the full F-SWPPP

Site-Specific SWPPP

- Many sections of the SWPPP do not change, making it quick to update
- Key sections that change:
 - Facility Description
 - Stormwater Pollution Prevention Team
 - References Positions at Facility
 - Site Drainage Characteristics
 - Major Site Activities
 - Inspection Report Appendix

Typical site-specific SWPPPs are only 14 pages before appendices, as opposed to 40 or more.

1.	Introduction
2.	Facility Description
2.1	Facilities and Facility Types
2.2	Contact Information and Responsible Parties
2.3	Stormwater Pollution Prevention Team
3.	Site Drainage
4.	Major Site Activities with Potential for Stormwater Impacts
5.	Stormwater Control Measures
6.	Facility Inspections and Corrective Actions
7.	SWPPP Modifications
8.	Training
9.	Record Keeping and Reporting
9.1	Record Keeping
9.2	Reporting
10.	References
Tables	
1	Facilities and Facility Types
2	Stormwater Pollution Prevention Team
Figures	
1	Site Location Map
2	Site Map
Appendices	
	•Completed Inspection Reports
	•SWPPP Modifications
	•Additional Documentation

Site-Specific SWPPP

F-SWPPP Reference

**Section of F-SWPPP changes
with different facility types**

5. Stormwater Control Measures

Control measures to reduce the potential for stormwater pollution at Maintenance and Storage facilities are summarized in **section 3.2.9 of the F-SWPPP**. The control measures in the F-SWPPP are grouped according to typically conducted facility activity and categorized to indicate the variety of structural and non-structural measures that should be considered for implementation.

**F-SWPPP sections
are referenced
through-out the
document instead of
having to explain
each activity/control
measure/potential
pollutant in detail.**

**Same language
in all SWPPPs**

The facility should be prepared and monitored for spills from vehicles, equipment, and materials stored onsite. In the event of a spill, immediate action should be taken to contain the spill at the source, to protect inlets and the drainage network, and to promptly pursue clean-up and proper disposal. Should a spill leave the site or discharge into a stormwater structure, the Illicit Discharge Detection and Elimination Plan shall be followed to immediately contact the appropriate personnel.

Site-Specific SWPPP

4. Major Site Activities with Potential for Stormwater Impacts

The primary function of this facility is the personnel, vehicle/equipment, and material staging area for routine highway and right-of-way maintenance activities. The small office is for minor administrative functions and records management. The connected shop provides a climate-controlled crew assembly area, interior storage of some materials, and an area for minor equipment maintenance. The site also has other buildings and/or sheds for material and equipment storage.

Typical exterior storage occurs for various aggregates for asphalt operations, materials required for basic highway maintenance, equipment components/accessories, surplus soil, scrap and waste materials, and other items. Potential pollutants may include deteriorating coatings and corrosion from steel and other metal, fluid leakage, sediment, and other sources.

Vehicles and equipment parked outdoors may leak fluids and drop residual materials which have the potential to be transported by stormwater runoff. During winter weather events, salt and sand operations have the potential to lead to stormwater pollution.

The Salt Barn provides covered storage for bulk stockpiles of salt and has curtains on the ends that are closed to prevent contact with precipitation. Improper stockpile management, material delivery and transfer and material loading onto vehicles for application could result in stormwater pollution.

The sanitary sewage from this facility is discharged to the municipal sanitary sewer system. Without proper maintenance, leaks or overflows from the sanitary sewer lines may contribute bacteria and nutrients to waters of the State.

Section 3.2. of the F-SWPPP presents detailed information on the site activities and stormwater pollutant sources at the Maintenance and Storage facilities.

General language pulled from F-SWPPP. Paragraphs are simply copied based on facility activities.

F-SWPPP sections are referenced through-out document instead of having to explain each activity/control measure/potential pollutant in detail.

Section of F-SWPPP changes with different facility types

Benefits of having an Umbrella Document

- Describes All Potential Pollutants, Control Measures, and Activities
- Changes in the F-SWPPP do not Create the Need to Update Site Specific SWPPPs
 - F-SWPPP is available to all Department Personnel via GDOT Intranet
- Site-Specific SWPPPs are Easier and Straight Forward for Site Personnel to Understand, Implement, and Update
- Provides Consistency between Facilities, Areas, and Districts
- Site-Specific SWPPPs can be Developed or Updated Quickly saving time and money

QUESTIONS?

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