

# Maine Turnpike Authority

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## VIA E-MAIL

September 15, 2016

Mr. David Ladd  
Municipal and Industrial Stormwater Coordinator  
Bureau of Land and Water Quality  
Maine Department of Environmental Protection  
17 State House Station  
Augusta, Maine 04333-0017

SUBJECT: Maine Turnpike Authority  
Stormwater Program Management Plan  
Maine DEP Permit # MER043001  
Annual Report for Permit Year 3 (July 2015 through June 2016)

Dear David:

On behalf of Maine Turnpike Authority (MTA), I am pleased to submit this Annual Report for Permit Year 3 (PY3, defined as July 2015 to June 2016). This report is intended to satisfy the requirements in **Part IV(J)** of the Maine Pollutant Discharge Elimination System (MPDES) General Permit for Stormwater Discharges from Maine Department of Transportation (MaineDOT) and MTA Municipal Separate Storm Sewer Systems (MS4s).

The Annual Report describes the status of MTA's program of Best Management Practices (BMPs) and Measurable Goals (MGs) for each of the six Minimum Control Measures (MCMs) presented in MTA's Stormwater Program Management Plan (SPMP) (dated December 2, 2013) for PY3.

### BACKGROUND

MTA's SPMP was developed in accordance with **Part IV(A)** of the MPDES MS4 General Permit for the purpose of establishing, implementing and enforcing a stormwater management program to reduce the discharge of pollutants from MTA's roadways, drainage areas and facilities located within Urbanized Areas (UAs). For each MCM established in the SPMP, measurable goals have been established to evaluate the effectiveness of the designated BMPs. These goals have been assigned an implementation schedule and/or milestones for implementation of applicable BMPs.

The SPMP has not been modified or updated since its submittal to the Maine Department of Environmental Protection (DEP); therefore, a copy of the SPMP is not included with this report. Correspondence regarding MTA's PY2 Annual Report was received from Maine DEP on January 27, 2016, and MTA's written response was submitted to Maine DEP on March 25, 2016.



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In accordance with *Part IV(J)(1)* of the MPDES MS4 General Permit, this Annual Report provides a summary of activities that demonstrate MTA's compliance status with respect to the MS4 permit conditions and progress toward achievement of the goals identified for each MCM in the subsections below. The BMPs identified in the SPMP are appropriate to meet the goals identified for each MCM. No monitoring data or other information was required by the MS4 permit in PY3. Anticipated activities in PY4 include, but are not limited to, additional stormwater infrastructure mapping efforts (BMP 3.1) and a comprehensive review and revisions to MTA's Construction Project Environmental Compliance (CPEC) Program. No changes have been made to measurable goals identified in the SPMP. The subsections below describe the activities, progress, and accomplishments for each of the MCMs.

MTA enforces certain MCMs through construction contract specifications and has developed the CPEC Program to ensure compliance with MS4 MGs and other stormwater requirements. The CPEC Program is summarized in **MCMs 4, 5 and 6**, but also includes **MCM 1** requirements (e.g., incorporating Stormwater Awareness and Targeted BMP Adoption Plans into project-specific documents for MTA contractors and employees).

### **MCM 1 - PUBLIC EDUCATION AND OUTREACH ON STORMWATER IMPACTS**

**Goals:**

1. *To raise awareness that polluted stormwater runoff is one of the most significant sources of water quality problems for Maine's waters;*
2. *To motivate staff and contractors to use Best Management Practices (BMPs) which reduce polluted stormwater runoff; and*
3. *To reduce polluted stormwater runoff through increased awareness and utilization of BMPs.*

#### **BMP 1.1 CONTINUE RAISING AWARENESS OF STORMWATER ISSUES AMONGST EMPLOYEES AND CONTRACTORS**

MTA's annual stormwater training program was conducted for maintenance personnel and engineering inspectors to address pollution reduction in stormwater runoff. The stormwater training program, which is combined with Spill Prevention, Control and Countermeasures (SPCC) and Erosion and Sedimentation Control (ESC) practices training, was performed in May and June 2016 by regulatory specialists from GZA GeoEnvironmental, Inc. and MTA.

MTA SPCC/Stormwater/ESC training sessions held in 2016 emphasized the following:

- MS4 2013 changes (e.g., additional Urbanized Areas [UA], etc.);
- Review of MTA's MS4 Urban Impaired Streams (UIS) strategy, which identified Goosefare Brook and Hart Brook as MTA's two designated highest-priority watersheds with consideration of other UIS watersheds (e.g., Long Creek, Capisic Brook, Red Brook, etc.) within the MTA system;
- MTA's Mobile SPCC Plan, which includes procedures for refueling of mobile equipment, such as mowers, loaders and other heavy equipment (i.e., avoid and minimize refueling within UA and UIS watersheds);
- Review of MTA's CPEC program, including GIS-based post-construction Operations and Maintenance (O&M) Plans and updated BMP inspection forms for maintenance activities;
- Requirements within the Long Creek watershed and other areas where watershed management plans (WMPs) are imminent;
- Quarterly and annual reporting associated with MTA's Annual Memorandum of Agreement (MOA) Report, including routine O&M, recertification, etc.; and

- Maintenance (e.g., sweeping, catch basin cleanouts, outfall inspections, etc.) as per MTA's MS4 UIS Strategy, including updates to the Catch Basin Cleaning and Illicit Discharge Detection and Elimination (IDDE) tracking forms.

MTA's Stormwater Awareness Plan was summarized during the employee training sessions to ensure that all MTA employees are aware of the goals of this plan. A written summary of the program was provided to the MTA Board as part of the June 2016 meeting packet. Additionally, MTA's CPEC Program requires that contractors conducting work on projects located within UA receive, review, and sign a copy of this plan. Process and impact indicators are summarized below.

Process Indicators for PY3 are as follows:

- Number employee training sessions: **6**
  - One session was held at each of the following MTA maintenance facilities: York, Kennebunk, Crosby/South Portland, Gray, and Gardiner; and
  - One make-up session was held at MTA headquarters (HQ).
- Number of MTA employees trained: **86**

Impact Indicators for PY3 are as follows:

- Average test score for the SPCC/ESC/Stormwater Training Session: **91%** (PY1 = 94%)
- Percentage of attendees able to identify the goals of the Stormwater Awareness and BMP Adoption Plans: **95%** (PY1 = 96%)
- Percentage of attendees able to identify and differentiate between a structural and nonstructural BMP: **74%** (PY1 = 78%)
- Percentage of attendees able to identify sources of stormwater pollution: **97%** (PY1 = 99%)

The impact indicators provide some insight into the progress and effectiveness of the annual stormwater training sessions. In general, the impact indicators in PY3 provide data to demonstrate that MTA employees remain knowledgeable in stormwater and ESC practices, as evidenced by the consistency in the average test scores from PY1 to PY3.

#### BMP 1.2 CONTINUE ENCOURAGING EMPLOYEES AND CONTRACTORS TO UTILIZE BMPs THAT MINIMIZE STORMWATER POLLUTION

In PY3, MTA maintained and implemented the existing BMP Adoption Plan that identifies target BMPs to be utilized by employees and contractors that minimize stormwater pollution. As part of the UIS strategy associated with this MCM, the BMP Adoption Plan places emphasis on utilizing target BMPs within MTA's two designated highest priority watersheds.

MTA's Targeted BMP Adoption Plan was reviewed during the employee training sessions described in **BMP 1.1** to ensure that all MTA employees are aware of the goals of this plan. Additionally, MTA's CPEC Program requires that contractors conducting work on projects located within UA receive, review, and sign a copy of this plan.

Process Indicators for PY3 are discussed under **BMP 1.1**.

Impact Indicators for PY3 are as follows:

- Percentage of attendees who demonstrated applied knowledge of BMP-specific information: **82%** (PY1 = 74%)

Analysis of MTA employee knowledge of best practices was performed to assess the impact indicators in PY5. Test scores indicate that MTA employees are knowledgeable in applying their training in the field and that the annual stormwater training is effective.

### BMP 1.3 CONTINUATION OF EXISTING EDUCATION AND OUTREACH EFFORTS

MTA has continued the existing education and outreach efforts established during the previous MS4 permit cycle. MTA requires all contractors to submit training certificates for the delegated On-Site Responsible Party (OSRP) on MTA contracted projects located within UAs to ensure they are adequately trained and knowledgeable in ESC from Maine DEP's Non-Point Source (NPS) Training Program or an equivalent program.

Although no contractors were formally trained in the CPEC program in PY3, seven (7) construction projects were ongoing and an additional three (3) construction projects were initiated in the urbanized area and those contractors were required to review and sign copies of MTA's Stormwater Awareness Plan and Targeted BMP Adoption Plan.

## **MCM 2 – PUBLIC INVOLVEMENT AND PARTICIPATION**

### ***Goals:***

*Involve MTA's community including various departments or facilities, and when applicable involve regulated small MS4 communities, in both the planning and implementation process of improving water quality and reducing quantity via the stormwater program.*

### BMP 2.1 PUBLIC NOTICE REQUIREMENT

MTA maintains a written public notice policy and complies with the Maine Freedom of Access Act. In PY3, MTA did not host any public meetings involving MS4 stakeholders in the implementation of this General Permit.

### BMP 2.2 COORDINATE WITH REGULATED COMMUNITIES

In PY3, the MTA maintained close communication with MS4 communities and their respective Stormwater Coordinators, primarily through participation in the Greater Portland Interlocal Stormwater Working Group (ISWG). Community coordination is also a component of MTA's CPEC program, which includes project development phase communication with host municipalities that addresses planned construction and maintenance activities. Additionally, MTA remains closely involved with the evolving management requirements of UIS watersheds both within and outside of UA. MTA communicates periodically, through participation in ISWG meetings and involvement as a stakeholder, with host municipalities regarding watershed management planning efforts within MTA's ROW. MTA participated in the following efforts in fulfillment of **MCM 2** in PY3:

- MTA personnel (or their designees) have attended and participated in multiple public meetings, seminars, and conferences related to stormwater, including six ISWG meetings. MTA personnel also monitor agendas and minutes from the York and Bangor Area stormwater groups to facilitate collaboration among MS4 communities;
- MTA's Environmental Services Coordinator is a Governing Board member of the Long Creek Watershed Management District;
- Displayed "Think Blue" Ducky stickers at MTA facilities in highly visible areas such as toll booths and service plazas;
- Shared GIS mapping data with the City of Auburn at their request to assist them with identifying interconnected infrastructure; and

- Attended meetings and participated in watershed-based planning and implementation projects with regulated communities including Goosefare Brook Watershed-based Management Plan (WMP) in Saco, Thatcher Brook WMP implementation in Biddeford, Hart Brook WMP implementation in Lewiston, and Phillips Brook WMP project in Scarborough.

### **MCM 3 – ILLICIT DISCHARGE DETECTION AND ELIMINATION**

#### **Goals:**

*Develop, implement and enforce a program to detect and eliminate illicit discharges and non-stormwater discharges in MTA's stormwater systems.*

#### **BMP 3.1 GROUND VERIFY WATERSHED BASED MS4 INFRASTRUCTURE MAP**

The UA within MTA's ROW was mapped during the previous MS4 permit cycle using 2000 Census Bureau data. In PY1, MTA completed the process of identifying the additional UA that requires stormwater infrastructure mapping as a result of the 2010 Census Bureau data.

PY2 ground verification of infrastructure in the two highest priority watersheds identified a data gap in MTA's infrastructure mapping at bridge structures associated with intersecting local roads (i.e., over/underpasses). The additional infrastructure found within the highest priority watersheds in PY3 included catch basins and associated inlet/outlet pipes, bridge drainage scuppers, and runoff points at railroad and local road over/underpasses within the MTA corridor. Updates to MTA's geodatabase included the addition of one catch basin and associated inlet and outlet pipes located within the Goosefare Brook watershed at the railroad track overpass on the I-195 Spur. Within the Hart Brook watershed, MTA added three (3) bridge drainage scuppers located at the River and Goddard Road underpasses, four (4) catch basins and associated piping at the Goddard Road overpass and multiple runoff points at the River Road, Goddard Road, Hart Brook crossing and Ferry Road overpasses. During PY4 MTA plans to ground verify drainage at the remaining local road over/underpasses within MTA's UA.

MTA maintains its stormwater infrastructure mapping data in an ArcGIS Server geodatabase that is not publicly available on the MTA website. A copy of the geodatabase and/or pdf maps can be made available to Maine DEP or other interested parties upon request. MTA typically updates these maps annually to reflect modifications in infrastructure (e.g., infrastructure removal/installation, more accurate mapping data, etc.). Maps and tracking forms are provided to each maintenance facility every spring in order to facilitate dry weather inspections.

#### **BMP 3.2 CONDUCT DRY WEATHER INSPECTIONS OF OUTFALLS AND IMPLEMENT A COORDINATED INSPECTION PROGRAM**

The MTA conducted dry weather inspections at approximately 600 sites in PY3 as part of MTA's prioritized dry weather inspection program. The dry weather inspection program includes inspection and cleanout, as needed, of Catch Basins (CBs), Outfalls<sup>1</sup> (OFs), and Discharge Points<sup>2</sup> (DPs) within the entire UA and UIS watersheds. Priority is given to Long Creek, Goosefare Brook, and Hart Brook watersheds; however, maintenance crews also inspect and cleanout, as needed, the remaining stormwater infrastructure in the UA every year in an effort to be proactive. MTA continues to use tracking forms to capture dry weather inspection and catch basin cleanout information, which are summarized in **BMP 6.4** and available to Maine DEP upon request.

In PY1, MTA reached out to local MS4 Stormwater Coordinators in MTA's two highest priority watersheds to develop a coordinated dry weather inspection program. An MTA representative met with

<sup>1</sup> MTA's IDDE maps identify catch basin outlets as outfalls.

<sup>2</sup> Discharge points are areas where runoff from MTA's ROW may either enter a receiving waterbody or another permitted MS4 system (i.e., municipal or MaineDOT stormwater conveyance).

each municipality's MS4 Coordinator to review outfall inspection techniques as well as the IDDE maps and tracking forms for MTA's ROW in the watershed. Coordinated inspections of select outfalls in Goosefare Brook in Saco were conducted on December 7, 2015, with Joe Laverriere, City of Saco Engineer, and Joe Cooper, City of Saco GIS/Engineering Technician. During the coordinated effort with the City of Saco in the Goosefare Brook watershed, a total of three (3) sites were visited. One (1) catch basin, one (1) outfall and three (3) discharge points were inspected. Coordinated inspections of select outfalls in Hart Brook in Lewiston were conducted on December 8, 2015, with Justin Early, City of Lewiston Project Engineer. During the coordinated effort with the City of Lewiston in the Hart Brook watershed, a total of three (3) sites were visited. Four (4) catch basins, one (1) outfall and five (5) discharge points were inspected.

### BMP 3.3 IMPLEMENT OPEN DITCH ILLICIT DISCHARGE PROGRAM

The MTA IDDE program has been updated and implemented to include MTA's open ditch systems. Open ditch IDDE efforts have been completed within MTA's two highest priority UIS watersheds and within all of MTA's UA.

Ditches that discharge directly to surface water have been categorized as DPs and are included on the same tracking forms used to capture dry weather inspection and catch basin cleanout information, which are summarized under **BMP 6.4**, below, and available to Maine DEP upon request. MTA has categorized connections from CB drain pipes into its ditch system as OFs and evaluated each of these conveyances for the presence of unauthorized discharges via dry weather inspection. No flows from pipes or other conveyances, other than stormwater and authorized non-stormwater conveyances have been observed to date.

### BMP 3.4 CONTINUE TO IMPLEMENT ILLICIT DISCHARGE DETECTION AND ELIMINATION PROCEDURE POLICY

MTA has an established procedure and has developed a form for evaluating and documenting suspected illicit discharges. The catch basin cleanout and IDDE tracking form directs the inspector to complete the Suspected Illicit Discharge Form and notify MTA's Environmental Services Coordinator who then performs an investigation of each suspected illicit discharge in accordance with MTA's IDDE SOP. To date, no illicit discharges have been identified during MTA's annual dry weather inspections.

### BMP 3.5 IDENTIFY NON-STORMWATER DISCHARGES

No illicit discharges or non-stormwater discharges were identified. However, nine spills within the UA occurred in PY3, which were reported to Maine DEP and cleaned up immediately without impact to stormwater infrastructure or waters of the State.

- July 2, 2015: A truck rollover accident at the Exit 75 northbound ramp in Auburn resulted in the release of approximately 10 gallons of diesel fuel to the roadway, road shoulder, and ponded water within the roadside swale. Absorbent pads were placed in the ponded water within the swale and on the roadway surface. Under the direction of Maine DEP's spill response personnel, approximately 175 gallons of water with diesel were pumped from the swale. The recovered water and absorbent materials were disposed of by the cleanup contractor.
- August 24, 2015: A leaking tractor resulted in the release of approximately 1 gallon of hydraulic oil to the pavement in the Exit 53 employee parking lot in Falmouth. The impacted sorbent material was promptly cleaned up and disposed of by Maine Turnpike Authority highway maintenance personnel, and the tractor was removed and repaired.
- September 10, 2015: A leaking motor vehicle fuel tank resulted in the release of approximately one quart of gasoline to the pavement at the intersection of Maine Turnpike Exit 32 and Route 111 in Biddeford. The impacted sand on the edge of the pavement was promptly cleaned up and disposed of by Maine Turnpike Authority highway maintenance personnel.

- October 22, 2015: A truck struck metal debris in Portland resulting in the discharge of approximately 5 gallons of engine oil and 150 gallons of diesel fuel to the pavement (MM 49 through MM 51 southbound in Portland) and road shoulder (MM 51 southbound). The spilled oil and impacted soil were promptly cleaned up and disposed of under the direction of Maine DEP's spill response personnel.
- January 16, 2016: A motor vehicle accident at MM 79.8 southbound center median in Lewiston resulted in the discharge of approximately 90 gallons of diesel fuel. The spilled fuel and impacted soil were promptly cleaned up and disposed of under the direction of the Maine DEP's spill response personnel.
- January 19, 2016: A motor vehicle accident at MM 41.5 southbound shoulder in Scarborough resulted in the discharge of approximately 150 gallons of diesel fuel. Sorbent booms were deployed in the ditch line. The spilled fluids in the ditch line and impacted soil were promptly cleaned up and disposed of under the direction of the Maine DEP's spill response personnel.
- February 3, 2016: A motor vehicle accident at MM 32 southbound center median in Saco resulted in the discharge of approximately 75 gallons of diesel fuel. The spilled fuel and impacted soil were promptly cleaned up and disposed of under the direction of the Maine DEP's spill response personnel.
- February 3, 2016: A motor vehicle accident involving one tractor trailer truck and four automobiles at MM 34 southbound travel lane in Saco resulted in the discharge of approximately 5-10 gallons of engine coolant/antifreeze to the pavement. The spilled fluids and absorbent materials were promptly cleaned up and disposed of under the direction of the Maine DEP's spill response personnel.
- May 26, 2016: A motor vehicle collided with an arrow board at MM 80.2 southbound in Lewiston resulted in the discharge of approximately 5 gallons of engine coolant (ethylene glycol) to the pavement. The spilled fluids and absorbent material were promptly cleaned up and disposed of by MTA highway maintenance personnel.

#### **MCM 4 – CONSTRUCTION SITE STORMWATER RUNOFF CONTROL**

***Goals:***

*Continue to implement and enforce MTA's program to reduce pollutants in stormwater runoff from construction activities that result in a land disturbance of greater than or equal to one acre.*

#### **BMP 4.1 CONTINUE TO IMPLEMENT CONSTRUCTION PROJECT ENVIRONMENTAL COMPLIANCE (CPEC) PROGRAM**

The Construction Project Environmental Compliance (CPEC) Program is the primary means by which the MTA addresses stormwater management issues, including runoff from construction activities conducted by MTA and/or its contractors. The CPEC Program includes MS4 elements to control stormwater runoff from construction sites including but not limited to:

- Including language in the specifications and ESC Plan to notify the contractor that they are in an MS4 project area;
- Requiring contractors to provide an OSRP for each project and submit training certificates for the delegated OSRP for projects located within MTA's UA; and
- Identifying and inspecting structural and non-structural BMPs designed/constructed in an MS4 project area.

In PY3, MTA maintained these requirements, as well as those construction-related requirements associated with Chapter 500 and the MOA. These measures included the requirement to apply MaineDOT's BMP/ESC Manual on all projects regardless of size, thus often exceeding the requirements

of the permit.

The MTA submits a separate Annual Progress Report to the Maine DEP to satisfy the requirements in the Stormwater Memorandum of Agreement (MOA)<sup>3</sup>, dated November 14, 2007, as adopted by the Maine DEP, MaineDOT and MTA. The Annual MOA Report, most recently submitted to Maine DEP in September 2016, summarizes construction projects and associated BMPs (structural and non-structural) performed and anticipated.

In PY3 there were six (6) active construction projects within the urbanized area disturbing more than one (1) acre:

- 2015.12 – Exits 32, 36, and 46 NB Toll Upgrades – Biddeford/Saco/Portland
- 2015.09 – Exit 53 Toll Upgrades – Falmouth
- 2015.06 – Saco Toll Plaza Lane Addition & VMS Relocation – Saco
- 2015.01 – Falmouth Pavement Rehab & Clear Zone – Portland/Falmouth
- 2014.16 – York River Bridge Repair – York
- 2014.10 – Exit 80 Interchange Improvements (Phase II) – Lewiston

Active construction projects in PY3 were documented under MTA's CPEC Program, which includes inspection documents, stormwater requirements and other environmental compliance considerations. MTA continues to rely on binding contract language to ensure that contractors comply with the construction-related BMPs/requirements of (1) Chapter 500; (2) applicable portions of the MOA; (3) the Maine Construction General Permit (CGP); and (4) the MS4 permit. MTA employees and contractors are trained appropriately on construction site stormwater management controls. Contractors and MTA personnel are required to conduct weekly inspections and maintain inspection documentation for review when performing construction that disturbs land (regardless of whether the disturbance exceeds one acre). The CPEC Program requires projects to be inspected as follows:

- Prior to construction (e.g., photographic documentation, temporary BMPs in place, etc.);
- On a weekly basis during construction by a qualified MTA representative (e.g., Inspector or Engineer) along with the contractor's OSRP, who is appropriately trained;
- When transitioning from construction to post-construction (i.e., prior to submitting the Notice of Termination [NOT] for the CGP); and
- As part of routine CPEC Program audits.

The CPEC Program provides a mechanism to ensure that stormwater requirements and other environmental regulatory obligations, including inspections and corrective actions, are considered and documented during construction and appropriate actions are undertaken to reduce pollutants in stormwater from construction activities. As a result of the effectiveness of the CPEC Program, no significant corrective actions were required in PY3 for projects in which multiple Maine DEP permits may apply (i.e., MS4, CGP, and Ch500/MOA). The non-significant corrective actions required during PY3 included routine housekeeping measures such as:

- Adjusting/reinstalling silt fences;
- Removing accumulated sediment at silt fences;

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<sup>3</sup> The MOA requires all State transportation system projects undertaken by or under the administration, supervision, or oversight of MaineDOT and MTA meet the Basic Standards in Chapter 500, regardless of location or size. Therefore, the Annual MOA Report includes projects within the MS4 UA as well as other construction projects throughout the MTA system.



- Re-staking hay bales; and
- Re-loaming and seeding or mulching areas after a storm event.

## **MCM 5 – POST-CONSTRUCTION STORMWATER MANAGEMENT**

### ***Goals:***

- 1. Continue to implement and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre.*
- 2. Develop and implement strategies that include a combination of structural and/or non-structural best management practices (BMPs).*
- 3. Develop and implement an approved BMP inspection schedule that at a minimum stipulates that new BMPs are inspected at least once during the first year of installation.*

### **BMP 5.1 CONTINUE TO IMPLEMENT CONSTRUCTION PROJECT ENVIRONMENTAL COMPLIANCE (CPEC) PROGRAM**

Similar to **MCM 4**, MTA has continued to implement and enforce the CPEC Program to address post-construction stormwater management in new development and redevelopment. MTA has previously implemented MS4 elements related to post-construction stormwater management for new development and redevelopment to minimize water quality impacts (e.g., training employees on long-term O&M practices, etc.). In PY3, MTA maintained and enforced these requirements, as well as post-construction standards associated with Chapter 500 and the MOA throughout MTA's ROW regardless of size or location. MTA provides a summary of these annual O&M practices to Maine DEP in the Annual MOA Report, which was most recently submitted to Maine DEP in September 2016.

### **BMP 5.2 INCLUDE A COMBINATION OF STRUCTURAL AND NON-STRUCTURAL BMPs**

As discussed in **BMP 1.2**, MTA continues to maintain and implement the existing BMP Adoption Plan that identifies target BMPs to be utilized by employees and contractors that minimize stormwater pollution. MTA's CPEC Program requires that contractors conducting work on projects located within UA receive and review a copy of this plan.

### **BMP 5.3 INSPECT BMPs AT LEAST ONCE DURING THE FIRST YEAR AFTER INSTALLATION**

To ensure that adequate long-term O&M of post-construction BMPs, MTA develops and implements a project-specific post-construction O&M plan for each construction project as part of the CPEC Program. These O&M plans include a GIS-based site plan and an inspection tracking form that are used by Highway Maintenance personnel to conduct quarterly inspections for the first year after final stabilization. Following the first year, newly constructed BMPs are incorporated into MTA's IDDE maps and tracking forms, and included in the annual infrastructure inspections completed by MTA's general engineering consultant for long-term inspection and maintenance. Highway Maintenance personnel have been trained and certified under Maine DEP's Non-Point Source (NPS) Program. In addition, these qualified personnel are also trained internally to implement the post-construction O&M plan aspects of CPEC Program. O&M plans are maintained in the project-specific CPEC binders and are available to Maine DEP upon request.

Post-construction BMP summary for PY3:

- Number of new post-construction BMPs discharging directly into waters of the State other than groundwater or into or from their separate storm sewer system: **0**
  - New post-construction BMPs in PY3 were limited to vegetated and riprap areas
- Number of projects with post-construction BMPs that were maintained or rehabilitated as part of construction activities during PY3: **3**

- 2015.09 – Exit 53 Toll Upgrades – Falmouth: existing check dams, culverts, and ditches
- 2015.06 – Saco Toll Plaza Lane Addition & VMS Relocation – Saco: existing culverts, ditches, and stone downspouts
- 2015.01 – Falmouth Pavement Rehab & Clear Zone – Portland/Falmouth: existing culverts, ditches, and catch basins
- Number of post-construction BMPs that were in the process of being constructed during PY3: **2**
  - 2015.12 – Exits 32, 36, and 46 NB Toll Upgrades: Two Underdrained Soil Filter (USF) systems will be installed at Exit 32 by the close of the contract (6/1/2018).
- Number of sites inspected within the first year of installation to document their functioning post-construction BMPs: **5**
  - 2013.11 – Exit 52 and Blackstrap Road Bridge Repairs – Portland/Falmouth
  - 2013.10 – Androscoggin River Bridge Repairs – Auburn/Lewiston
  - 2013.05 – Old Lisbon Road Bridge Rehab – Lewiston
  - 2012.06 – Bridge Repairs Leighton Road, Mountain Road, and Hunts Hill Road – Falmouth/Gray
  - 2012.05 – Presumpscot River Bridge Repair – Portland/Falmouth
- Number of sites that required routine maintenance or remedial action to maintain post-construction BMP functionality (not including those maintained during construction above): **0**

## **MCM 6 – POLLUTION PREVENTION/GOOD HOUSEKEEPING**

### ***Goals:***

*Reduce pollutant runoff from MTA's roads, other paved surfaces, infrastructure, and facilities through the development and implementation of an operation and maintenance (O&M) program.*

### **BMP 6.1 INVENTORY POTENTIAL POLLUTANT SOURCES AND OPERATIONS**

MTA does not operate any maintenance facilities within the MS4 regulated area, therefore, potential pollutant sources are generally limited to spills associated with vehicular accidents, road-killed wildlife, and MTA deicing operations. MTA began re-evaluating its inventory of potential pollutant sources in PY3. As of June 30, 2016 MTA had completed the following:

- Compiled draft documentation that summarizes facilities and operations and identifies those that are within the UA and UIS watersheds;
- Identified potential pollution sources for MTA facilities and operations;
- Compiled existing SOPs related to managing pollutant sources; and,
- Updated SOPs to reflect MS4 permit requirements and document pollutant source management (e.g., litter removal, catch basin sediment storage) within a single document.

MTA finalized the MCM 6 Written Procedures in August 2016 and a copy of the document is included as an attachment to this Annual Report.

### **BMP 6.2 ANNUAL EMPLOYEE TRAINING**

As discussed in **BMP 1.1**, MTA's existing employee training program addresses stormwater pollution prevention and erosion and sediment control and is revised, as appropriate. MTA's training program also incorporates construction and post-construction inspection and O&M requirements. Approximately

86 MTA employees were trained in stormwater pollution prevention and ESC practices during six 2.5-hour training sessions held in May and June of 2016. The average test score for the 2016 stormwater training was 91%. The testing results provide documentation of the effectiveness of the training.

#### BMP 6.3 STREET SWEEPING

As reported in previous MS4 permit cycles and the Annual MOA Report, MTA maintains a regular pavement sweeping program ensuring that all paved surfaces within the Urbanized Area (including interchanges, toll plazas, park-and-ride lots and other facilities) are swept at least once per year and as soon as possible after snowmelt, with priority given to paved areas within UIS watersheds. Specifics on sweeping and other pollution prevention/good housekeeping measures are tracked as part of the Annual MOA Report, and have been summarized below. MTA generally reuses the collected sweepings as construction fill material.

Urbanized Area Street Sweeping Summary for PY3:

- Approximate number of lane miles swept: **136**
- Approximate number of local road overpasses swept: **10**
- Approximate number of toll/interchange areas swept: **13**
- Approximate number of parking areas swept: **2**

#### BMP 6.4 CLEANING OF STORMWATER STRUCTURES INCLUDING CATCH BASINS

As discussed in **BMP 3.2**, MTA has a prioritized inspection program that includes inspection and catch basin cleanout, as needed, within the entire UA. Priority is given to Long Creek, Goosefare Brook, and Hart Brook watersheds; however, maintenance crews also inspect and cleanout, as needed, the remaining stormwater infrastructure in the UA on an annual basis. MTA continues to use tracking forms to capture dry weather inspection and catch basin cleanout information, which are summarized below and available to Maine DEP upon request.

Urbanized Area Catch Basin Maintenance Summary for PY3:

- Approximate number of catch basins inspected: **557**
- Approximate number of catch basins cleaned: **64**
- Approximate number of catch basins repaired: **6**

Catch basin sediment is sampled in accordance with Maine DEP regulations regarding the beneficial reuse of this material and, depending on the analytical results, MTA either reuses the collected sediment as construction fill material or disposes of the material in accordance with current State regulations (rules). MTA generally reuses the recovered catch basin sediment as construction fill material.

#### BMP 6.5 MAINTENANCE AND UPGRADING OF STORMWATER CONVEYANCES AND OUTFALLS

As part of MTA's Stormwater MOA, progress reports summarizing current and planned construction projects and maintenance efforts (which may include new drainage infrastructure installed or replaced by MTA maintenance crews) are submitted annually to Maine DEP. In 2015 and 2016, the majority of MTA construction efforts continued to focus on bridge repair/maintenance projects and pavement rehabilitation. Drainage infrastructure repairs are typically included as part of pavement rehabilitation projects and infrastructure maps and IDDE tracking forms are updated annually to reflect new drainage infrastructure.

An annual inspection of MTA's infrastructure is conducted by a professional engineering consultant.

The resulting *Annual Inspection Report* and *Operation and Maintenance Annual Report* are available on MTA's website (<http://www.maineturnpike.com/project-and-planning/Transportation-Planning.aspx>). These reports summarize the condition of MTA's infrastructure (including drainage infrastructure) and identify any deficiencies observed. MTA uses the information presented in these reports to evaluate and implement a prioritized schedule for repairing or upgrading conveyances, structures and outfalls as required under this MCM.

In addition to contracted construction and maintenance activities (described above), MTA highway maintenance staff removed impervious cover at two locations.

- Lewiston Park & Ride: removed approximately 0.71 acres of pavement and converted the area to vegetated buffer.
- Former Lewiston Service Plaza: removed approximately 0.65 acres of pavement and converted the area to vegetation.

#### BMP 6.6 STORMWATER POLLUTION PREVENTION PLANS (SWPPPs)

Although MTA does not operate any vehicle maintenance facilities within UA, MTA continues to implement the following measures relative to the objectives of **MCM 6**:

- SPCC Plans with integrated stormwater pollution prevention measures for all MTA Highway/Equipment Maintenance Facilities that address the proper use, storage and disposal of petroleum products, and additionally address vehicle and equipment storage, maintenance and refueling practices;
- A Mobile SPCC Plan for all MTA's entire ROW to supplement spill response and prevention measures in the facility-specific SPCC Plans and specifically addresses more stringent practices within UA; and
- Quarterly stormwater BMP inspections at its Highway/Equipment Maintenance Facilities.

#### **CONCLUSION**

In accordance with the MPDES General Permit *Part IV(J)*, this Annual Report presents a summary of significant goals achieved during the third year (July 2015 through June 2016) of implementation of the MTA's SPMP including an evaluation of BMPs and MGs established for the six MCMs. If you have any questions concerning this Annual Report of MTA's MS4 SPMP, please do not hesitate to call me at (207) 871-7771, ext. 359.

Respectfully,



John M. Branscom  
Environmental Services Coordinator for  
Maine Turnpike Authority

**Attachment:** MTA MCM6 Written Procedures

cc: Aimee Mountain; GZA GeoEnvironmental, Inc.

# MAINE TURNPIKE AUTHORITY

## GENERAL PERMIT FOR THE DISCHARGE OF STORMWATER FROM MAINE DEPARTMENT OF TRANSPORTATION AND MTA MUNICIPAL SEPARATE STORM SEWER SYSTEMS MINIMUM CONTROL MEASURE 6 WRITTEN PROCEDURES

prepared for



*Prepared by*

**GZA GeoEnvironmental, Inc.**

477 Congress Street  
Suite 700  
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**Prepared: August 2016**

**09.0025776.02 Task 1**

# MTA - Minimum Control Measure 6 Written Procedures

## TABLE OF CONTENTS

1. INTRODUCTION .....	1
2. APPROACH .....	1
2.1 BMP 6.1: STRUCTURAL AND NONSTRUCTURAL POLLUTION PREVENTION CONTROLS.....	1
2.2 BMP 6.2: ANNUAL STAFF TRAINING .....	2
2.3 BMP 6.3: ANNUAL STREET SWEEPING PROGRAM .....	2
2.4 BMP 6.4: ANNUAL CATCH BASIN CLEANING AND OUTFALL INSPECTION IN THE URBANIZED AREA .....	2
2.5 BMP 6.5: STORMWATER INFRASTRUCTURE INSPECTION .....	3
2.6 BMP 6.6: STORMWATER POLLUTION PREVENTION PLANS FOR VEHICLE MAINTENANCE FACILITIES WITHIN THE URBANIZED AREA. ....	3
3. FACILITIES, OPERATIONS, AND POTENTIAL POLLUTANTS .....	3
3.1 TOLL PLAZAS .....	3
3.2 MAINTENANCE FACILITIES.....	3
3.3 SERVICE PLAZAS .....	4
3.4 PARK & RIDE LOTS .....	4
3.5 ADMINISTRATIVE BUILDING.....	5
3.6 MAIN LINE (TRAVEL LANES) AND INTERCHANGES .....	5

## APPENDICES

APPENDIX A	CATCH BASIN SEDIMENT MANAGEMENT SOP
APPENDIX B	ROAD KILL POLICY
APPENDIX C	LITTER REMOVAL AND SOLID WASTE MANAGEMENT SOP
APPENDIX D	STREET SWEEPINGS MANAGEMENT SOP
APPENDIX E	MOWING POLICY

# MTA - Minimum Control Measure 6 Written Procedures

## 1. INTRODUCTION

The Maine Turnpike Authority (MTA) implements and maintains a Stormwater Program Management Plan (SPMP) dated December 2013 to comply with the State of Maine Department of Environmental Protection (Maine DEP) Bureau of Land and Water Quality's *General Permit for the Discharge of Stormwater from Maine Department of Transportation and MTA Municipal Separate Storm Sewer Systems* (MS4 Permit). This document has been prepared to act as a supplement to show MTA's compliance with fulfilling Minimum Control Measure 6 (MCM 6) of the MS4 Permit.

The goal of MCM 6 is pollution prevention and good housekeeping in community/facility operations. **Table 1** identifies the MS4 Permit MCM 6 BMPs and their documentation requirements.

**Table 1: MCM 6 BMPs**

BMP	Description	MS4 Documentation
<b>BMP 6.1</b>	Implement structural and nonstructural controls to reduce stormwater pollution from facilities, buildings, and roadways.	See Section 3
<b>BMP 6.2</b>	Train employees on pollution prevention as well as erosion and sediment control.	MCM 1 Training Documentation
<b>BMP 6.3</b>	Sweep paved areas at least once per year as soon as possible after snowmelt.	MOA Quarterly reporting
<b>BMP 6.4</b>	Complete annual catch basin cleanout, and inspect stormwater outfalls within the urbanized area.	Catch basin cleaning & IDDE reporting form
<b>BMP 6.5</b>	Inspect infrastructure (including stormwater conveyance structures and outfalls) and prioritize repairs and upgrades.	MTA Annual Comprehensive Inspection report
<b>BMP 6.6</b>	Implement Stormwater Pollution Prevention Plans (SWPPPs) for vehicle maintenance facilities operated by the permittee within the Urbanized Area.	Not Applicable

## 2. APPROACH

The following sub-sections describe MTA's approach for implementing the pollution prevention and good housekeeping BMPs identified in MCM 6.

### 2.1 BMP 6.1: STRUCTURAL AND NONSTRUCTURAL POLLUTION PREVENTION CONTROLS

The MTA has developed an inventory of potential pollutant sources and associated operations which is summarized in **Section 3** along with the Operations and Maintenance (O&M) procedures that are implemented in company policies and Standard Operating Procedures (SOPs) to reduce stormwater pollution. Policies/SOPs are referenced in the text and/or included in the **Appendices** of this document.

**Table 2** identifies the structural and nonstructural controls to reduce stormwater pollution from each operational area.

**Table 2: Operations, Potential Pollutants, and Policy/SOP Names**

Operation(s)	Potential Pollutant Source	Policy/SOP Name	Document Location
<b>Catch Basin Cleaning</b>	Catch Basin Sediment	Catch Basin Sediment Management SOP	Appendix A
<b>Equipment &amp; Vehicle Maintenance</b>	Hazardous Materials and/or Hazardous Waste	Hazardous Waste Management Plan	On file in Environmental Services Coordinator office and Environmental File at each Maintenance Facility.
<b>Fuel Oil Delivery</b>	Petroleum Products	Notice to Oil/Fuel Delivery Truck Drivers	Posted at Loading/Unloading Areas
<b>Mobile Equipment Refueling</b>	Petroleum Products	Mobile Refueling SPCC Plan	On file in Environmental Services Coordinator office.
<b>Road-Killed Wildlife</b>	Solid Waste	Road Kill Policy	Appendix B
<b>Solid Waste Collection</b>	Solid Waste	Litter Removal and Solid Waste Management SOP	Appendix C
<b>Spills from Motor Vehicle Accidents</b>	Petroleum and/or Hazardous Materials	Approaching Collisions and Hazardous Material Incidents - First on the Scene Emergency Procedures	On file in Environmental Services Coordinator office.
<b>Street Sweeping</b>	Street Dust Within the Travel Lanes	Street Sweepings Management SOP	Appendix D
<b>Universal Waste Collection</b>	Universal Waste	Hazardous Waste Management Plan	On file in Environmental Services Coordinator office and Environmental File at each Maintenance Facility.
<b>Vegetation Management</b>	Landscaping Chemicals (e.g., Pesticides, Herbicides, etc.)	Mowing Policy	Appendix E
		Pesticide Manual	On file in Environmental Services Coordinator office.
<b>Winter Road Maintenance</b>	Deicer Products	Snow and Ice Control Procedures Manual	On file in Environmental Services Coordinator office.
		Draft Winter Maintenance BMP Manual	On file in Environmental Services Coordinator office.

**2.2 BMP 6.2: ANNUAL STAFF TRAINING**

The MTA conducts annual training for its staff (in accordance with the SPMP implementation guidelines for MCM 1) that includes awareness and pollution prevention SOPs for the source areas listed above. The annual training meets local, State, and federal regulatory training requirements.

**2.3 BMP 6.3: ANNUAL STREET SWEEPING PROGRAM**

The MTA conducts annual street-sweeping to remove grit and fines associated with winter road maintenance activities each spring after snow-melt. Materials recovered during the annual sweeping operations are managed in accordance with the Street Sweepings Management SOP (**Appendix D**).

**2.4 BMP 6.4: ANNUAL CATCH BASIN CLEANING AND OUTFALL INSPECTION IN THE URBANIZED AREA**

The MTA conducts annual catch basin cleanout and outfall inspections within the Urbanized Area. Materials recovered during the annual catch basin cleanout are managed in accordance with the Catch Basin Sediment Management SOP (**Appendix A**).



## 2.5 BMP 6.5: STORMWATER INFRASTRUCTURE INSPECTION

A comprehensive inspection of the MTA infrastructure is conducted on an annual basis by MTA's general engineering consultant. This annual inspection includes observation of all MTA-owned infrastructure, including conveyance structures and outfalls. A prioritized list of repairs and upgrades are then presented to MTA Highway Maintenance and/or Engineering for consideration.

## 2.6 BMP 6.6: STORMWATER POLLUTION PREVENTION PLANS FOR VEHICLE MAINTENANCE FACILITIES WITHIN THE URBANIZED AREA.

The MTA does not currently operate any vehicle maintenance facilities within the Urbanized Area.

## 3. FACILITIES, OPERATIONS, AND POTENTIAL POLLUTANTS

The following sub-sections describe MTA facilities, the associated operations, and an inventory of potential pollutant sources.

### 3.1 TOLL PLAZAS

The MTA operates both barrier and interchange toll plazas along their corridor. **Table 3** summarizes the toll plazas within the Maine Turnpike corridor, and those which are located in the urbanized area and subject to MS4 permit requirements are indicated with an asterisk (\*).

**Table 3: Toll Plaza Facilities List**

Plaza Name	Mile Marker	Plaza Name	Mile Marker
York Barrier Toll Plaza*	7.3	Exit 47 Toll Plaza*	47.3
Exit 19 Toll Plaza	19.3	Exit 48 Toll Plaza*	48.5
Exit 25 Toll Plaza	25.5	Exit 52 Toll Plaza*	51.6
Exit 32 Toll Plaza*	31.6	Exit 53 Toll Plaza*	52.4
Exit 36 Toll Plaza*	35.7	Exit 63 Toll Plaza	63.1
Exit 42 Toll Plaza*	42.5	New Gloucester Barrier Toll Plaza	67.0
Exit 44 Toll Plaza*	44.3	West Gardiner Barrier Toll Plaza	100.2
Exit 45 Toll Plaza*	44.9	Exit 102 Toll Plaza	102.0
Exit 46 Toll Plaza*	46.3	Exit 103 Toll Plaza	103.0

\* Indicates a toll plaza located in the Urbanized Area.

The toll plazas are operated solely for toll fare collection purposes and generally include an employee building, multiple toll booths, and an employee parking area. Potential pollutants at the toll plazas include petroleum products from motor vehicle accidents, universal waste, deicer products from winter maintenance operations, and solid waste.

### 3.2 MAINTENANCE FACILITIES

The MTA operates eight maintenance facilities along their corridor (**Table 4**). None of the maintenance facilities are located within the Urbanized Area.

**Table 4: Maintenance Facilities List**

Facility Name	Mile Marker	Facility Name	Mile Marker
York Maintenance Facility	6.3	Gray Maintenance Facility	63.3
Kennebunk Maintenance Facility	25.3	Auburn Maintenance Facility	76.9
Crosby (South Portland) Maintenance Facility	45.8	Litchfield Maintenance Facility	92.6
Sign Shop/Central Inventory Warehouse (Cumberland)	58.3	West Gardner Maintenance Facility	101.8

Various potential pollutant sources are associated with each facility depending on the operations performed and materials stored at a respective facility. Typical operations include equipment maintenance, equipment storage, loading/unloading of bulk products (e.g., liquid deicer, sand, and salt), and fuel delivery. In an effort to address potential pollutant sources, the MTA has implemented Spill Prevention and Stormwater Best Management Practices (SW BMP) Plans at the maintenance facilities (with the exception of the Sign Shop). The Plans are reviewed and modified as appropriate to address changes at a respective facility.

The MTA conducts annual training for maintenance personnel that includes stormwater pollution prevention, facility-specific spill prevention and SW BMP plan elements, erosion and sediment control practices, hazardous/universal waste management, and emergency response procedures.

### 3.3 SERVICE PLAZAS

The MTA operates five service plazas along their corridor (**Table 5**). None of the service plazas are located within the Urbanized Area.

**Table 5: Service Plazas**

Facility Name	Mile Marker	Facility Name	Mile Marker
Kennebunk Service Plaza	25.5 (NB)	Gray Service Plaza	59.0 (NB)
Kennebunk Service Plaza	25.5 (SB)	West Gardiner Service Plaza	101.7 (NB)
Cumberland Service Plaza	58.5 (SB)		

The service plazas generally include restaurants, gas/diesel stations, and a parking area. Potential pollutants at the service plazas include petroleum products (fuel loading/unloading, motor vehicle refueling and motor vehicle accidents), universal waste, deicer products from winter maintenance operations, and solid waste.

### 3.4 PARK AND RIDE LOTS

The MTA owns and operates nine (9) park and ride lots along their corridor (**Table 6**), and those which are located in the urbanized area and subject to MS4 permit requirements are indicated with an asterisk (\*).

**Table 6: Park and Ride Lots List**

Facility Name	Capacity	Facility Name	Capacity
Exit 19, Wells	100	Exit 63, Gray	129
Exit 25, Kennebunk	52	Exit 75, Auburn*	137
Exit 32, Biddeford*	155	Exit 80, Lewiston*	92
Exit 42, Scarborough*	66	Exit 102, West Gardiner	54
Exit 46, South Portland*	68		

\* Indicates Park & Ride Lot located in the Urbanized Area

The park and ride lots are intended for commuter use only, for 24 hours or less. Recreational vehicles and commercial trucks are not allowed in these lots. Potential pollutants at the park and ride lots include petroleum products from motor vehicle accidents and deicer products from winter maintenance operations.

### 3.5 ADMINISTRATIVE BUILDING

The MTA operates an administrative building located at 2360 Congress Street in Portland. The administrative building was constructed in 2007 and maintains a Chapter 500 Stormwater Discharge Permit which is recertified every 5 years. The potential pollutant sources at the administrative building include universal waste, deicer products from winter maintenance operations, and solid waste.

### 3.6 MAIN LINE (TRAVEL LANES) AND INTERCHANGES

The MTA operates 109 miles of travel lanes and associated access ramps and rights-of-way that are maintained along the Main Line corridor. The primary sources of pollutants along the Main Line corridor are related to motor vehicle usage and maintenance of the roadways and rights of way. Such pollutant sources include mobile refueling, vegetation management, and winter maintenance. Occasionally motor vehicle accidents (between vehicles as well as between vehicles and animals) may result in additional pollutant sources.

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**APPENDIX A - CATCH BASIN SEDIMENT MANAGEMENT SOP**

## MAINE TURNPIKE AUTHORITY

### Storage, Handling and Management Procedures For Catch Basin Sediment

- All catch basin sediment collected from roadways and parking areas that are not managed under other programs (i.e., Hazardous Waste) will be managed in accordance with the Maine DEP's *Guidance on Disposal & Use of Assorted Solid Wastes Generated in Maine* beneficial reuse requirements.
- Sediment shall be collected and stockpiled at a nearby maintenance facility prior to sampling, disposal, and/or reuse.
- Four composite samples representative of catch basin sediment removed in one year shall be analyzed for Total Petroleum Hydrocarbons (TPH) prior to reuse.
- Up to 200 cubic yards of sediment per maintenance facility per year with a TPH concentration of less than 500 ppm may be used as non-residential construction fill as defined in Chapter 400.1.GG on MTA-owned property.
- If the composite sample analytical result shows a TPH concentration greater than 500 ppm, the sediment shall be disposed of in accordance with current State regulations (rules).



**APPENDIX B – ROAD KILL POLICY**

## Chapter 9

### Road Kill Disposal

#### MAINE TURPIKE AUTHORITY ROAD KILL POLICY

Issued: DRAFT-Confidential

#### Introduction

This policy documents details the Maine Turnpike Authority's position on animal road kill disposal procedures resulting from Turnpike roadway.

#### Notification

MTA employees while on duty on the Turnpike roadway must notify the radio dispatcher at Headquarters as soon as possible upon discovery of a dead animal in the turnpike right-of-way.

#### Disposal Options:

##### Option #1:

The MTA employee will move the dead animal out of the Turnpike right-of-way and if feasible, will place the animal carcass into the adjacent woods as a means of disposal.

##### Option #2:

If there are nearby residential and or commercial property that makes this option not feasible, then the MTA employee will transport the animal carcass to the nearest MTA Highway Maintenance Facility located at (Gardiner, Litchfield, Auburn, Gray, Crosby, or York) for burial.

The MTA employee will bury the animal carcass in the back section of the highway maintenance facility. MTA prohibits burying dead animals into wetlands adjacent to the existing yard at the highway maintenance facilities.

**APPENDIX C - LITTER REMOVAL AND SOLID WASTE  
MANAGEMENT SOP**



## MAINE TURNPIKE AUTHORITY

### Storage, Handling and Management Procedures For Litter Removal and Solid Waste Management

- Periodically MTA staff shall remove litter from MTA-owned roadways, parking areas, and facilities. All solid waste collected from roadways and parking areas that are not managed under other programs (i.e., Hazardous Waste) must be properly disposed of in solid waste collection areas.
- Solid waste receptacles (dumpsters) shall be covered, maintained to minimize leakage, and placed on a flat surface so as not to obstruct any stormwater infrastructure such as catch basins or ditches.
- The area around the solid waste receptacles shall be kept clean and free of litter and debris.
- Solid waste receptacles shall be emptied periodically and contents disposed of at a licensed solid waste disposal facility.



**APPENDIX D – STREET-SWEEPINGS MANAGEMENT SOP**

## **MAINE TURNPIKE AUTHORITY**

### **Storage, Handling and Management Procedures For Street Dust Sweepings**

- All sweepings collected from roadways and parking areas that are not managed under other programs (i.e., Hazardous Waste) may be reused as construction fill.
- Sweepings shall be collected and stockpiled at a nearby maintenance facility for reuse as construction fill.



**APPENDIX E – MOWING POLICY**

# MAINE TURNPIKE AUTHORITY

## Standard Operating Procedure

### For Mowing and Vegetation Control

- For the purposes of this SOP, four vegetation control areas have been defined: the mainline, the interchanges, the toll plazas, and the service plazas.
- The mowing timelines have been developed in order to provide ground-nesting birds the opportunity to raise a brood and to permit insects the opportunity to complete their lifecycles. These timelines also allow vegetation to regenerate and provide nesting cover the following year.
- The mainline mowing of the median and side slopes will occur as required to keep the area free of obstructions. Ditch mowing will begin no earlier than July 15, and the side slopes will not be mowed prior to August 1.
- The interchange ramp mowing will be conducted the in the same manner as the mainline, median and side slopes. The interchange infield area (generally the area between the ramp and the mainline) will not be mowed prior to August 1st.
- The toll plaza and service plaza areas will be mowed as required.

