Maine Turnpike Authority
2360 Congress Street
Portland, Maine 04102

VIA E–MAIL

September 14, 2012

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

SUBJECT: Maine Turnpike Authority (MTA)
Stormwater Program Management Plan (SPMP)
Maine DEP Permit # MER043001
Annual Report for Permit Year 4 (July 2011 through June 2012) (PY4)

Dear David:

On behalf of Maine Turnpike Authority, I am pleased to submit this Annual Summary Report for Permit Year 4 (PY4), which satisfies 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).

This Annual Summary Report describes MTA's program of Best Management Practices (BMPs) accomplished and status of Measurable Goals (MGs) for each of the six Minimum Control Measures (MCMs) for PY4, which were originally presented in MTA's SPMP (dated December 2008). In short, MTA has successfully met the PY4 requirements as outlined in the SPMP.

A current copy of the SPMP is not included in this report, as it was submitted to the Maine Department of Environmental Protection (Maine DEP) in December 2008. The Plan remains unchanged and is still current and applicable with the exception that a small stretch of Urbanized Area (UA) was identified in the Town of Kittery during PY2. As originally noted in the PY3 annual report, this minor update was addressed in **Table 1 – Summary of MTA Facilities and Other Features within UA**, as well as discussions relative to MCM 1 and 3 in the PY3 letter report.

BACKGROUND

In accordance with Part IV(A) of the MPDES MS4 General Permit, MTA's SPMP was developed 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 within UAs to the maximum extent practicable to protect water quality, and to satisfy the appropriate water quality requirements of the Clean Water Act (CWA). MTA's SPMP and accompanying Notice of Intent

(NOI), which were submitted to the Maine DEP in December 2008, outline the program of BMPs and MGs that MTA has incorporated to meet the requirements of the following six MCMs:

1. Public education and outreach on stormwater impacts;
2. Public Involvement and Participation;
3. Illicit Discharge Detection and Elimination (IDDE);
4. Construction site stormwater runoff control;
5. Post-construction stormwater management in new development and redevelopment; and
6. Pollution prevention/good housekeeping for community/facility operations.

For each of the MCMs, MGs have been established to evaluate the designated BMPs. These MGs have been assigned an implementation schedule and/or milestones for implementation of applicable BMPs. Additionally, specific MTA personnel are delegated the responsibility for implementing each BMP. The work plan/implementation schedule, which summarizes the MCMs, MGs, applicable BMPs and the designated responsible party's name and job title as found in the SPMP, has been updated to include a summary of achievements and completed goals for PY4. This summary is included in this report as **Table 2 – Stormwater Program Management Plan (SPMP) Implementation Schedule.**

The following sections present a summary of achievements and completed goals for the fourth year of implementation (PY4) and evaluation of the SPMP requirements.

SUMMARY OF SPMP PERMIT YEAR 4 ACHIEVEMENTS AND COMPLETED GOALS

In accordance with the MPDES General Permit Part IV(J), this Annual Summary Report presents a summary of significant goals achieved during the fourth year (July 2011 through June 2012) of implementation of the MTA's SPMP including an evaluation of BMPs and MGs established for the six MCMs discussed above. Specifically, Part IV(J) of the permit requires the following annual documentation relative to the SPMP:

MPDES Part IV(J)(1) -- By September 15, 2009, and annually thereafter by September 15, the permittee shall submit a report for the Department's review and approval…The report must include the following:

a. The current copy of the Plan (including a detailed implementation schedule), status of compliance with permit conditions, an assessment of the appropriateness of identified BMPs and progress towards achieving identified measurable goals for each of the MCMs.

The SPMP has not been modified or updated since its submittal to the Maine DEP on December 19, 2008. Therefore, a current copy of the SPMP is not included with this Annual Summary Report. However, the revised copy of **Table 1** has been included, which presents the UA within MTA's right-of-way (ROW) including the additional UA in the Kittery area. Furthermore, all of the MCMs, MGs, and BMPs are summarized in the work plan/implementation schedule presented in **Table 2** of this report.

b. Results of information collected and analyzed, including monitoring data, if any, during the reporting period.

No water quality monitoring data, including field screening or laboratory analysis, was conducted during this reporting period (PY4). However, data relative to each BMP and MG are summarized in the section for each specific MCM. For example, some of the process and impact indicators evaluated for **MCM 1** are included in the narrative section for **MCM 1** (see

below); the number and type of inspections conducted as part of the Illicit Discharge Detection and Evaluation (IDDE) program are included with the summary for **MCM 3**.

c. A summary of the stormwater activities the permittee intends to undertake pursuant to its Plan during the next reporting cycle.
d. A change in identified measurable goals that apply to the program elements.

No significant changes to the SPMP implementation schedule or MGs have been proposed for Permit PY4 or are anticipated for PY5. Although no Memorandum of Agreement (MOA) was developed in coordination with Maine DEP and MaineDOT (as originally indicated in the SPMP under **MCM 4 and 5**), MTA continues to enforce these MCMs through contract documents and has developed a Construction Project Environmental Compliance (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 BMP Adoption Plans into project-specific documents for MTA contractors and employees alike). Please refer to **Table 2** copied directly from the SPMP for a listing of achieved MGs in PY1 through PY4 (in blue font) and proposed MGs for PY5 (in black font).

e. *A summary describing the activities, progress, and accomplishments for each of the MCM #1 through #6 (including such items as status of education and outreach efforts, public involvement activities, stormwater mapping efforts, dry weather inspections, detected illicit discharges, detected illicit connections, illicit discharges that were illuminated, construction site inspections, number and nature of enforcement actions, post construction BMP status and inspections, and the status of the permittee's good housekeeping/pollution prevention program).*

A summary of achievements and completed goals for PY4 is shown on attached **Table 2** and the primary or key results are summarized for each MCM in the subsections below. No correspondence has been received from Maine DEP regarding the PY3 Annual Report. At the request of Maine DEP, additional supporting documentation has not been attached to this annual report, but can be made available to Maine DEP upon request.

MCM 1 – Public Education and Outreach on Stormwater Impacts: As shown on **Table 2**, the revised SPMP training program was conducted for MTA 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) topics, as well as Erosion and Sedimentation Control (ESC) practices, was performed primarily in May 2012 by regulatory specialists from GZA GeoEnvironmental, Inc. and MTA alike. The training was attended by approximately 98 MTA employees[1]. Prior to conducting training, the combined SPCC/Stormwater/ESC training curriculum was updated circa April 2012 to reflect the following information:

- Revisions to MTA's IDDE (see Table 2);
- Requirements within the Long Creek watershed and other areas where watershed management plans (WMPs) are emerging;

[1] Please note that in years past MTA has generally provided training for approximately 111 to 130 employees; the reason for the decrease in attendants since PY1 is twofold. First, these training sessions are generally conducted throughout the month of May and initially included seasonal employees, who assisted with winter plowing through April; however, seasonal employees were not working during training and therefore did not attend. Second, the training sessions for building maintenance staff were limited to spill prevention topics and has not address the full spectrum of stormwater management topics since PY2; therefore, MTA training efforts focused primarily on comprehensive training for personnel routinely involved in inspecting stormwater infrastructure, performing stormwater maintenance activities and conducting earthwork activities.

- Quarterly and annual reporting associated w MTA's Annual 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.

In addition to these updates, MTA SPCC/Stormwater/ESC training sessions held in 2012 also re-emphasized the training updates from PY1, PY2 and PY3, which included (but were not limited to) the following:

- Revisions to the MPDES MS4 Permit requirements (i.e., IDDE policy changes to reflect ditch/outfall requirements and more);
- Additional UA identified in York and Kittery (i.e., a summary of UA reviewed that is similar to **Table 1** of this report);
- Introduction of MTA's MS4 UIS strategy, which identified Goosefare Brook and Hart Brook as MTA's two designated highest priority watersheds with considerations of other UIS watersheds (e.g., Long Creek, Capisic Brook, Red Brook, etc.);
- MTA's Mobile SPCC Plan, which includes procedures regarding refueling of mobile equipment, such as mowers, loaders and other heavy equipment (i.e., avoid and minimize refueling within UA and Urban Impaired Streams [UIS] watersheds); and
- Development and implementation of new MTA CPEC program, post-construction O&M Plans including BMP inspection forms for maintenance activities;

Also as part of **MCM 1**, MTA has adopted an Awareness Plan and BMP Adoption Plan. Both of these Plans were provided as handouts during training and discussed to ensure that all MTA employees are aware of the three goals of this MCM in PY1 through PY4:

1. To raise awareness that polluted stormwater runoff is the most significant source of water quality problems in Maine's waters;
2. To motivate people to use the BMPs which reduce polluted stormwater runoff; and
3. To reduce polluted stormwater runoff as a result of increase awareness and utilization of BMPs.

The training sessions described above, which included in-class test/examination and a workshop session, provided an opportunity to assess process and impact indicators associated with the Stormwater Awareness and BMP Adoption Plans drafted by MTA. The following summary of process and impact indicators has been prepared based on information collected during training sessions for MTA employees in attendance. *Comparisons to previous data collected in PY1 are presented in italic font*; *additional data for PYs can be found in* **Table 2**.

Process Indicators for PY4:

- Number of 3-hour training sessions conducted: **6** *(PY1 = 8 sessions[2])*
  - One session at each of the following MTA maintenance facilities: York, Kennebunk, Crosby/South Portland, Gray, and Gardiner; and
  - One make-up session at MTA headquarters (HQ).
- Number of MTA employees attended: **98** *(PY1 = 111 employees[3])*

[2] During PY1 and PY2, the number of sessions was eight (8). This number was reduced in PY3 and PY4 since MTA employees from Auburn, Litchfield and Gardiner Maintenance Facilities now attend a combined training session at Gardiner Maintenance.

[3] The decrease in the number of employees since PY1 has been due to the lack of seasonal employees and Building Maintenance employees attending the annual stormwater training.

Impact Indicators for PY3:

- Average test score for the SPCC/stormwater/ESC training sessions: **92%** *(PY1 = 92%)*
- Percentage of MTA employees able to identify the goals of the Stormwater Awareness and BMP Adoption Plans: **93.9% = 92 out of 98 attendees** *(PY1 = 90.9%)*
- Percentage of MTA employees able to identify (and differentiate between) a structural and non-structural BMP: **96.9% = 95 out of 98 attendees** *(PY1 = 87.5%)*
- Percentage of MTA employees who demonstrated applied knowledge of BMP-specific information (i.e., silt fence must be installed prior to disturbing land, hay mulch must be placed at the end of each day, etc.): **85.7% = 84 out of 98 attendees** *(PY1 = 82%)*
- Percentage of MTA employees able to identify sources of stormwater pollution: **94.9% = 93 out of 98 attendees** *(PY1 = 96%)*

The impact indicators provide some insight into the progress and effectiveness of the annual stormwater training sessions. In general, the impact indicators in PY4 provide demonstrated data that MTA employees remain knowledgeable in stormwater and ESC practices, as evidenced by the consistency in the average test scores from PY1 to PY4.

With respect to the Stormwater Awareness and BMP Adoption Plans, it is also important to note that MTA's CPEC Program, which was developed in PY2, requires contractors conducting work on projects located within UA to receive and review a copy of both Plans, as well. More information on MTA's CPEC Program is included in summaries for **MCMs 4 through 6.**

With respect to MTA's continuation of education and outreach efforts from the previous 5-year permit cycle, MTA offers the following accomplished MGs:

- MTA personnel (or their designee) have attended and participated in multiple public meetings, seminars, and conferences, including at least eight (8) Interlocal Stormwater Working Group (ISWG) meetings[4].
- MTA also participated in several additional stormwater-related efforts including: (1) attending Watershed Management Plan Meetings for UIS watersheds within and outside of UA; (2) publishing information on stormwater in the *Mile Post*, MTA's employee newsletter; (3) continuing a link from MTA's environmental website to the CCSWCD's yardscape program; and (4) participating in statewide salt management round table meeting and follow up discussions.
- MTA also requires, in contract documents and as part of the CPEC Program, all contractors to submit training certificates for the delegated on-site responsible party (OSRP) on MTA contracted projects to ensure they are adequately trained and knowledgeable in ESC from Maine DEP's Non-Point Source (NPS) Training Program or an equivalent program.

MCM 2 – Public Involvement and Participation: The MTA's public notice policy and scheduled public meetings during PY4 complied with the Maine Freedom of Access Act. MTA maintains a list of public meetings attended by MTA and/or their designees (e.g., counsel, consultants, etc.); MTA can provide a copy of the list of meetings to Maine DEP upon request.

[4] MTA maintains a list of public meetings, seminars and conferences to demonstrate education and outreach opportunities. This list is available to Maine DEP upon request.

MTA continues to maintain close communication with MS4 communities and their respective Stormwater Coordinators, primarily through participation in the Greater Portland Interlocal Stormwater Working Group (ISWG). MTA maintains a list of Stormwater Coordinators and meetings, which are available upon request. Additionally, MTA has continued to be closely involved with the evolving management requirements of UIS watersheds both within and outside of UA. MTA also continues to communicate periodically with host municipalities regarding watershed management planning efforts within MTA's two priority watersheds:

- Hart Brook (within UA in Lewiston); and
- Goosefare Brook (within UA in Saco).

In addition to these watershed-based efforts, MTA also was involved and participated in the following efforts in fulfillment of **MCM 2** in PY4 (that were mentioned in **MCM 1**):

- Published information on stormwater in the *Mile Post*, MTA's employee newsletter;
- Continued to provide a link from MTA's website to CCSWCD's yardscape program; and
- Attended statewide salt management round table meetings to remain abreast of follow-up discussions and subcommittee activities.

MCM 3 – Illicit Discharge Detection and Elimination (IDDE): The UA within MTA's ROW was mapped during the previous MPDES Permit cycle using 2000 Census Bureau data. Furthermore, MTA's existing MS4 maps, which include unique identifiers and flow arrows for conveyances, is supplemented by a Microsoft® Office Access database (also developed in the previous 5-year MS4 permit cycle) that contains the construction information for each outfall and catch basin, as well as the proximate receiving surface waterbody. In PY2, an additional short stretch of UA along MTA's ROW near the Kittery/York Town Line was identified, mapped and inventoried consistent with MS4 requirements described above. In PY3, GPS locations were recorded and added to MTA's mapping of existing stormwater infrastructure for two additional UIS watersheds:

- Capisic Brook watershed within UA in Portland in the vicinity of Exit 48; and
- Red Brook watershed outside UA in Scarborough and South Portland in the vicinity of Exit 44.

In PY4, MTA continued to update existing MS4 maps, which included identifying open ditches within MTA's ROW and the conversion of existing MS4 maps to maps utilizing ArcGIS (ESRI). Also in PY4, MTA's IDDE SOP was reviewed and updated to include MTA's open ditch systems to ensure that illicit discharge detection in these systems will be implemented appropriately, not only in MTA's two highest priority UIS watersheds, but within MTA's UA.

MTA continues to use tracking forms to capture dry weather inspection and catch basin cleanout information, which are available upon request to Maine DEP. The data collected during outfall inspections and catch basin cleanouts is then managed using a Microsoft® Office Access database.

Although MTA operates seven Highway Maintenance facilities from Kittery to Augusta, only four of the MTA territories intersect with UA; these include Highway Maintenance facilities located in the following areas (see **Table 1** for more information on UA and MTA territories):

- York Maintenance Facility
    - Inspects and maintains 1.1 linear miles of UA within Kittery and York
    - Includes approximately 16 catch basins (CBs) and 12 outfalls (OFs) within UA
        - 100% of CBs and OFs inspected by August 8th, 2012
        - 75% of CBs and OFs required no cleaning during PY4

- Kennebunk Maintenance Facility
  - Inspects and maintains UA within:
    - Saco (2.7 linear miles)
    - Biddeford (approximately 1 linear mile)
    - Goosefare Brook watershed (at Exit 36)
  - Includes approximately 82 CBs and 48 OFs
    - 100% of CBs and OFs inspected by June 20th, 2012
    - 100% of CBs and OFs required no cleaning during PY4
- South Portland at Crosby Farm
  - Inspects and maintains UA within:
    - Scarborough (0.4 linear mile)
    - Portland (approximately 5.2 linear miles)
    - Falmouth (approximately 2.6 linear miles)
    - Capisic Brook watershed (at Exit 48)
  - Includes approximately 129 CBs and 97 OFs in UA
    - 76% of CBs and OFs inspected by July 30th, 2012[5]
    - Approximately 25% of CBs and OFs required cleaning during PY4
  - Inspects and maintains non-UA infrastructure within the watersheds of Red Brook and Long Creek
- Auburn Maintenance Facility
  - Inspects and maintains UA within:
    - Auburn (approximately 1.1 linear miles)
    - Lewiston (slightly less than 1 linear mile of UA, but MTA has mapped all apparent CBs and OFs within the municipal boundaries)
    - Sabattus (0.7 linear mile)
    - Hart Brook watershed (in the vicinity of Exit 80)
  - Includes approximately 51 CBs and 29 OFs:
    - 86% of CBs and OFs inspected in PY4 by June 27th, 2012
    - 100% of CBs and OFs required no cleaning during PY4, since construction activities require contractors to cleanout catch basins before finishing a construction project.

MTA Highway Maintenance employees, who have been trained annually to identify, document and report all "*discharges that do not consist entirely of stormwater*" to MTA's Environmental Services Coordinator, conducted inspections and cleanouts in PY4.

- Priority was given to conducting dry weather inspections of outfalls that discharge to the two highest priority watersheds (Hart Brook and Goosefare Brook) consistent with MTA's Priority UIS strategy; additional watersheds outside UA that were inspected in PY4 include:

[5] Several sections of MTA ROW within the Crosby territory were under construction and not able to be inspected and/or cleaned out in portions of PY4.

- Long Creek watershed in South Portland (i.e., another 50 catch basins and 30 outfalls to the conveyances inspected and cleanouts tracked by MTA); and
- Red Creek watershed in Scarborough (i.e., another 14 catch basins and 5 outfalls to the conveyances inspected and cleanouts tracked by MTA).

- No illicit discharges or non-stormwater discharges were identified, however, four spills within UA occurred in PY4, which were reported to Maine DEP and cleaned up immediately before potential illicit discharges were permitted to reach stormwater infrastructure or waters of the State.
  - July 20, 2011: A patron truck struck road debris, which punctured the right side diesel saddle tank, at northbound Mile Marker (MM) 42 in Scarborough resulting in approximately 20 gallons of diesel being released to the paved shoulder and soil shoulder. which were promptly cleaned up and disposed of under the direction of the Maine DEP's spill response personnel,
  - August 18, 2011: A patron truck struck road debris at northbound Mile Marker (MM) 4.1 in Kittery resulting in 30-40 gallons of diesel being released to the paved shoulder and soil shoulder. which were promptly cleaned up and disposed of under the direction of the Maine DEP's spill response personnel,
  - September 18, 2011: A patron truck mechanically malfunctioned at southbound Mile Marker (MM) 35 in Saco resulting in 1-2 gallons of engine oil released to the paved shoulder and grass shoulder. which were promptly cleaned up and disposed of under the direction of the Maine DEP's spill response personnel,
  - June 6, 2012: A patron well drilling truck blew a tire and collided with the center median guard rail at southbound Mile Marker (MM) 50 in Portland, which caused a leak of less than 1 gallons of engine coolant (ethylene glycol).
- Sediments were removed from catch basins with priority given to (1) those located within UIS watersheds, specifically Hart Brook and Goosefare Brook; and (2) those located within the median of MTA's ROW, as sediments tend to accumulate more rapidly in these median conveyances. Sediments were disposed of in accordance with an existing Memorandum of Understanding with Maine DEP.

MCM 4 Construction Site Stormwater Runoff Controls: For many years, MTA has implemented MS4 elements to control stormwater runoff from construction sites (e.g., require contractors' OSRP to be trained by Maine DEP's NPS program and provide appropriate certification; inspect and document BMPs for construction performed by MTA employees; etc.). In PY4, MTA continues to maintain these requirements, as well as those construction-related requirements associated with Chapter 500 and the MOA, including the application of MaineDOT's BMP/ESC Manual to all projects regardless of the one acre threshold thus often exceeding the requirements of this MS4 permit.

As you know, MTA reports annually to Maine DEP regarding construction projects and associated BMPs (structural and non-structural), as part of the Annual MOA report[6]. Although the MOA report is not limited to MTA ROW within UA, active construction projects in PY4 that disturbed one acre or more within UA were documented using 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) Maine Construction General Permit (CGP); and (4) the MS4 permit. MTA employees and contractors are trained extensively on construction site stormwater runoff controls and are required to conduct weekly inspections and maintain inspection documentation for review when performing construction that disturbs land (even less than one acre). Furthermore, in PY2 MTA implemented the CPEC Program, which required the projects listed above to be inspected as follows:

[6] MTA's Annual MOA Report was submitted to Maine DEP in July 2012.

- Prior to construction (e.g., photographs taken, 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 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 taken for reducing pollutants in stormwater from construction activities. Subsequently, no significant corrective actions were required for these projects where multiple Maine DEP permits may apply (i.e., MS4, CGP, and Ch500/MOA).

MCM 5 Post-construction Stormwater Management in New Development and Redevelopment: Similar to **MCM 4**, MTA has implemented many MS4 elements related to post-construction stormwater management for new development and redevelopment to minimize water quality impacts for many years (i.e., training employees on long term O&M practices, etc.). In PY4, MTA continues to maintain these requirements, as well as post-construction standards associated with Chapter 500 and the MOA throughout MTA ROW regardless of whether or not there is a direct discharge to the waters of the State. 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 June 2012.

To ensure that adequate long-term O&M is continued for newly constructed BMPs, MTA develops and implements an O&M schedule/plan for each project as part of the CPEC Program that is incorporated into the CPEC binder for each specific project. Highway Maintenance personnel have been certified by Maine DEP's NPS Program (as reported in MTA's Annual MOA Report); these qualified personnel are also trained internally to implement the CPEC Program, specifically these post-construction O&M plans. As mentioned, the O&M plans are maintained in the CPEC binder and are available to Maine DEP upon request.

MCM 6 – Pollution Prevention (P2) and Good Housekeeping for Community/Facility Operations: As discussed under **MCM 1**, MTA employees continued to be trained in stormwater P2 and ESC practices, as well as good housekeeping practices. MTA's training program also incorporates construction and post-construction inspection and O&M requirements.

Consistent with previous years, street sweeping was given priority and was conducted within all UA as soon as possible after snow melt within the following UIS watersheds:

- Within UA: Hart Brook in Lewiston and Goosefare Brook in Saco; and
- Outside UA: Long Creek in South Portland and Red Brook in Scarborough.

Using MTA's new vacuum sweeper purchased in PY2, sweeping is conducted at least once each year on linear areas and multiple times each year in peripheral areas, such as interchanges, toll plazas, park-and-ride lots and other facilities. Specifics on sweeping and other P2/good housekeeping measures are also reported to Maine DEP each year in the Annual MOA Report[7].

[7] The number of linear miles and ancillary facilities (e.g., service plazas, overhead bridges, interchanges, etc.) is included in Table 5 of the 2011 Annual MOA Report that was submitted to Maine DEP on July 9, 2012.

As mentioned in **MCM 3**, MTA continues to operate its annual CB cleanout and OF inspection program consistent with previous years, which ensures that CBs are cleaned out, OFs are inspected and collected sediments are disposed of appropriately. A list of maintenance to conveyances and structures is generated from these annual inspections within UA to supplement the comprehensive annual inspection of MTA's infrastructure that is conducted by a qualified engineer contractor.

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**:

1. SPCC Plans with integrated Stormwater Pollution Prevention Measures for all MTA Highway/Equipment Maintenance Garages that address the proper use, storage and disposal of petroleum products, as well as non-petroleum products and other hazardous materials;
2. To supplement spill response and prevention measures in the facility-specific SPCC Plans, MTA has developed and implemented a Mobile SPCC Plan for all MTA ROW, and specifically addresses more stringent practices within UA;
3. The integrated stormwater pollution prevention measures incorporated in these SPCC and Pollution Prevention Plans address vehicle and equipment storage practices, maintenance and refueling;
4. Post-construction requirements have been developed and implemented for newly installed structural BMPs include an O&M schedule to ensure long-term maintenance;
5. Construction and post-construction inspection requirements have been implemented for all projects (even those less than 1 acre of disturbed area) in accordance with the Chapter 500 MOA; and
6. MTA maintains an existing road-killed wildlife policy.

If you have any questions concerning this Annual Summary Report of MTA's MS4 SPMP, please do not hesitate to call me at (207) 871-7771, ext. 359.

Respectfully,

John M. Branscom

John M. Branscom
Environmental Services Coordinator for
Maine Turnpike Authority

Attachments: Table 1 - *Summary of MTA Facilities and Other Features within UA*
Table 2 - *Stormwater Program Management Plan (SPMP) Implementation Schedule*

cc: Robyn Saunders; GZA GeoEnvironmental, Inc.

TABLE 1
Summary of MTA Facilities and Other Features within UA
Maine Turnpike Authority

REGULATED SMALL MS4 COMMUNITY	MILE MARKER DELINEATION [1] Northern Boundary	MILE MARKER DELINEATION [1] Southern Boundary	LINEAR DISTANCE OF UA SEGMENT (Miles)	MTA FACILITY FEATURES [2] WITHIN UA (Roadway and ROW assumed)	WATER BODIES	STREAMS [3]
SABATTUS	**MM 84.3** Lisbon Road Underpass	**MM 83.6** Sabattus Town Line	**0.7**	*None identified*	*None identified*	None identified
LEWISTON	**MM 79.6** Goddard Road Overpass	**MM 78.9** Androscoggin River	**0.7**	*None identified*	*None identified*	1 **Hart Brook**[6] (also known as Dill Brook) 2 Androscoggin River
Intermittent contact (< 0.1 mi) within Lewiston UA	**MM 81.4** Route 196 & MCRR Overpass		**< 0.1**	*None identified*		
	MM 80.8 Ferry & Cottage Road Overpass		**< 0.1**	**Exit 80** Park and Ride (parking lot)		
AUBURN	**MM 78.9** Androscoggin River	**MM 78.4** Riverside Road	**0.5**	*None identified*	*None identified*	2 Androscoggin River
	MM 75.6 Washington Street Overpass	**MM 75.0** Kitty Hawk Avenue Underpass	**0.6**	**Exit 75** Interchange (ramp) **Exit 75** Park and Ride (parking lot)		
FALMOUTH	**MM 53.4** Mountain Road Underpass	**MM 51.8** Presumpscot River	**1.6**	**Exit 53** Interchange (ramp) **Exit 53** Toll Plaza **Exit 53** West Falmouth Park and Ride (parking lot)	*None identified*	3 Unnamed tributary of Presumpscot River (crosses Turnpike near Exit 53 NB on-ramp)
	Falmouth Spur midpoint between CNRR Overpass and Falmouth/Middle Road Overpass	**Falmouth Spur** Falmouth Road/Middle Road Overpass	**≈ 0.1**	*None identified*		
	Falmouth Spur Presumpscot River	**Falmouth Spur** Portland/Falmouth Town Line	**≈ 0.9**	*None identified*		4 Presumpscot River
PORTLAND	**Falmouth Spur** Exit 52 Interchange	**Falmouth Spur** Portland/Falmouth Town Line	**≈ 0.1**	**Exit 52** Interchange (ramps and spur)	*None identified*	4 Presumpscot River
	MM 51.8 Presumpscot River	**MM 46.7** Stroudwater River	**5.1**	**Exit 52** Interchange (ramps and spur) **Exit 48** Interchange (ramps) **Exit 48** Toll Plaza **Exit 47** Interchange (ramps) **Exit 47** Toll Plaza **Exit 47** Westbrook Park and Ride (parking lot)		5 Northerly unnamed tributary of Presumpscot River (crosses Turnpike south of Riverside Street overpass) 6 Southerly unnamed tributary of Presumpscot River (crosses Turnpike south of Route 302 overpass) 7 **Capisic Brook**[6] (within Turnpike ROW south of Warren Ave overpass) 8 **Nasons Brook**[6] (crosses Turnpike south of Brighton Ave and RR overpass) 9 Stroudwater River
SCARBOROUGH	**MM 42.0** Two Rod Road Underpass	**MM 41.6** Unnamed tributary of Beaver Brook	**0.4**	**Exit 42** Scarborough Park and Ride (parking lot)	*None identified*	10 Unnamed tributary of Beaver Brook (crosses Turnpike south of Two Rod Road underpass)
SACO	**MM 35.7** Goosefare Brook	**MM 33.0** Saco River	**2.7**	**Exit 36** Interchange (ramps) Former Exit 36 Interchange (ramps) Saco Hotel and Conference Center Exit	*None identified*	11 **Goosefare Brook**[6] 12 Deep Brook 13 Cole Brook 14 Saco River
BIDDEFORD	**MM 33.0** Saco River	**MM 32.0** Thacher Brook	**1.0**	**Exit 32** Biddeford Park and Ride (parking lot)	*None identified*	14 Saco River (including wetlands on southern bank along SB lanes) 15 Unnamed tributary of Saco River (crosses Turnpike south of South Street and runs parallel) 16 Thacher Brook
KITTERY	**MM 4.2** Kittery town line	**MM 3.1** Cutts Road	**1.1**	**Rest Area** Welcome Center (operated by MaineDOT)	*None identified*	17 Libby Brook (crosses Turnpike in two places near Welcome Plaza)
MDOT Territory	**MM 2.2** Spruce Creek *(End of Turnpike)*	**MM 0.0** Maine/New Hampshire State Line	**2.2**	**Exit 1** Interchange **Exit 2** Interchange **Exit 3** Interchange		18 Spruce Creek 19 Chickering Creek 20 Piscataqua River

NOTES:

1.) Mile Marker (MM) designations for UA delineations should be considered approximate and will be confirmed and updated, as necessary and as more detailed mapping information is made available.

2.) MTA facility features identified within each host MS4 communities include the roadway (i.e., paved roads, bridges, etc.) and ROW (e.g., approximate 300-foot wide corridor along MTA roadway), as well as interchanges (i.e., approach ramps), spurs and toll plazas as indicated. "*None identified*" indicates that only MTA roadway and ROW are present within the UA delineation. This table will be updated as more detailed mapping information is made available and/or in the event that MTA facility features are constructed within UA delineations.
Please note that none of the MTA maintenance facilities are located within UA.

3.) Streams were identified by using the corresponding 7.5-minute series topographic United States Geological Survey (USGS) quadrangle. Stream locations, as well as water body information, in this table will be updated as more detailed mapping is performed and made available.

4.) Urbanized areas (UA) along the Maine Turnpike's approximate 300-foot ROW within each of the regulated small MS4 municipalities were delineated using purple cross-hatching on the corresponding USGS maps that are included in the Part A NOI submittal that is included in this document as Appendix A. UA delineation is based on the UA maps provided for each regulated municipality on the Maine Department of Environmental Protection's (DEP's) website, which include "Automatically Designated MS4 Areas".
(Reference: http://www.state.me.us/dep/blwq/docstand/stormwater/maps/index.htm)

5.) Copies of the corresponding UA maps and applicable portions of the USGS quadrangles are presented in the Part A NOI submittal that is included in this document as Appendix A.

6.) Maine DEP classifies several specific waterways within the state designed as Urban Impaired Streams (UIS). A number of these streams cross MTA's ROW in US as listed. These include: Dill Brook, Capisic Brook, Nasons Brook, and Goosefare Brook. The SPMP identifies Goosefare Brook and Dill Brook (i.e. Hart Brook) as the two priority watersheds within MTA's terrority.

TABLE 2

STORMWATER PROGRAM MANAGEMENT PLAN (SPMP) IMPLEMENTATION SCHEDULE

Maine Turnpike Authority

MINIMUM CONTROL MEASURE #1 (MCM 1)

MPDES Permit Part IV(H) 1. Public education and outreach. *The three goals of this minimum control measure are: 1. to raise awareness that polluted stormwater runoff is the most significant source of water quality problems in Maine's waters; 2. to motivate people to use Best Management Practices (BMPs) which reduce polluted stormwater runoff; and 3. to reduce polluted stormwater runoff as a result of increased awareness and utilization of BMPs. The permittee shall document changes in awareness and BMP adoption (behavior change) in target audiences.*

MCM REQUIREMENT	BEST MANAGEMENT PRACTICES (BMPs)	METHODOLOGY/PURPOSE	MEASURABLE GOALS		ACHIEVEMENTS and COMPLETED GOALS	DOCUMENTATION	RESPONSIBLE PARTY
a. Required Strategies.							
a(i) Raise Awareness (Goal 1); Beginning July 1, 2008, each permittee shall continue raising awareness of stormwater issues amongst employees and contractors. *(1) Each permittee shall establish measurable goals. Progress on these goals must be reported annually for process indicators and in years 1 (background), 3 & 5 for impact indicators.* *(2) Each permittee shall include a review in its fifth year Annual Report. The review must include an analysis of the process indicators and impact indicators.*	Develop an Awareness Plan to raise awareness of stormwater issues amongst employees and contractors **Urban Impaired Stream (UIS) Strategy:** The Awareness Plan will place emphasis on raising awareness within MTA's two designated highest priority UIS watersheds (e.g., Hart Brook and Goosefare Brook).	*The Awareness Plan's will raise awareness of polluted stormwater runoff issues and will provide for assessment of process and impact indicators.*	Year 1:	Develop an Awareness Plan for employees and contractors	Drafted an Awareness Plan for MTA employees and contractors	Maintain a copy of the Plan and associated documents (i.e., updated training, etc.)	Environmental Services Coordinator and/or Designated Consultant
			Year 2-4:	**Implement BMPs associated with Awareness Plan for employees and contractors**	**MTA continues to Increase awareness of polluted stormwater runoff issues by providing employees and contractors with MTA's Awareness Plan through employee training and/or the Construction Project Environmental Compliance (CPEC) program implemented for contracted projects in Permit Year (PY) 2, PY3 and PY4**	**Maintain a copy of the Plan and associated documents in the updated training curriculum and also in CPEC binder documents**	
				Continue following the time line and implementation schedule in Awareness Plan			
			Years 5:	Continue following the time line and implementation schedule in Awareness Plan			
		Process indicators relate to the execution of the program (e.g., percent or number of employees attending training, additional information provided at a facility or job site).	**Year 1-4:**	**Continue to assess process indicators as part of the Annual Report**	**PY1: A total of 111 MTA employees attended one of eight stormwater training sessions (each 3-hour sessions) conducted at each of the MTA highway maintenance facilities.** **PY2: A total of 95 MTA employees attended one of eight 3-hour stormwater training sessions conducted at each of the MTA highway maintenance facilities.** **PY3: A total of 93 MTA employees attended a 3-hour stormwater training session conducted at each of the MTA highway maintenance facilities.** **PY4: A total of 98 MTA employees attended a 3-hour stormwater training session conducted at each of the MTA highway maintenance facilities.** **• The Awareness Plan was provided to MTA employees and reviewed during each training session.** **• Each employee was tested on stormwater awareness topics (i.e., PY1: in-class exam; PY2: in-class "jeopardy" participation; PY3 and PY4: in-class exam).**	**Maintain training documentation to assess process indicators, which include (but are not limited to) the following:** *** training schedules,** *** sign-in/attendance rosters,** *** test/evaluations, and** *** other materials (e.g., database)**	
			Year 5:	Assess process indicators as part of the Annual Report			
		Impact indicators relate to the achievement of the goals and objectives of the program (e.g., changing behavior as a result of training/information).	Year 1:	Assess impact indicators as part of the Annual Report	The average test score for each of the 8 stormwater training sessions was 90% or higher (overall average: 92%). • Please refer to the text of the annual progress report for an assessment of additional impact indicators.	**Conduct an evaluation (i.e., exam, pop-quiz, etc.) following training to measure awareness of stormwater pollution, BMPs and/or runoff issues**	
			Year 3:	Assess impact indicators as part of the Annual Report	The average test score for each of the 6 stormwater training sessions was 90% or higher (overall average: 92%). • Please refer to the text of the annual progress report for an assessment of additional impact indicators. • Please note that the reduction in the number of training sessions held in PY3 (i.e., 6 versus 8 in PY1 and PY2) was because several sessions were combined (i.e., employees from Litchfield and Auburn Maintenance Facilities traveled to Gardiner Maintenance Facility for annual training on the same date).		
			Year 5:	Assess impact indicators as part of the Annual Report			
a(ii) Target BMP Adoption (Goal 2): Beginning July 1, 2008, each permittee shall continue outreach efforts from the previous permit cycle while encouraging employees and contractors to utilize BMPs that minimize stormwater pollution. *(1) Each permittee shall establish measurable goals. Progress on these goals must be reported annually for process indicators and in years 1 (background), 3 & 5 for impact indicators.* *(2) Each permittee shall include a review in its fifth year Annual Report. The review must include an analysis of the process indicators and impact indicators.*	Develop a BMP Adoption Plan for employees and contractors to minimize stormwater pollution **Urban Impaired Stream (UIS) Strategy:** The BMP Adoption Plan will place emphasis on utilizing target BMPs within MTA's two designated highest priority UIS watersheds (e.g., Hart Brook and Goosefare Brook).	Identify target BMPs to be utilized by employees and contractors that minimize stormwater pollution	Year 1:	Identify target BMPs to be utilized by employees and contractors	Drafted a BMP Adoption Plan for MTA employees and contractors	**Maintain compliance with Chapter 500 standards, MOA requirements and/or MaineDOT BMP Manual for MTA projects constructed and maintained**	Environmental Services Coordinator and/or Designated Consultant
			Year 2-4:	**Implement BMPs and continue to identify additional BMPs that minimize stormwater pollution**	**MTA continues to Implement BMPs and continue to identify additional BMPs that minimize stormwater pollution as part of MTA operations:** **- BMPs continue to be emphasized in CPEC program; and** **- Target BMPs are listed in MaineDOT's BMP Manual, which is referenced in contract language for MTA projects.**		
			Year 5:	Implement BMPs and continue to identify additional BMPs that minimize stormwater pollution			

Italic font: MS4 permit language
Blue font: MGs accomplished to date
Red font: UIS Strategy
Bold font: Goals achieved during current permit year

TABLE 2
STORMWATER PROGRAM MANAGEMENT PLAN (SPMP) IMPLEMENTATION SCHEDULE
Maine Turnpike Authority

MINIMUM CONTROL MEASURE #1 (MCM 1)

MPDES Permit Part IV(H) 1. Public education and outreach. *The three goals of this minimum control measure are: 1. to raise awareness that polluted stormwater runoff is the most significant source of water quality problems in Maine's waters; 2. to motivate people to use Best Management Practices (BMPs) which reduce polluted stormwater runoff; and 3. to reduce polluted stormwater runoff as a result of increased awareness and utilization of BMPs. The permittee shall document changes in awareness and BMP adoption (behavior change) in target audiences.*

MCM REQUIREMENT	BEST MANAGEMENT PRACTICES (BMPs)	METHODOLOGY/PURPOSE	MEASURABLE GOALS		ACHIEVEMENTS and COMPLETED GOALS	DOCUMENTATION	RESPONSIBLE PARTY
a. Required Strategies.							
		Process indicators relate to the execution of the program	**Year 1-4:**	**Assess process indicators as part of the Annual Report**	**• Year 1: A total of 111 MTA employees attended one of eight stormwater training sessions (each 3-hour sessions) conducted at each of the MTA highway maintenance facilities. • Year 2: A total of 95 MTA employees attended a 3-hour stormwater training session • Year 3: A total of 93 MTA employees attended a 3-hour stormwater training session conducted at one of the MTA highway maintenance facilities where annual training was offered (i.e., York, Kennebunk Crosby/South Portland, Gray, Gardiner, or make up session at MTA HQ). • Year 4: A total of 98 MTA employees attended a 3-hour stormwater training session conducted at one of the MTA highway maintenance facilities where annual training was offered (i.e., York, Kennebunk Crosby/South Portland, Gray, Gardiner, or make up session at MTA HQ). The BMP Adoption Plan was provided to MTA employees and reviewed during each training session. Each employee was tested on BMP-specific topics (i.e., PY1: in-class exam; PY2: in-class "jeopardy" participation; PY3 and PY4: in-class exam).**	**Conduct inspections of work sites to provide a baseline for future assessment of process indicators (i.e., as part of CPEC program implementation in Permit Year 2)**	
			Year 5:	Assess process indicators as part of the Annual Report			
		Impact indicators relate to the achievement of the goals and objectives of the program	Year 1 & 3:	Assess impact indicators as part of the Annual Report	Please refer to the text of the annual progress report for an assessment of impact indicators	Maintain copies of training records, inspection logs for construction, maintenance activity records and/or other documents referenced in BMP Adoption Plan to demonstrate achievement of goals and program objectives.	
			Year 5:	Assess impact indicators as part of the Annual Report			
a(iii) Compliance with this MCM will be based upon: *(1) Continued existing education and outreach efforts (existing efforts from pervious 5-year Plan are indicated in blue text);* *(2) Reported process and impact indicators; and* *(3) Completed annual reports and a 5-year analysis of the plans.*	a. Conduct training to address pollution reduction in stormwater runoff for MTA employees **Urban Impaired Stream (UIS) Strategy:** Information regarding MTA's two designated highest priority UIS watersheds will be incorporated into the existing education and outreach efforts continued from previous MS4 permit cycle.	Ensure MTA employees are educated and appropriately trained	Year 1:	Continue Stormwater Training Program for MTA staff	A total of **111** MTA employees were trained as part of MTA's stormwater training program, which was continued and revised to include (but not limited to): • Erosion prevention and sedimentation control, including construction and post-construction BMPs, O&M and inspection requirements; and • Information on priority UIS watersheds (e.g., Hart Brook, Goosefare Brook), as well as Long Creek (a non-UA watershed)	**Maintain stormwater training schedule, rosters, quizzes, etc.**	Environmental Services Coordinator and/or Public (Government & Community) Relations Office
			Year 2:		A total of **95** MTA employees were trained as part of MTA's stormwater training program, which was continued and revised to include (but not limited to): • Mobile refueling procedures in UA and UIS watersheds; • Additional UA identified in York and Kittery; • Development of Construction Project Environmental Compliance (CPEC) Program; • Erosion prevention and sedimentation control, including construction and post-construction BMPs, O&M and inspection requirements; and • A review of PY1 information, including MS4 permit revisions, priority UIS strategy and other UIS watershed considerations.		
			Year 3:		A total of **93** MTA employees were trained as part of MTA's annual SPCC/stormwater/ESC training program, which was continued and revised to include (but not limited to): • Erosion prevention and sedimentation control, including construction and post-construction BMPs, O&M and inspection requirements; and • A review of PY1 and PY2 information, including MS4 permit revision, priority UIS strategy and other UIS watershed considerations, CPEC Program, mobile refueling procedures in UA and UIS watersheds, and erosion prevention and sedimentation control. • Additional information on MSGP potential requirements, such as quarterly visual monitoring procedures, was also provided in a separate training session for Highway Maintenance Supervisors.		
			Year 4:	**Continue Stormwater Training Program for MTA staff**	**A total of 98 MTA employees were trained as part of MTA's annual SPCC/stormwater/ESC training program, which was continued and revised to include (but not limited to): • All aggregate changes in PY1-PY3, as detailed above; and • Revisions to MTA's IDDE policy regarding ditch / outfall inspections and mapping systems.**		
			Year 5:	Continue Stormwater Training Program for MTA staff			

Italic font: MS4 permit language
Blue font: MGs accomplished to date
Red font: UIS Strategy
Bold font: Goals achieved during current permit year

TABLE 2

STORMWATER PROGRAM MANAGEMENT PLAN (SPMP) IMPLEMENTATION SCHEDULE

Maine Turnpike Authority

MINIMUM CONTROL MEASURE #1 (MCM 1)

MPDES Permit Part IV(H) 1. Public education and outreach. *The three goals of this minimum control measure are: 1. to raise awareness that polluted stormwater runoff is the most significant source of water quality problems in Maine's waters; 2. to motivate people to use Best Management Practices (BMPs) which reduce polluted stormwater runoff; and 3. to reduce polluted stormwater runoff as a result of increased awareness and utilization of BMPs. The permittee shall document changes in awareness and BMP adoption (behavior change) in target audiences.*

MCM REQUIREMENT	BEST MANAGEMENT PRACTICES (BMPs)	METHODOLOGY/PURPOSE	MEASURABLE GOALS		ACHIEVEMENTS and COMPLETED GOALS	DOCUMENTATION	RESPONSIBLE PARTY
a. Required Strategies.							
	b. Require contractors to maintain an on-site responsible party (OSRP) who is trained in erosion and sediment control	Ensure that OSRP has the authority to promptly remedy any deficient controls	**Year 1-4:**	**Continue to obtain Erosion and Sedimentation Control (ESC) certification from contractors' OSRP**	**MTA continues to require Contractors to submit training documentation for ESC certification (e.g., as part of CPEC program, during pre-construction meetings, etc.). Standard contract documents remain in place stipulating that a qualified OSRP is on-site and authorized to remedy ESCs appropriately.**	**Maintain ESC certification documents from contractors**	Environmental Services Coordinator and/or Public (Government & Community) Relations Office
			Year 5:	Continue to obtain ESC certification from contractors' OSRP			
	c. Continue to coordinate with local groups as appropriate	Ensure that MTA continues to coordinate with the public, municipalities, MaineDOT, ISWG, etc. regarding stormwater information	Year 1-3:	Address stormwater topics at meetings and on MTA website	MTA continued to coordinate with others on important stormwater issues (including MTA's two priority UIS watersheds) by: (1) participating in the Greater Portland ISWG; (2) attending Watershed Management Planning meetings for UIS watersheds; (3) contributing to the DEP's "Think Blue" (i.e., Ducky II public service announcement) media campaign; (4) including information on stormwater in newsletters, internal and public meetings, etc.; and (5) maintaining an environmental link on the MTA website, including a link to the CCSWCD yardscape program.	**Maintain log of meetings and update of website**	
			Year 4:	**Address stormwater topics at meetings and on MTA website**	**MTA continues to coordinate with others on important stormwater issues (including MTA's two priority UIS watersheds) by: (1) participating in the Greater Portland ISWG; (2) attending Watershed Management Planning meetings for UIS watersheds; (3) including information on stormwater in newsletters, internal and public meetings, etc.; and (4) maintaining an environmental link on the MTA website, including a link to the CCSWCD yardscape program.**		
			Year 5:	Address stormwater topics at meetings and on MTA website			

Italic font: MS4 permit language
Blue font: MGs accomplished to date
Red font: UIS Strategy
Bold font: Goals achieved during current permit year

TABLE 2
STORMWATER PROGRAM MANAGEMENT PLAN (SPMP) IMPLEMENTATION SCHEDULE
Maine Turnpike Authority

MINIMUM CONTROL MEASURE #2 (MCM 2)

MPDES Permit Part IV(H) 2. Public involvement and participation. *The goal of this minimum control measure is to involve the permittee's community including various departments, bureaus 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. An active and involved participation process is crucial to the success of a stormwater management program because it allows for broader support, addition expertise and a conduit to other programs.*

MCM REQUIREMENT	BEST MANAGEMENT PRACTICES (BMPs)	METHODOLOGY/PURPOSE	MEASURABLE GOALS		ACHIEVEMENTS and COMPLETED GOALS	DOCUMENTATION	RESPONSIBLE PARTY
a. Required Strategies.							
a(i) Public notice requirements. The permittee shall comply with applicable state and local Public Notice requirements using effective mechanisms for reaching the public, and comply with the public notice requirements of the Maine Freedom of Access Act, 1 M.R.S.A. 4401 et seq. ("FOAA") when the permittee involves stakeholders in the implementation of this general permit. The permittee shall document the meetings and attendance through the annual report as a way of measuring this goal.	Ensure that appropriate public notice requirements are met when public meetings are held that address stormwater topics	Comply with applicable state and local Public Notice requirements using effective mechanisms for reaching the public, and comply with the public notice requirements of the Maine Freedom of Access Act, 1 M.R.S.A. 401 et seq. ("FOAA") when the permittee involves stakeholders in the implementation of this general permit. The permittee shall document the meetings and attendance through the annual report as a way of measuring this goal.	Year 1:	**Continue to ensure all public meetings that address stormwater meet FOAA requirements**	Public notices continued to be executed in accordance with FOAA requirements. A list of meetings, including a MTA Board Meeting on December 16, 2008 that was open to the public and included many stormwater topics, is presented as Attachment B to PY1 annual report.	**Maintain written public notice policy that complies with FOAA requirements, public notice announcements and a log of applicable meetings**	Environmental Services CoordInator and/or Public (Government and Community) Relations Office
			Year 2:		Public notices continued to be executed in accordance with FOAA requirements. A list of meetings, including a MTA Board Meeting on December 17, 2009 that was open to the public and included stormwater topics, is presented as Attachment B to PY2 annual report.		
			Year 3-4:		**Public notices continues to be executed in accordance with FOAA requirements. MTA maintains a list of meetings (open to the public and/or included stormwater topics), which isavailable upon request.**		
			Year 5:	Continue to ensure all public meetings that address stormwater meet FOAA requirements			
a(ii) Coordinate with regulated communities. The permittee shall coordinate efforts by providing information on planned activities to Regulated Small MS4 municipal stormwater coordinators. The permittee shall develop a strategy to ensure involvement, mutual cooperation and coordination with the Regulated Small MS4 municipalities, and report on such efforts annually pursuant to Part IV(J) on joint efforts, meetings attended, projects and coordination.	Coordinate with host MS4 communities, as well as MaineDOT, by sharing information on planned activities	Contact each host MS4 community to identify the respective stormwater coordinator	Year 1:	Compile list of Stormwater Coordinators for host MS4 communities	A list of Stormwater Coordinators for host MS4 communities was developed based on participation in ISWG meetings and watershed management planning efforts attended by MTA.	Maintain list of Stormwater Coordinators for each host MS4 community	Environmental Services CoordInator and/or Public (Government and Community) Relations Office
			Year 2-4:	**Communicate with host MS4 communities via the designated Stormwater Coordinator**	**MTA continues to maintain communications with host MS4 communities and their respective Stormwater Coordinators (i.e., Point of Contact) through numerous meetings.**	**Maintain documentation regarding communication and/or coordination with host MS4 communities**	
			Year 5:	Communicate with host MS4 communities via the designated Stormwater Coordinator			
		Report annually on involvement, mutual cooperation and coordination with host MS4s	Year 1:	**Develop strategy for coordinating with host MS4s and document subsequent coordination**	MTA continues to be closely involved with respect to evolving stormwater management requirements of UIS, in particular Hart Brook within UA (but also Long Creek, outside UA). Additionally, MTA participated in the DEP's "Think Blue" media campaign.	**Summarize coordination in each annual report**	
			Year 2-4:		**MTA continues to be closely involved with respect to evolving stormwater management requirements in UIS watersheds both within and outside of UA, in particular Long Creek, Capisic Brook and Red Brook in PY2, PY3 and PY4. MTA also communicates with host municipalities to stay abreast of WMP efforts in Hart Brook and Goosefare Book, MTA's two highest priority watersheds. MTA participated in DEP's "Think Blue" media campaign by contributing to the recent Ducky II public service announcement media campaign in PY2 and PY3, and provides a link from MTA's website to CCSWCD's yardscape program.**		
			Year 5:	Develop strategy for coordinating with host MS4s and document subsequent			

Italic font: MS4 permit language
Blue font: MGs accomplished to date
Red font: UIS Strategy
Bold font: Goals achieved during current permit year

TABLE 2
STORMWATER PROGRAM MANAGEMENT PLAN (SPMP) IMPLEMENTATION SCHEDULE
Maine Turnpike Authority

MINIMUM CONTROL MEASURE #3 (MCM 3)

MPDES Permit Part IV(H) 3. Illicit Discharge Detection and Elimination (IDDE). *Each permittee must develop, implement and enforce a program to detect and eliminate illicit discharges and non-stormwater discharges, as defined in 06-096CMR521(9)(b)(2), except as provided in Part IV(H)3(b) of this permit.*

MCM REQUIREMENT	BEST MANAGEMENT PRACTICES (BMPs)	METHODOLOGY/PURPOSE	MEASURABLE GOALS		ACHIEVEMENTS and COMPLETED GOALS	DOCUMENTATION	RESPONSIBLE PARTY
a. Required Strategies.							
a(i) By June 30, 2013,, each permittee shall develop a watershed-based storm sewer system infrastructure map of its respective MS4 within the UA showing all stormwater catch basins, connecting surface and subsurface infrastructure depicting the direction of in-flow and out-flow pipes, and the locations of all discharges from all outfalls operated by the permittee.	Develop watershed-based Storm Sewer System Infrastructure Maps for MTA Facility within UA **Urban Impaired Stream (UIS) Strategy:** Priority will be given to mapping of UIS watersheds within UA. For example, the MGs listed for PY1 through PY5 will be conducted in PY1 for CBs and	*Each catch basin must be uniquely identified:* *-to facilitate control of potential illicit discharges,* *-to ensure proper operation and maintenance of the structures, and* *For each outfall, the following information must be included:* *-type, material, and size of conveyance;* *-outfall or channelized flow;* *-the name and location of the immediate surface waterbody or wetland to which the stormwater runoff discharges.* *If an outfall does not discharge directly to a named waterbody, identify the name and location of the nearest named waterbody to which the outfall eventually discharges.*	Year 1:	Review existing MS4 maps that were compiled as part of the previous MS4 permit	MTA maintains existing MS4 maps which were completed as part of previous MS4 permit. These maps were developed using 2000 Census data which is a requirement of the current MS4 permit.	Maintain inventory of maps for portions of MTA facility within UA	Environmental Services Coordinator and/or Designated Consultant
				Identify potential updates to UA maps that must be made to meet these new IDDE requirements before June 2013	No potential updates to UA maps were identified during PY1. When MTA's MS4 maps and associated database were created, the specific information required (i.e., unique identifier, type/size of conveyance, immediate surface waterbody, etc.) was collected and is maintained in the database.	Maintain punchlist of potential upgrades to maps	
			Year 2:	Ensure that maps include all CBs and subsurface infrastructure depicting flow directions	MTA already maintains MS4 mapping to include flow arrows depicting the flow directions between all MTA stormwater infrastructure. MTA also continues to maintain a comprehensive stormwater database that stores construction information for MTA outfalls located within UA. In PY 2, additional UA was identified in York and Kittery. The stormwater infrastructure (i.e. CBs and OFs) were indentified, mapped and added to the existing database.	Maintain updated maps that include: - uniquely identified CBs and assoc. surfaces - flow directions - outfall description (e.g., type, material, size)	
				Ensure that maps include details pertaining to construction of each outfall			
			Year 3:	Revise maps to include connecting surface associated with CBs	MTA already maintains MS4 mapping to include connecting surface associated with all MTA stormwater infrastructure. MTA already maintains MS4 mapping to include the name and location of immediate surface waterbody or wetland to which each outfall discharges. MTA also continues to maintain a comprehensive stormwater database that stores surface waterbody or wetland information for MTA outfalls located within UA.	**Maintain updated maps that include additions from Year 2, plus the following:** **- connecting surfaces associated with CBs** **- receiving waterbodies for each outfall**	
				Revise maps to include the name and location of immediate surface waterbody or wetland to which each outfall discharges			
			Year 4:	**Revise maps to identify receiving waters for outfalls that do not directly discharge to a named waterbody**	**MTA continues to update existing MS4 maps, which includes beginning to identify all receiving waters for outfalls that do not directly discharge to a named waterbody, and the conversion of existing MS4 maps to maps utilizing ArcGIS (ESRI).**		
			Year 5:	Revise maps to identify receiving waters for outfalls that do not directly discharge to a named waterbody			
a(ii) Each permittee shall develop and implement a prioritized dry weather outfall inspection plan based on drainage areas such as an urban impaired stream watershed, or based on a watershed or sub-watershed that the permittee has identified as having the greatest potential threat to the receiving water.	Develop prioritized dry weather inspection program **Urban Impaired Stream (UIS) Strategy:** Priority will be given in Year 1 to conducting dry weather inspections of outfalls that discharge to MTA's two highest priority watersheds. Although not located within UA, MTA will expand dry weather inspection of outfalls to include MTA right-of-way (ROW) that intersects with the Long Creek watershed.	*Develop a defined standard operating procedure (SOP), procedure and policy for identifying illicit discharges during dry weather inspections and the detailed steps to locate and eliminate the source*	Year 1:	Review, develop and/or update the SOP, policy and protocol for identifying illicit discharges during dry weather inspections	MTA's IDDE SOP was reviewed and is being updated to ensure that the SOP is compliant with new MS4 permit requirements.	Retain written notification policy for consistently reporting suspected illicit discharges internally and externally	Environmental Services Coordinator and/or Designee
			Year 2-4:	**Implement a defined SOP with detailed steps that must be taken to locate and eliminate the source of an illicit discharge when it is identified during these inspections**	**MTA continues to maintain an effective SOP for identifying illicit discharges during dry weather inspections that is periodically reviewed for effectiveness.**	**Retain written notification policy for consistently reporting suspected illicit discharges internally and externally.** **Maintain source location determinations, as well as corrective actions taken to eliminate the illicit connection/discharge**	
			Year 5:	Implement a defined SOP with detailed steps that must be taken to locate and eliminate the source of an illicit discharge when it is identified during these inspections			
		Conduct dry weather inspection of outfalls within UIS watersheds in UA	Year 1:	Conduct a dry weather inspection of outfalls that discharge to the two highest priority watersheds (e.g., Hart Brook and Goosefare Brook)	**Dry weather inspections of outfalls that discharge to the two highest priority watersheds (Hart Brook and Goosefare Brook) and other UIS within UA were conducted by MTA during PY1, PY2, PY3 and continued in PY4.** **In PY3 and PY4, MTA has continued to conduct dry weather inspections of most outfalls within UA, plus those within the Long Creek, Red Brook, and Capisic Brook watersheds outside of UA. Outfalls within UA in the York territory were not able to be inspected due to construction in the area.**	**Document dry weather inspections within UIS watersheds**	Environmental Services Coordinator and/or Highway Maintenance Supervisor
			Year 2-4:	**Expand the dry weather inspection of outfalls to include any remaining UIS within UA**			

Italic font: MS4 permit language
Blue font: MGs accomplished to date
Red font: UIS Strategy
Bold font: Goals achieved during current permit year

TABLE 2

STORMWATER PROGRAM MANAGEMENT PLAN (SPMP) IMPLEMENTATION SCHEDULE

Maine Turnpike Authority

MINIMUM CONTROL MEASURE #3 (MCM 3)

MPDES Permit Part IV(H) 3. Illicit Discharge Detection and Elimination (IDDE). *Each permittee must develop, implement and enforce a program to detect and eliminate illicit discharges and non-stormwater discharges, as defined in 06-096CMR521(9)(b)(2), except as provided in Part IV(H)3(b) of this permit.*

MCM REQUIREMENT	BEST MANAGEMENT PRACTICES (BMPs)	METHODOLOGY/PURPOSE	MEASURABLE GOALS		ACHIEVEMENTS and COMPLETED GOALS	DOCUMENTATION	RESPONSIBLE PARTY
a. Required Strategies.							
			Year 5:	Continue to expand the dry weather inspection of outfalls to include any remaining UIS within UA			Environmental Services Coordinator and/or Highway Maintenance Supervisor
a(iii) By the end of permit year five, to the extent allowable under State or local law, MaineDOT/MTA shall develop and implement a strategy to detect any illicit discharges to their open ditch system within their two highest priority watersheds.	Establish a strategy for addressing illicit discharges to open ditch systems within two highest priority watersheds (e.g., Hart Brook and Goosefare Brook)	Utilize **existing mechanisms** (e.g., IDDE Notification Form, Mobile SPCC Plan Spill Reporting, Highway Safety Incident Response, Annual Comprehensive Inspection conducted by construction contractor) to provide consistent protocol for internal reporting through an established chain-of-command, which establishes a central point of contact for MTA to notify state and municipal enforcement authorities	Year 1:	Review for potential revisions to existing mechanisms to document any detected illicit discharges in open ditch system	MTA's Spill Report Form was updated to include illicit discharge detection information. Other existing mechanisms were evaluated during Permit Year 1 and will continue to be considered to ensure illicit discharges are eliminated from open ditch systems within UA.	**Maintain source location determinations, as well as corrective actions taken to eliminate the illicit connection/discharge**	Environmental Services Coordinator and/or Designated Consultant
			Year 2:	Implement revisions to document illicit discharges detected in open ditch system within MTA's two highest priority watersheds, as necessary	MTA's IDDE SOP was reviewed in PY2 and PY3 to ensure that illicit discharge detection in open ditch systems will be implemented appropriately, not only in MTA's two highest priority UIS watersheds, but within MTA's UA. Since MTA's highway maintenance personnel routinely inspect open ditch systems during mowing, brush clearing and other routine operations, they have been trained (annually since 2004) to report discharges "that do not consist entirely of stormwater" to MTA's Environmental Services Coordinator.		
			Year 3:	Continue to document illicit discharges detected in open ditch system within MTA's two highest priority watersheds, as necessary			
			Year 4:	**Continue to document illicit discharges detected in open ditch system within MTA's two highest priority watersheds, as necessary**	**In PY4 MTA's IDDE SOP was reviewed and updated to ensure that illicit discharge detection in open ditch systems will be implemented appropriately, not only in MTA's two highest priority UIS watersheds, but within MTA's UA.** **Since MTA's highway maintenance personnel routinely inspect open ditch systems during mowing, brush clearing and other routine operations, they have been trained (annually since 2004) to report discharges "that do not consist entirely of stormwater" to MTA's Environmental Services Coordinator.**		
			Year 5:	Continue to document illicit discharges detected in open ditch system within MTA's two highest priority watersheds, as necessary			
b. This permit authorizes non-stormwater discharges provided they do not contribute to a violation of water quality standards, as determined by the Department; these discharges must be addressed in the Plan if they are identified by the permittee as significant contributors of pollutants to the regulated small MS4.	Modify this Plan, as necessary, to address non-stormwater discharges that are identified as significant contributors of pollutants to the MS4	Ensure that this SPMP addresses identified non-stormwater discharges that are considered significant contributors of pollutants to the regulated MS4	**Year 1-4:**	**Identify and document non-stormwater discharges as they are discovered during dry weather inspections, mapping, etc.**	**No non-stormwater discharges have been discovered during PY1, PY2, PY3 or PY4.** **MTA maintains a log of spills along MTA's right-of-way, including spills within UA. All spills are properly documented and remediated to avoid impacts to stormwater discharges and to eliminate the potential for contributing to an illicit discharge. *Please refer to text on MCM3 for more information on spills within MTA's UA.***	**Maintain log of identified non-stormwater discharges that potentially contribute to a violation of water quality standards**	Environmental Services Coordinator and/or Designated Consultant
				Revise the SPMP and this implementation schedule as necessary	**No non-stormwater discharges have been discovered during PY1, PY2, PY3 or PY4; therefore, no revisions to the SPMP are necessary at this time**		
			Year 5:	Identify and document non-stormwater discharges as they are discovered during dry weather inspections, mapping, etc.			
				Revise the SPMP and this implementation schedule as necessary			

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MINIMUM CONTROL MEASURE #4 (MCM 4)

MPDES Permit Part IV(H) 4. Construction site runoff control. *Develop, implement and enforce a program or modify an existing program, to reduce pollutants in any stormwater runoff from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of stormwater discharges from construction activity disturbing less than one acre must be included in the program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. Each permittee must include standard operating procedures for addressing and implementing compliance and enforcement actions.*

MCM REQUIREMENT	BEST MANAGEMENT PRACTICES (BMPs)	METHODOLOGY/PURPOSE	MEASURABLE GOALS		ACHIEVEMENTS and COMPLETED GOALS	DOCUMENTATION	RESPONSIBLE PARTY
a. Required Strategies.							
The program will include, but not be limited to, the development and implementation of the Memorandum of Agreement (MOA) between MDEP, MTA and MDOT.	Develop and implement MEPDES MOA that establishes a program to reduce pollutants in stormwater runoff from construction activities at regulated projects. **UIS Strategy:** Additional BMPs in the two highest priority UIS watersheds will be addressed in the proposed MOA.	Development of a MEPDES MOA will provide permit coverage to MTA and MaineDOT associated with the duplicative requirements of the three MEPDES programs: MS4 GP, MCGP and MSGP. The proposed MOA will be reasonably consistent with the standards established by the DEP in MCMs #4 through #6 of this MS4 General Permit (GP), as well as the Maine Construction General Permit (MCGP) and DEP's Multi-Sector General Permit (MSGP).	Year 1:	Develop MEPDES MOA with DEP in a coordinated effort with MaineDOT	MTA implemented Erosion and Sedimentation Control (ESC) practices, including daily construction inspection requirements and BMPs at all MTA sites (even those less than one acre - in accordance with Chapter 500 MOA). Through binding contract language, MTA continues to require contractors (1) to comply with Chapter 500 standards for all projects; and (2) to provide NPS training certification for each OSRP.	Maintain documentation associated with MOA development process with DEP	Environmental Services Coordinator and/or Designee
			Year 2:	Finalize MEPDES MOA and identify specific requirements	Although no MEPDES MOA was developed or adopted in PY2, MTA continued to implement the measures described above in PY1. MTA also implemented a new environmental compliance program to ensure all stormwater related activities and other environmental regulatory considerations are documented in a singular binder for all construction projects completed by Contractors for MTA. The compliance program, known as the Construction Project Environmental Compliance (CPEC) program, separates all construction projects into three phases (i.e., Project Development, Construction, and Post-Construction) and identifies applicable requirements and activities for each project undertaken by MTA. The program provides a mechanism for ensuring that stormwater requirements and other environmental regulatory obligations are considered and appropriate actions are taken for reducing pollutants in stormwater runoff from construction activities at regulated projects.	Maintain a CPEC Program binder for each project to demonstrate compliance and to document MTA's efforts to reduce pollutants in stormwater runoff from construction activities	
			Year 3-4:	**Implement MEPDES MOA and prepare annual MOA report**	**Although no MEPDES MOA was developed or adopted in PY3, MTA continues to implement and maintain the measures described above in PY1 and PY2.**	**Maintain records for projects to be included in annual MOA report and associated records.** **Maintain a CPEC Program binder for each project to demonstrate compliance and to document MTA's efforts to reduce pollutants in stormwater runoff from construction activities**	
			Year 5:	Implement MEPDES MOA and prepare annual MOA report			

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TABLE 2
STORMWATER PROGRAM MANAGEMENT PLAN (SPMP) IMPLEMENTATION SCHEDULE
Maine Turnpike Authority

MINIMUM CONTROL MEASURE #5 (MCM 5)

MPDES Permit Part IV(H) 5. Post-construction stormwater management in new development and redevelopment.

MCM REQUIREMENT	BEST MANAGEMENT PRACTICES (BMPs)	METHODOLOGY/PURPOSE	MEASURABLE GOALS		ACHIEVEMENTS and COMPLETED GOALS	DOCUMENTATION	RESPONSIBLE PARTY
a. Required Strategies.							
(i) Each permittee shall develop, implement, and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge directly to waters of the State other than groundwater.	Develop and implement MEPDES MOA that establishes a program for new development and redevelopment that addresses stormwater runoff from projects that disturb one acre or more discharging directly to waters of the State. *This program must ensure that controls are in place that are designed to prevent or minimize water quality impacts.*	Development of a MEPDES MOA will provide permit coverage to MTA and MaineDOT associated with the duplicative requirements of the three MEPDES programs: MS4 GP, MCGP and MSGP. The proposed MOA will be reasonably consistent with the standards established by the DEP in MCMs #4 through #6 of this MS4 General Permit (GP), as well as the Maine Construction General Permit (MCGP) and DEP's Multi-Sector General Permit (MSGP).	Year 1:	Develop MEPDES MOA with DEP in a coordinated effort with MaineDOT	Although a MEPDES MOA was not developed with DEP, MTA continues to address stormwater runoff from new development and redevelopment projects of all sizes, within UA and throughout MTA's ROW. However, there were no projects identified in Permit Year 1 that "discharge directly to waters of the State."	Maintain documentation associated with MOA development process with DEP	Environmental Services Coordinator and/or Designee
			Year 2:	Finalize MEPDES MOA and identify specific requirements	Although a MEPDES MOA was not developed with DEP, MTA implemented a new environmental compliance program for new development and redevelopment that addresses stormwater runoff from all MTA projects, both during construction and post-construction. This program, known as the CPEC Program, was designed to ensure that appropriate controls are in place during all phases of construction to prevent or minimize water quality impacts from stormwater runoff.	Maintain a CPEC Program binder for each project to demonstrate compliance and to document MTA's efforts to minimize water quality impacts	
			Year 3-4:	**Implement MEPDES MOA and prepare annual MOA report**	**Although no MEPDES MOA was developed or adopted, MTA continues to implement the measures described above in PY2 to address stormwater runoff from new development and redevelopment projects of all sizes.**	**Maintain records for projects to be included in annual MOA report and associated records**	
			Year 5:	Implement MEPDES MOA and prepare annual MOA report			
(ii) Each permittee shall develop and implement strategies that include a combination of structural and/or non-structural best management practices (BMPs) appropriate for its regulated small MS4.	Develop and implement MEPDES MOA that addresses strategies that include appropriate structural and non-structural BMPs.		Year 1:	Develop MEPDES MOA with DEP in a coordinated effort with MaineDOT	MTA continues to train employees internally to identify appropriate strategies that include both structural and non-structural BMPs, as well as rely on design engineers to meet Chapter 500 standards	Maintain documentation associated with MOA development process with DEP	Environmental Services Coordinator and/or Designee
			Year 2:	Finalize MEPDES MOA and identify specific requirements	In addition to continuing the efforts described above in PY1, the CPEC program was developed in PY2 to address strategies that incorporate appropriate structural and non-structural BMPs into MTA projects.	Maintain a CPEC Program binder for each project to identify structural and non-structural BMPs to be maintained	
			Year 3-4:	**Implement MEPDES MOA and prepare annual MOA report**	**Although no MEPDES MOA was developed or adopted, MTA continues to implement the measures described above in PY1 and PY2 to address strategies that incorporate appropriate structural and non-structural BMPs into MTA projects.**	**Maintain records for projects to be included in annual MOA report and associated records**	
			Year 5:	Implement MEPDES MOA and prepare annual MOA report			
(iii) To ensure adequate long-term operation and maintenance of post construction BMPs, each permittee shall develop, as part of its Stormwater Program Management Plan, an approved BMP inspection schedule that at a minimum stipulates that new BMPs are inspected at least once during the first year of installation.	Develop and implement MEPDES MOA that includes guidelines for post-construction BMPs inspections. *Post construction BMP inspections must determine if the BMP is adequately maintained and is functioning as intended or requires maintenance. If the post construction BMP requires maintenance, provide a record of the deficiency and corrective action(s) taken.*	*Each permittee shall include the following in their annual report:* *-the cumulative number of post construction BMPs discharging directly into waters of the State other than groundwater or into their separate storm sewer system;* *-the number of sites with documented functioning post construction BMPs; and* *-the number of sites requiring routine maintenance or remedial action to ensure that the post construction BMP is functioning as intended.*	Year 1:	Develop MEPDES MOA with DEP in a coordinated effort with MaineDOT	MTA has developed an O&M schedule that incorporates annual inspection requirements for all newly installed structural BMPs. • No significant projects with BMPs were identified within UA in PY1 (even newly constructed MTA Headquarters is located outside UA). • Therefore, no development/redevelopment sites within UA were identified as discharging directly into waters of the State in PY1. • Although no sites were located within UA and/or identified during PY1, MTA continues to monitor ROW for existing BMPs that require maintenance to ensure that they function as intended.	Maintain documentation associated with MOA development process with DEP	Environmental Services Coordinator and/or Designee
			Year 2:	Finalize MEPDES MOA and identify specific requirements	MTA continues to implement the O&M schedule described above in PY1 for newly installed BMPs. The CPEC program incorporates post-construction BMPs, as well as inspections and other O&M considerations, for all projects undertaken by MTA. The CPEC program provides a mechanism for ensuring that records are maintained on all inspections, maintenance activities, and corrective action(s) for new projects starting in PY3.	Maintain a copy of the established MEPDES MOA	
			Year 3-4:	**Implement MEPDES MOA and prepare annual MOA report**	**In PY3, MTA adopted and implemented a SOP for Post-Construction Activities to ensure BMPs, inspections, and other O&M considerations have been incorporated for all projects undertaken by MTA.** **MTA also continues to implement the O&M schedule described above in PY1 for newly installed BMPs. MTA also continues to implement the CPEC program described above in PY2 for all construction projects.**	**Maintain records for projects to be included in annual MOA report and associated records**	
			Year 5:	Implement MEPDES MOA and prepare annual MOA report			

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TABLE 2
STORMWATER PROGRAM MANAGEMENT PLAN (SPMP) IMPLEMENTATION SCHEDULE
Maine Turnpike Authority

MINIMUM CONTROL MEASURE #6 (MCM 6)

MPDES Permit Part IV(H) 6. Pollution prevention (P2)/good housekeeping in community/facility operations. *This MCM has the ultimate goal of preventing or reducing pollutant runoff from MaineDOT's/MTA's roads, other paved surfaces, infrastructure, and facilities through the development and implementation of an operation and maintenance (O&M) program. The O&M program must include the following:*

MCM REQUIREMENT	BEST MANAGEMENT PRACTICES (BMPs)	METHODOLOGY/PURPOSE	MEASURABLE GOALS		ACHIEVEMENTS and COMPLETED GOALS	DOCUMENTATION	RESPONSIBLE PARTY
a. Required Strategies.							
(i) By the end of permit year one, each permittee shall develop an inventory of potential pollutant sources and associated operations conducted in, on or associated with facilities, buildings, roads, travel ways including right-of-way owned or operated by the permittee that have the potential to cause or contribute to stormwater or surface water pollution. By the end of permit year two, the permittee shall develop written operation and maintenance procedures that include maintenance schedules and inspection procedures to ensure long term operation of structural and non-structural controls and reduce stormwater pollution to the maximum extent possible.	Develop and implement MEPDES MOA that includes an O&M Plan that addresses potential pollutant sources and O&M procedures, such as: (1) proper use, storage and disposal of petroleum and non petroleum products, hazardous materials, waste materials, pesticides and fertilizers including minimizing the use of these products, and an alternative product analysis; (2) spill response and prevention; (3) vehicle and equipment storage, maintenance and fueling; (4) landscaping and lawn care including, where applicable and not subject to other federal regulations, an evaluation of reduced mowing frequencies, establishing and maintaining buffers, cutting vegetation within 100 feet of a stormwater conveyance or surface water; (5) erosion and sedimentation control; and (6) disposal of road-killed wildlife.	Development of a MEPDES MOA will provide permit coverage to MTA and MaineDOT associated with the duplicative requirements of the three MEPDES programs: MS4 GP, MCGP and MSGP. The proposed MOA will be reasonably consistent with the standards established by the DEP in MCMs #4 through #6 of this MS4 General Permit (GP), as well as the Maine Construction General Permit (MCGP) and DEP's Multi-Sector General Permit (MSGP).	Year 1:	Develop MEPDES MOA with DEP in a coordinated effort with MaineDOT	MTA developed and implemented an O&M schedule for newly installed BMPs located throughout MTA's ROW, not just within UA, during Permit Year 1. MTA does not operate any of these newly installed BMPs and/or Maintenance Garages within UA. Furthermore, MTA does not anticipate that petroleum and/or non-petroleum products (e.g., potential pollutant sources) to be stored, used or disposed of within UA areas. However, MTA already maintains the following policies, procedures and plans: (1) Spill Prevention, Control and Countermeasures (SPCC) Plans with integrated Stormwater Pollution Prevention Measures for all MTA Highway/Equipment Maintenance Garages that address the proper use, storage and disposal of petroleum products, as well as non-petroleum products and other hazardous materials; (2) Spill response and prevention measures have been established at these facilities in the SPCC Plans, as well as in MTA's Mobile SPCC Plan that is implemented throughout all MTA ROW; (3) The integrated stormwater pollution prevention measures incorporated in these Plans address vehicle and equipment storage practices, maintenance and refueling; (4) Post-construction requirements for newly installed structural BMPs, including an O&M schedule for mowing and inspections in accordance with applicable Chapter 500 requirements, were developed during Permit Year 1; (5) Construction and post-construction inspection requirements have been implemented for all projects (even those less than 1 acre) have been implemented in accordance with the Chapter 500 MOA; and (6) Road-killed wildlife policy.	Maintain documentation associated with the O&M schedule and other existing documents relevant to implementing MCM 6	Environmental Services Coordinator and/or Designee
			Year 2:	Finalize MEPDES MOA and identify specific requirements	In addition to the continued practices described above in PY1, MTA also implemented the new CPEC program to ensure appropriate documentation of these MTA policies, procedures, and plans are maintained in a centralized location for new projects.	Maintain a copy of the established MEPDES MOA	
			Year 3-4:	**Implement MEPDES MOA and prepare annual MOA report**	**MTA continues to implement the practices described above in PY1 and PY3.**	**Maintain records for projects to be included in annual MOA report and associated records**	
			Year 5:	Implement MEPDES MOA and prepare annual MOA report			
(ii) Using training materials that are available from the EPA, the State, regional stormwater groups or other organizations, Guidelines and Standard Operating Procedures for Stormwater Phase II Communities in Maine volumes 1 and 2, and the ThinkBlueMaine website, this program must include employee training to prevent and reduce stormwater pollution from permittee operations and facilities. The permittee shall report annually on the types of training presented, the number of employees and contractors that received training, the length of the training and training effectiveness.	Develop Stormwater Pollution Reduction Training Program for contractors and MTA employees **UIS Strategy:** Revise Stormwater Training Program to include additional information pertaining to UIS watersheds and additional BMPs	The existing training programs conducted for MTA employees will be reviewed and updated, as necessary, to include additional information pertaining to stormwater pollution prevention and ESC BMPs from the resources detailed in the GP. Because MTA does not conduct training for contractors, MTA will rely on contractors to become certified through the DEP's Non-Point Source Training Center or an equivalent program. Contractors will provide proof of certification to MTA as part of the Training Program	Year 1:	Conduct existing training program that addresses stormwater pollution prevention, as well as erosion and sediment control	As previously detailed in MCM 1, MTA's SPCC training program was conducted in May and June 2009 and included stormwater pollution prevention, as well as erosion and sediment controls, construction and post-construction inspections and BMP requirements.	See MCM #1	See MCM #1
				Revise existing training program to incorporate additional information from resources identified in GP	Training program was revised to include information and resources identified in the GP.		
				Review current files to ensure that contractors are certified by DEP in stormwater pollution prevention, as well as erosion and sediment control	MTA continues to rely on the DEP's NPS Training Program to certify contractors; but MTA obtains ESC certification from all contractor's OSRPs.		
				Include the required training information in the annual report	Completed training documentation is included as part of the PY1 Annual Report.		
			Year 2:	Continue training program and annual reporting	As previously detailed in MCM 1, MTA's SPCC/Stormwater training program was conducted in May and June 2010 and included stormwater pollution prevention, as well as erosion and sediment control practices, construction and post-construction inspections and BMP requirements. Revisions to the SPCC/Stormwater training program are summarized in MCM 1.	See MCM #1	See MCM #1
			Year 3:	Continue training program and annual reporting	As previously detailed in MCM 1, MTA's SPCC/Stormwater training program was conducted in May to August 2011 and included stormwater pollution prevention, as well as erosion and sediment control practices, construction and post-construction inspections and BMP requirements. Revisions to the SPCC/Stormwater training program are summarized in MCM 1.		

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TABLE 2

STORMWATER PROGRAM MANAGEMENT PLAN (SPMP) IMPLEMENTATION SCHEDULE

Maine Turnpike Authority

MINIMUM CONTROL MEASURE #6 (MCM 6)

MPDES Permit Part IV(H) 6. Pollution prevention (P2)/good housekeeping in community/facility operations. *This MCM has the ultimate goal of preventing or reducing pollutant runoff from MaineDOT's/MTA's roads, other paved surfaces, infrastructure, and facilities through the development and implementation of an operation and maintenance (O&M) program. The O&M program must include the following:*

MCM REQUIREMENT	BEST MANAGEMENT PRACTICES (BMPs)	METHODOLOGY/PURPOSE	MEASURABLE GOALS		ACHIEVEMENTS and COMPLETED GOALS	DOCUMENTATION	RESPONSIBLE PARTY
a. Required Strategies.							
			Year 4:	**Continue training program and annual reporting**	**As previously detailed in MCM 1, MTA's SPCC/Stormwater training program was conducted in May and June 2012 and included stormwater pollution prevention, as well as erosion and sediment control practices, construction and post-construction inspections and BMP requirements.** **Revisions to the SPCC/Stormwater and ESC training program are summarized in MCM 1.**	**See MCM #1**	
			Year 5:	Continue training program and annual reporting			
(iii) Each permittee shall develop and implement a program to sweep all paved streets and parking lots maintained by the permittee at least once a year as soon as possible after snowmelt.	Develop and implement MEPDES MOA that includes an O&M Plan that addresses sweeping of paved surfaces	Development of a MEPDES MOA will provide permit coverage to MTA and MaineDOT associated with the duplicative requirements of the three MEPDES programs: MS4 GP, MCGP and MSGP. The proposed MOA will be reasonably consistent with the standards established by the DEP in MCMs #4 through #6 of this MS4 General Permit (GP), as well as the Maine Construction General Permit (MCGP) and DEP's Multi-Sector General Permit (MSGP).	Year 1:	Develop MEPDES MOA with DEP in a coordinated effort with MaineDOT	**Although a MEPDES MOA was not developed, MTA continues to implement the existing annual sweeping program for the mainline and associated areas.**	Maintain documentation associated with MOA development process with DEP	Environmental Services Coordinator and/or Designated Consultant
			Year 2:	Finalize MEPDES MOA and identify specific requirements		Maintain a log of sweeping activities (provided to DEP in Annual MOA Report)	
			Year 3-4:	**Implement MEPDES MOA and prepare annual MOA report**		**Maintain records for projects to be included in annual MOA report and associated records**	
			Year 5:	Implement MEPDES MOA and prepare annual MOA report			
	Continue existing annual sweeping program established under previous MS4 permit cycle **UIS Strategy:** Priority will be given to sweeping within two highest priority UIS watersheds as soon as possible after snowmelt.		Year 1-4:	**Continue to implement MTA's existing annual sweeping program**	**MTA continues to conduct sweeping within all UA with priority given to sweeping within UIS watersheds (Hart Book and Goosefare Brook) as soon as possible after snow melt.**	Maintain a copy of a memo regarding prioritized sweeping efforts from Director of Highway Maintenance	Highway Maintenance staff
			Year 5:	Continue to implement MTA's existing annual sweeping program		**Maintain O&M documents for sweeping program**	
(iv) The permittee shall develop and implement a program to evaluate and, if necessary, clean catch basins and other stormwater structures that accumulate sediment at least once every other year and dispose of the removed sediments in accordance with current state law.	Develop and implement MEPDES MOA that includes an O&M Plan that addresses CB inspections and cleanouts **UIS Strategy:** Priority will be given to cleaning out catch basins within two highest priority UIS watersheds before others within UA.	Development of a MEPDES MOA will provide permit coverage to MTA and MaineDOT associated with the duplicative requirements of the three MEPDES programs: MS4 GP, MCGP and MSGP. The proposed MOA will be reasonably consistent with the standards established by the DEP in MCMs #4 through #6 of this MS4 General Permit (GP), as well as the Maine Construction General Permit (MCGP) and DEP's Multi-Sector General Permit (MSGP).	Year 1:	Develop MEPDES MOA with DEP in a coordinated effort with MaineDOT	**MTA continues to clean out catch basins of accumulated sediments and debris on an annual basis. Removed sediments are disposed of in accordance with an existing Memorandum of Understanding (MOU) with DEP.**	Maintain documentation associated with MOA development process with DEP	Environmental Services Coordinator and/or Designated Consultant
			Year 2:	Finalize MEPDES MOA and identify specific requirements		Maintain documentation relative to sediment removal and disposal	
			Year 3-4:	**Implement MEPDES MOA and prepare annual MOA report**		**Maintain records for projects to be included in annual MOA report and associated records**	
			Year 5:	Implement MEPDES MOA and prepare annual MOA report			
	Continue existing annual catch basin cleanout program established under previous MS4 cycle		Year 1-4:	**Continue to implement MTA's existing annual catch basin cleanout program**	**MTA continues to clean out catch basins and IDDE inspection, and maintain cleanout logs at each MTA highway maintenance facility.**	Maintain O&M documents for catch basin cleanout program	Highway Maintenance staff
			Year 5:	Continue to implement MTA's existing annual catch basin cleanout program			
(v) The permittee shall evaluate and implement a prioritized schedule, as necessary, for repairing or upgrading conveyances, structures and outfalls of the regulated small MS4.	Develop and implement MEPDES MOA that includes an O&M Plan that includes a prioritized schedule for repairing and upgrading MS4 associated infrastructure. **UIS Strategy:** Priority will be given to cleaning out catch basins within two highest priority UIS watersheds before others within UA.	Development of a MEPDES MOA will provide permit coverage to MTA and MaineDOT associated with the duplicative requirements of the three MEPDES programs: MS4 GP, MCGP and MSGP. The proposed MOA will be reasonably consistent with the standards established by the DEP in MCMs #4 through #6 of this MS4 General Permit (GP), as well as the Maine Construction General Permit (MCGP) and DEP's Multi-Sector General Permit (MSGP).	Year 1:	Develop MEPDES MOA with DEP in a coordinated effort with MaineDOT	**As part of the annual MS4 inspection and cleanout program already developed by MTA, any potential repairs are identified thus triggering the required repair, as needed. Furthermore, MTA's retains a construction contractor who conducts an annual inspection of MTA ROW and identifies necessary upgrades to conveyances not only in UA, but throughout all of MTA's ROW.**	**Maintain documentation associated with annual inspection programs conducted by MTA Highway Maintenance and hired construction contractor**	Environmental Services Coordinator and/or Designated Consultant
			Year 2:	Finalize MEPDES MOA and identify specific requirements			
			Year 3-4:	**Implement MEPDES MOA and prepare annual MOA report**			
			Year 5:	Implement MEPDES MOA and prepare annual MOA report			

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TABLE 2
STORMWATER PROGRAM MANAGEMENT PLAN (SPMP) IMPLEMENTATION SCHEDULE
Maine Turnpike Authority

MINIMUM CONTROL MEASURE #6 (MCM 6)

MPDES Permit Part IV(H) 6. Pollution prevention (P2)/good housekeeping in community/facility operations. *This MCM has the ultimate goal of preventing or reducing pollutant runoff from MaineDOT's/MTA's roads, other paved surfaces, infrastructure, and facilities through the development and implementation of an operation and maintenance (O&M) program. The O&M program must include the following:*

MCM REQUIREMENT	BEST MANAGEMENT PRACTICES (BMPs)	METHODOLOGY/PURPOSE	MEASURABLE GOALS		ACHIEVEMENTS and COMPLETED GOALS	DOCUMENTATION	RESPONSIBLE PARTY
a. Required Strategies.							
	Continue existing annual comprehensive inspection of MTA infrastructure and operations conducted by construction contractor **UIS Strategy:** Additional information will be provided in the inspection report regarding conveyances, outfalls, etc. in the two highest priority watersheds		Year 1-4:	**Continue to implement MTA's existing annual comprehensive inspection program of all infrastructure/ operations**	**MTA's hired construction contractor continues to conduct an annual inspection of the MTA ROW, which is supplemented by dry weather inspections conducted by MTA's Highway Maintenance and/or Engineering departments.**	**Maintain annual inspection report(s) with recommendations for upgrades and repairs**	MTA Engineering Staff and/or Designee
			Year 5:	Continue to implement MTA's existing annual comprehensive inspection program of all infrastructure/operations			MTA Engineering Staff and/or Designee
(vi) By the end of permit year two, the permittee shall develop and implement a stormwater pollution prevention plan ("SWPPP") for vehicle maintenance facilities operated by the permittee within the UA unless the facility is currently regulated under Maine's Industrial Stormwater Program.	Develop and implement MEPDES MOA that includes an O&M Plan that addresses SWPPP requirements for vehicle maintenance facilities within UA **UIS Strategy:** Priority will be given to cleaning out catch basins within two highest priority UIS watersheds before others within UA.	Development of a MEPDES MOA will provide permit coverage to MTA and MaineDOT associated with the duplicative requirements of the three MEPDES programs: MS4 GP, MCGP and MSGP. The proposed MOA will be reasonably consistent with the standards established by the DEP in MCMs #4 through #6 of this MS4 General Permit (GP), as well as the Maine Construction General Permit (MCGP) and DEP's Multi-Sector General Permit (MSGP).	Year 1:	Develop MEPDES MOA with DEP in a coordinated effort with MaineDOT	Other than the proposed development of a MEPDES MOA with DEP, no action is required until Permit Year 2.	Maintain documentation associated with MOA development process with DEP	Environmental Services Coordinator and/or Designated Consultant
			Year 2:	Finalize MEPDES MOA and identify specific requirements	MTA does not operate any vehicle maintenance facilities within UA	No documentation needed	
			Year 3-4:	**Implement MEPDES MOA and prepare annual MOA report**	**MTA does not operate any vehicle maintenance facilities within UA**	**Maintain records for projects to be included in annual MOA report and associated records**	
			Year 5:	Implement MEPDES MOA and prepare annual MOA report			

Italic font: MS4 permit language
Blue font: MGs accomplished to date
Red font: UIS Strategy
Bold font: Goals achieved during current permit year