



COLORADO
Department of Transportation

**CDOT MS4 Illicit Discharges Program
Description Document
Version 1
3/1/17**

Table of Contents

1.0 Overview	1
1.1. MS4 Program Area	1
1.2. Updates to this Guidance and Additional Resources.....	1
2.0 Sections of the PDD.....	2
2.1. Introduction	2
2.2. Program Operation Coverage	2
2.3. Applicable Projects.....	2
2.4. Planning and Approval	2
2.5. Program Organizational Structure	2
2.6. Regulatory Structure and Regulatory Mechanism.....	3
2.7. Control Measure Implementation and Procedures.....	3
2.7.1. CDOT Utility Program.....	4
2.7.2. Allowable Non-Stormwater Discharges	4
2.7.3. Process for Approving Other Non-Prohibited Discharges	5
2.7.4. Prohibited Non-Stormwater Discharges	6
2.7.5. ID Identification, Tracking/Investigation, Removing, and Recordkeeping.....	6
2.8. Training and Certifications	9
2.9. Program Compliance and Quality Assurance (Headquarters)	9
2.10. Inspections	9
2.11. Tracking.....	9
2.12. Documents.....	9
2.13. Recordkeeping	9
2.14. Annual Reporting	10
2.15. Overlapping CDOT MS4 Program Areas and Priority Areas.....	10
2.16. PDD Index.....	10
3.0 PDD Requirements.....	11

1.0 Overview

Colorado Discharge Permit System (CDPS) Permit No. COS000005 (MS4 Permit), Part I.C.1 requires Colorado Department of Transportation (CDOT) to develop and maintain a program description document (PDD). “A ‘PDD’ describes how the permittee will meet the requirements of [the MS4] permit and includes a list of citations for documents and electronic record used to comply with the permit requirements; and an organization chart. PDD information must be maintained to reflect current implementation.” (COS000005, Part I.C.1.) Instead of preparing one overarching MS4 Program PDD, CDOT developed individual PDDs for each of CDOT’s seven MS4 program areas.

1. Construction Sites
2. Permanent Water Quality Management
3. Illicit Discharges
4. Industrial Facilities
5. Public Education and Outreach/ Public Involvement and Participation
6. Pollution Prevention and Good Housekeeping
7. Wet Weather Monitoring

This PDD is specific to the MS4 Illicit Discharges Program (MS4 ID Program) and includes a narrative description of how CDOT implements the MS4 ID Program to meet MS4 Permit requirements and a PDD index. The PDD Index is a list of citations and locations for supporting documents for control measures, inspections, training, and other procedures to which the program applies as required by Part I.E.6.c of the MS4 Permit. The PDD Index also identifies staff responsible for MS4 ID Program documentation and transmittal within CDOT as well as, externally to the Colorado Department of Public Health and Environment (CDPHE).

The MS4 ID Program PDD is a regulatory based program management tool the CDOT ID Manager and Hydrologic Resource and Ecological Design (HRED) Section Manager use for internal management of the MS4 ID Program and overall management of CDOT’s MS4 Permit Program.

1.1. MS4 Program Area

The CDOT MS4 Permit covers all areas of the Colorado state highway system and associated rights-of-way (ROWs), as well as any properties owned and operated by CDOT within other jurisdiction’s MS4 Phase I or Phase II permit areas.

CDOT’s MS4 area may expand or contract as municipal boundaries or infrastructure of the cities and counties in Phase I and II areas change. CDOT’s [OTIS mapping site](#) has the up-to-date boundaries of CDOT’s MS4 Areas.

1.2. Updates to this Guidance and Additional Resources

The MS4 ID Program PDD is a dynamic document that is reviewed at least annually, and updated as needed, as part of the HRED Section’s stormwater environmental management system (SWEMS) Plan-Do-Check-Act approach.

MS4 ID Program PDD updates are posted to the CDOT Water Quality Website at <https://www.codot.gov/programs/environmental/water-quality/documents/illicit-discharge-program>.

The PDD Index tracks the revision history of each document relevant to the MS4 ID Program.

The HRED Section Manager and the MS4 ID Program Manager (ID Manager) review the performance of the MS4 ID Program annually. The HRED Section Manager determines, based on the annual review, if additional resources (staff, budget, training, etc.) must be sought to ensure ongoing MS4 permit compliance and program performance.

2.0 Sections of the PDD

Section **Error! Reference source not found.** describes the main programmatic elements to meet the PDD requirements detailed in the MS4 permit. Documents necessary to the execution of the MS4 ID Program are identified by reference, including the document location, to minimize the frequency with which the MS4 ID Program PDD is updated.

2.1. Introduction

The main objective of CDOT's MS4 ID Program is curtailing illicit discharges, illicit connections, and illicit dumping (collectively "illicit discharges" [IDs]) to CDOT's MS4. The MS4 ID Program uses training/education, identification, reporting, investigation, tracking, and removal to curtail IDs. Of these, CDOT emphasizes education through training to identify and eliminate IDs within the MS4 Permit area. All MS4 ID Program processes are directed by CDOT's Public Education and Outreach (PEO) Program.

The purpose of this PDD is to develop and document programmatic information for CDOT management, state and federal agencies, and third parties. Programmatic information provides the methodology and approach used by CDOT to maintain compliance with MS4 Permit ID requirements. This PDD is an overarching and dynamic document that identifies critical elements necessary to maintain regulatory compliance and protect water quality.

2.2. Program Operation Coverage

CDOT's MS4 ID Program is implemented and executed within the CDOT MS4 Areas (Section 1.1).

2.3. Applicable Projects

Not applicable

2.4. Planning and Approval

The permit states that CDOT

"shall maintain a current map of the location of all MS4 outfalls within the permit area, and the names and location of all state waters that receive discharges from those outfalls. A "municipal separate storm sewer system outfall" (outfall) is a point source, as defined herein, at the point where a municipal separate storm sewer discharges to state waters."

The Outfall Reconnaissance Inventory (ORI) serves as CDOT's current map of the location of all MS4 outfalls within the permit area. The ORI is stored with the ID Manager and updated when CDOT's MS4 Area changes. The process/procedures for identifying outfalls are found in the ORI Manual, also stored with the ID Manager.

2.5. Program Organizational Structure

The overall CDOT responsibility for MS4 Permit compliance is the Chief Engineer, who is also the Director of Stormwater Compliance. The Director of Stormwater Compliance is the main signatory and holder of the MS4 Permit. The Hydrologic Resource (HR) Unit, within the HRED Section, is responsible for CDOT's

overall MS4 Permit management and compliance program. The ID Manager reports to the HR Unit Lead, who reports to the HRED Section Manager. Organizationally, the HRED Section Manager reports to the CDOT Department of Transportation Development (DTD), Environmental Programs Branch (EPB).

Direct implementation and administration of the MS4 ID Program’s conditions and compliance activities can occur within each of the five CDOT Regions. Maintenance staff and other individuals, including the public, may identify potential discharges. Region Water Pollution Control Managers (RWPCMs) coordinate with the ID Manager to report and eliminate IDs, as necessary.

The CDOT-CDPHE Liaison provides a regulatory interface between CDOT and CDPHE. This liaison is a CDOT employee, in the HRED Section, who offices at CDPHE and is a valuable resource in permit regulations and interpretation.

Table 1 identifies the CDOT MS4 ID Program Water Quality Team. An overall CDOT Organization Chart can be viewed at: <https://www.codot.gov/about/CDOT-org-chart/view>.

Table 1. CDOT MS4 ID Program Water Quality Team

Title	Name	Contact Information
Director of Stormwater Compliance (Chief Engineer)	Josh Laipply	Available upon request
HRED Section Manager	Tom Boyce	303.512.4053
ID Manager	Tripp Minges	303.757.9788
Water Quality Specialist, ORI Team Leader	Bob McDade	303.757.9127
CDOT/CDPHE Liaison	Jean Cordova	303.692.3570
Assistant ID Manager	Jeremiah Unger	303.513.3927
ID Hotline	Hotline	303.512.4426 (4H2O)

2.6. Regulatory Structure and Regulatory Mechanism

CDOT’s regulatory structure and mechanism for the MS4 ID Program lie within Federal and State Regulations and Statutes. CDOT has legal authority to control activities taking place within their ROW but not outside of the ROW per 40 CFR 122.26(d)(2) and C.R.S.43-1-210.5. Activities outside of CDOT ROW are under the authority of the local municipality or county.

If the source of an ID cannot be identified, additional support may be requested from CDPHE, US Environmental Protection Agency (EPA), Colorado State Patrol (CSP), CDOT Maintenance (MTCE), CDOT Property Management, local police or fire departments and/or adjacent MS4 jurisdictions. CDOT Property Management, CSP, another municipal responder, or a specialized HAZMAT contractor may be needed if the ID is determined to contain hazardous material and, in addition, the CDPHE Spill Hotline is notified (<https://www.colorado.gov/pacific/cdphe/wq-environmental-spills>) at 1-877-518-5608.

If CDOT is not able to eliminate an ID, CDOT reports the ID to CDPHE for enforcement action or the appropriate District Attorney’s office for prosecution.

2.7. Control Measure Implementation and Procedures

“Control measures” are any best management practice (BMP) or other method used to prevent or reduce the discharge of pollutants to state waters. Control measures include, but are not limited to best

management practices. The following subsections describe control measures incorporated into the MS4 ID Program.

2.7.1. CDOT Utility Program

Utility connections through CDOT's MS4 are authorized through CDOT's Utility Permit Program (Utility Program, <https://www.codot.gov/business/permits/utilitiesspecialuse>). The Utility Program is responsible for providing services in the following areas:

- Utility/Highway Project Coordination—Region Utilities Engineers work with other CDOT employees and utility companies to identify the utilities that are located within highway project boundaries and coordinate any necessary relocation of these utilities to facilitate highway construction activities.
- Utility and Special Use Permitting—Utility and Special Use Permits are issued to entities external to CDOT in order to manage the installation of utilities, or the performance of other types of work, within the state highway ROW.

As part of the CDOT permit application for Utility and Special Use permits, CDOT provides language to the applicant to ensure that applicants are aware of being in compliance with applicable state and federal laws, which includes the provisions of the Colorado Water Quality Control Act such as the CDPS requirements. CDOT Utility and Special Use permit applications contain a requirement that the permittee must satisfactorily address environmental, ecological, archaeological, and historical clearances.

2.7.2. Allowable Non-Stormwater Discharges

The following allowable non-stormwater discharges are allowed through CDOT's MS4, all others are prohibited.

- Landscape irrigation
- Lawn watering
- Diverted stream flows
- Irrigation return flow
- Rising groundwater
- Uncontaminated groundwater infiltration (as defined at 40 CFR 35.2005(20))
- Uncontaminated pumped groundwater
- Springs
- Flows from riparian habitats and wetlands
- Water line flushing in accordance with the CDPHE's Low Risk Policy Discharge Guidance¹
- Discharges from potable water sources in accordance with the CDPHE's Low Risk Discharge Guidance²
- Foundation drains
- Air conditioning condensation
- Water from crawl space pumps
- Footing drains
- Individual residential car washing

¹<https://www.colorado.gov/pacific/cdphe/water-quality-permitting-policies>

²Ibid.

- Dechlorinated swimming pool discharges in accordance with the CDPHE’s Low Risk Discharge Guidance³
- Water incidental to street sweeping (including associated sidewalks and medians) and not associated with construction
- Dye testing in accordance with the manufacturers recommendations
- Stormwater runoff
- Discharges resulting from emergency firefighting activities
- Discharges authorized by a CDPS or National Pollutant Discharge Elimination System (NPDES) permit
- Any animal or agricultural waste from farms and ranches that do not require a CDPS or NPDES permit
- Discharges that are in accordance with the CDPHE’s Low Risk Policy guidance documents⁴

2.7.3. Process for Approving Other Non-Prohibited Discharges

Per the MS4 permit, CDOT may apply the following procedures to get other non-prohibited discharges approved:

“Other discharges that the permittee will not consider as an illicit discharge and approved by the Division: The permittee may propose discharges in accordance with the requirements below to seek Division approval to allow the permittee to not effectively prohibit the discharges. Upon approval by the Division, the permittee is not required to address the discharges as illicit discharges in accordance with the requirements of this permit. The permittee can still effectively prohibit these discharges if the permittee determines that the discharge is a significant source of pollution. The permittee must complete the following actions for discharges to be authorized by the Division:

1) The permittee must submit a list of the discharges and the basis that the discharges meet one of the following criteria:

(a) The discharges, with proper management, are not expected to contain pollutants in concentrations that are toxic or in concentrations that would cause or contribute to a violation of a water quality standard; or

(b) The discharges are not eligible for coverage under a CDPS or NPDES general permit and prohibiting the discharges would result in changes to existing practices for the owner or operator of the discharges that are determined by the permittee to be impracticable.

2) For all such discharges identified prior to the effective date of this permit and that will continue to be allowed, the information required by Subsection (1) must be submitted to the Division for approval in accordance with the compliance schedule in I.H.

³Ibid.

⁴Ibid.

3) *The Division may deny approval of the discharge in writing. The Division’s denial will be based on a determination that the provided information does not demonstrate that the criteria of Part I.E.3.a.v(Y)(1) have been met.*

4) *The permittee must public notice the discharges authorized by the Division in accordance with its public notification procedures.*

5) *The permittee must notify the Division within 30 days and revise its regulatory mechanism and procedures within 180 days if the permittee becomes aware of new information that the discharges authorized using the criteria in Part I.E.3.a.v(Y) no longer meets the criteria of that Part.”*

2.7.4. Prohibited Non-Stormwater Discharges

All discharges that do not appear on the allowable discharges list are prohibited. CDOT regards any of these discharges as illicit and follows the reporting procedure as outlined in Section 2.6.

2.7.5. ID Identification, Tracking/Investigation, Removing, and Recordkeeping

The following outlines how CDOT identifies, traces, documents and removes IDs within their MS4. Enforcement practices and tracking are also discussed.

Identification

Potential IDs are reported by MTCE staff working within CDOT ROW, adjacent MS4 personnel, or the general public. Training MTCE staff to recognize potential IDs has proven effective to identifying and eliminating IDs.

- CDOT field staff are trained to identify and report any potential IDs within the MS4 permit area. CDOT staff or non-CDOT staff may choose to report the potential ID in the following ways:
 - verbally or by email or phone to the ID Manager,
 - contact the Illicit Discharge Hotline (303-512-4H2O),
 - verbally or by email to the to the RWPCM,

ID reports may be anonymous or the reporter may request to be included on any follow-up once the potential ID is investigated.

Once identified, potential IDs are determined to be illicit or not by the ID Manager. If illicit, the ID Manager directs follow up investigations to identify the source of the ID.

Tracing/Investigating a discharge and Documentation

Per the MS4 permit, CDOT must:

“Implement procedures, including the tools needed, to trace the source of an illicit discharge when identified within the MS4. At a minimum, the permittee must have the following:

(A) Written procedures and tools for identifying/screening the point of entry or outfall of an illicit discharge.

(B) Written procedures and tools for tracing the illicit discharge within the MS4.”

Once a potential ID has been identified, reported, and determined to be illicit, the ID Manager initiates an investigation to trace the discharge. ID investigations are recorded on the appropriate MS4 ID Program form (A, B, or C). Upon completion of the investigation, the ID Manager determines what actions are needed to eliminate the ID. If the ID will be reported to the CDPHE Emergency Management Program (CDPHE-EMP), this must happen within 24 hours of determining the discharge is illicit and a written notification must be sent within 30 days to the CDPHE EMP.

Further actions and notifications may include:

- Contact the CSP dispatch at 303-239-4501, if the material is a known hazard or a spill occurred on the highway;
- Contact CDOT Property Management;
- Contact MTCE where the discharge occurred;
- Issue a letter of violation;
- Contact the potential discharger;
- Contact CDPHE and/or the District Attorney's office; and
- On-site investigation.

Identifying an Appropriate Response

All IDs, hazardous or non-hazardous, are managed to minimize impact to water quality as well as worker and public safety. If needed, the ID Manager may coordinate with CDPHE, local municipalities, counties, and state or federal agencies to best determine the cleanup approach and level of action required. CDOT's primary response is determined by the ID Manager, with outside assistance when needed.

The ID investigation will attempt to determine at a minimum the following:

- The date that the potential ID was reported to and/or identified by the ID Manager
- The date CDOT responded to the reported/identified ID
- The location of the ID
- Potential responsible party for the ID (if identified)
- A description of the source and nature of the ID
- A list of how the source of the ID was determined
- Documentation of follow-up actions

Other factors that may influence the ID investigation include:

- are special tools needed to identify the source of the discharge?
- What is the composition of the discharge (e.g., is it hazardous material)?
- What is the location of the ID relative to the CDOT MS4 area?
- Has the ID entered state waters?
- Must CDPHE or other agencies need to be notified?
- What are the safety considerations for CDOT staff working in or near the area?

CDOT works with municipalities, industries, the general public, and/or businesses that discharge to resolve the ID. CDOT will contact CDPHE for assistance if a responsible party is not identified.

When an ID containing hazardous material is suspected or known, the CDPHE-EMP is contacted immediately. The CDPHE-EMP coordinates further action levels with other entities such as the local hazardous materials response team and the National Response Center.

The CDOT's Property Management Group is the primary point of contact for cleanup of orphan spills in the CDOT ROW, if the CSP cannot identify the responsible party. The Property Management Group may use Contractors to clean-up orphan spills on CDOT highways and facilities.

Investigation

During the start of the investigation, CDOT personnel locate available aerial photography and/or maps of the area to determine the possible locations where the discharge originated, identify state waters that may be impacted, adjacent MS4 areas, CDOT property boundaries, and general information of the area. These maps can be found using CDOT's OTIS mapping tool or by going to city or county public records.

Field investigation can better determine the origination source and the composition of the discharge through analytical sampling, visual observation, and/or olfactory inspection. These methods can support a determination of whether the discharge is an allowable non-stormwater discharge, regulated by another CDPS Permit, or is illicit.

Some dischargers may have a permit which allows them to discharge or connect to CDOT ROW. These permits may include but are not limited to: CDOT Access, Utility, and/or Special Use Permits, CDPHE permits such as Dewatering, Industrial, and Construction.

Removing an Illicit Discharge

If an ID or illicit connection is confirmed, CDOT may send a letter to the identified responsible party informing them of the ID and the need to permit or eliminate the ID. If no correction is made, CDOT may send one additional letter to the identified responsible party directing them to comply. If the situation is still not resolved, CDOT may report the ID or connection to CDPHE for enforcement or the District Attorney's office for prosecution. Financial responsibility for source removal typically falls on the responsible party. Education and the threat of enforcement/prosecution are typically required to eliminate an ID.

MS4 ID Program Forms A, B and C (available from the ID Manager) record following information for each identification and removal of an ID. If the information is unknown, then the item will be noted on the form as "information is unknown or not applicable."

- 1) The date that the ID was reported to and/or identified by CDOT.
- 2) The date CDOT responded to the reported/identified illicit discharge.
- 3) The location of the ID.
- 4) Potential responsible party for the ID (if identified).
- 5) A description of the source and nature of the ID.
- 6) A list of how the source of the ID was eliminated/resolved.
- 7) Documentation of enforcement actions (if applicable).

Reclamation of Area (If Needed)

On some IDs, reclamation of the area may be needed. CDOT will advise the responsible party on these activities. Reclamation activities may require a Special Use Permit, requirements for CDOT fill dirt, hydrological design, vegetation, BMPs, and/or stabilization standards. Soil sampling may be required to document that the noted pollutants have been removed from the reclaimed area.

When disturbance of an area is necessary, CDOT will advise the responsible party to reclaim the area to historic, pre-ID conditions. This may be determined from ROW maps and/or comparing to surrounding areas. CDOT may also reclaim the area and bill the responsible party for reclamation expenses.

2.8. Training and Certifications

SWEMS has a section for MS4 program area training, including MS4 ID Program training. The main level of training for the MS4 ID program is four hours of ID identification training for MTCE staff. MTCE training covers what IDs look like and the procedures to follow once potential IDs are noticed. These trainings are provided to MTCE new hires and existing MTCE staff. Furthermore, CDOT recommends that MTCE staff investigating IDs are HAZWOPER certified.

All MS4 ID Program training documents identify the name and title of each individual trained, date of training, the type of training, and a list of topics covered. This information is maintained by the ID Manager.

2.9. Program Compliance and Quality Assurance (Headquarters)

Program compliance and quality assurance is a core function of the HRED Section. SWEMS records and tracks critical environmental management and quality assurance/quality control actions and processes. SWEMS is a process to ensure quality and continuing process improvement and uses a basic Plan-Do-Check-Act process.

2.10. Inspections

The process of conducting ID inspections is covered in Subsection 2.7.5.

2.11. Tracking

All investigation and notification documents are tracked using MS4 ID Program Forms available from the ID Manager.

2.12. Documents

All documents (including forms and responses/notifications) used to trace the discharge are the responsibility of the ID Manager.

2.13. Recordkeeping

Recordkeeping is a core SWEMS function and the MS4 Permit identifies specific records that must be kept for demonstrate compliance with ID effluent limitations and recordkeeping requirements.

The following records are available from the ID Manager.

- Current separate storm sewer system map (ORI)
- Regulatory Mechanism documents
- ID investigations
- Discharges that could be excluded from being effectively prohibited:
 - (A) Copies of all required submittals to CDPHE.
 - (B) Copies of the documents used to provide any required public notice and any public comment received as part of the public notice process.
- ID removals
- The map and/or list of ID priority areas.
- MS4 ID Program trainings

- Industrial Facilities: Copies of ID reports and the date CDPHE was notified that the discharge(s) originated from a permitted or unpermitted industrial activities for which CDPS or NPDES permit coverage is available and has a negative water quality impact on the discharge from the MS4.

2.14. Annual Reporting

The MS4 Permit contains annual reporting requirements specific to the MS4 ID Program. CDOT prepares an annual MS4 Program-wide report that is submitted to CDPHE by April 1 of each year, covering January 1 through December 31 of the previous year. The MS4 Permit, Part I.I.1 lists MS4 ID Program information CDOT must track and include in the CDOT Annual Report. As part of Part I.G. of CDOT’s MS4 permit, CDOT must conduct an annual review of each MS4 program that includes the following:

- (A) Provide the total number of unresolved reports/identification of IDs and the reason why they are unresolved.

Records and information needed by the HRED Section for the Annual Report are obtained from ESCAN, the Regions’ Environmental units, the Property Management Unit, and/or MTCE. CDOT must identify if any other entity helped to “satisfy” any of the permit obligations.

Electronic copies of MS4 Annual Reports can be provided upon request.

2.15. Overlapping CDOT MS4 Program Areas and Priority Areas

IDs that coincide with another jurisdiction’s MS4 area require coordination between the ID Manager, the RWPCM, other appropriate individuals (CDOT and Contractor), and the other jurisdiction, as needed, to determine the ID’s origin, which jurisdiction’s MS4 Permit applies to the ID (CDOT or other jurisdiction), and how to respond to the ID.

The ID Manager maintains records of IDs that overlap other jurisdictions’ MS4 areas.

2.16. PDD Index

The PDD Index (Table 2) is the complete list of documents, materials, standard operating procedures, design standards, guidance documents, software, and other sources used to manage and implement the MS4 ID Program. The purpose of the PDD Index is to identify reference documents that define the MS4 ID Program and also identify documents that will be affected by informational or process changes. For example, a change in a CDOT specification can have a cascading effect on several document such as procedures outlined in this PDD, training materials and tracking forms.

The ID Manager, or designee, is responsible for monitoring and reacting to internal and external program documentation changes that can affect other documentation critical for MS4 Permit compliance.

Table 2. MS4 ID PDD Index

Document	Responsible Party	Date/Revision history	Storage Location
Organization Chart	HRED Section Manager	2017	https://www.codot.gov/about/CDOT-org-chart/view
Storm Sewer System Map	ORI Team Leader	January 20, 2016	https://www.codot.gov/programs/environmental/water-quality/new-cdot-ms4-outfall-atlas
Priority Areas	ORI Team Leader	January 20, 2016	https://www.codot.gov/programs/environmental/water-quality/new-cdot-ms4-outfall-atlas
CDOT Illicit Discharge Forms	ID Manager	2009	ID Manager

Document	Responsible Party	Date/Revision history	Storage Location
Illicit Discharge Tracking Spreadsheet	ID Manager	2017	ID Manager
Field Investigation Forms	ID Manager	2009	ID Manager
CDPHE Notification Process	ID Manager	2009	ID Manager
Discharger Notification templates	ID Manager	2009	ID Manager
Industrial Facilities documentation	ID Manager	Under development	ID Manager
MS4 ID Program training documentation	HRED Section Manager	Under development	HRED Section Manager
SWEMS training documentation	HRED Section Manager	2017	HRED Section Manager
IDDE Wallet Card	ID Manager	2009	https://www.codot.gov/programs/environmental/water-quality/documents/illicit-discharge-program/cdot_wq-wallet_4up_040108.pdf/view
IDDE Visor Card	ID Manager	2009	https://www.codot.gov/programs/environmental/water-quality/documents/illicit-discharge-program/cdot_wq-visor_photo_2up_040208.pdf/view
Illicit Discharge Pocket Guide	ID Manager	2009	https://www.codot.gov/programs/environmental/water-quality/documents/illicit-discharge-program/2009-ID-manual/appendixb-outfall_field_screening/appendixb-6_fieldpocketguide/cdot-ID_pocketguide2009.pdf/view
Outfall Field Screening Manual	ORI Team Leader	2008	https://www.codot.gov/programs/environmental/water-quality/documents/illicit-discharge-program/2009-ID-manual/appendixb-outfall_field_screening/appendixb-7/outfallfieldscreeningmanual.pdf/view

3.0 PDD Requirements

The MS4 Permit details required PDD content for the MS4 ID PDD. These requirements are presented in the MS4 Permit, Part I.E.c (PDD) and Part 1.H (Compliance Schedule; Table 2 Compliance Schedule). Table 3 summarizes the primary MS4 ID PDD requirements and where the requirement(s) is/are addressed in this PDD.

Table 3. MS4 ID PDD Regulatory Requirements

MS4 Permit Citation	MS4 Permit-required PDD Content	MS4 ID PDD Section or Subsection
Part I.C.1.a.	Current Control I.D. and I.E. that describes how the requirements of Parts I.D. and I.E. are met.	Subsection 2.7
Part I.C.1.b.	Current Documents and Electronic Records: A list of citations for documents and electronic records used to comply with permit requirements. It is not required that the PDD repeat the information included in the cited documents. The PDD must include the names of the most recent version of the documents, source/author of the document, date of the document, and location(s) where the supporting documentation is maintained.	Subsections 2.12, 2.13, and 2.16
Part I.C.1.c.	Current Organizational Chart: An organizational chart indicating responsibility over applicable departments by the legal contact.	Subsections 2.5 and 2.16
Part I.C.2.	The PDD must be available to the public at reasonable times during regular business hours and maintained in a format that can be submitted to the Division within 10 business days of a request.	https://www.codot.gov/programs/environmental/wate

MS4 Permit Citation	MS4 Permit-required PDD Content	MS4 ID PDD Section or Subsection
		r-quality/documents/illicit-discharge-program
Part I.C.3.	Information in the PDD may be revised by the permittee at any time. The permittee must modify the PDD as changes occur to ensure the information is up to date.	Subsection 1.2
Part I.E.3.c.i.	Storm Sewer System Map: A list of citation(s) and location(s) of the storm sewer system map and procedures for updating the map for new or removed outfalls or expanded permit areas.	Subsections 2.4 and 2.16
Part I.E.3.c.ii.	Regulatory Mechanism: A list of the citation(s) and location(s) of the required elements of the regulatory mechanism, including a list of the associated program documents used to meet the regulatory mechanism requirements.	Subsection 2.6
Part I.E.3.c.iii.	Regulatory Mechanism Exemptions: A list of the citation(s) and location(s) of regulatory mechanism elements that allow for exemptions and the documented procedures that confirm that any exemptions, waivers, and variances comply with the permit.	Not applicable
Part I.E.3.c.iv.	Discharges that have been excluded from being effectively prohibited: Identification of any illicit discharges listed in Part I.E.3.a.v. that the permittee will consider an illicit discharge.	Subsections 2.7.2, 2.7.3, 2.7.4, and 2.16
Part I.E.3.c.v.	Tracing an Illicit Discharge: (A) A list of citation(s) and location(s) of the specific tools available that will allow tracing of an illicit discharge, including as applicable storm sewer maps, dye tracers, cameras, aerial maps, etc. (B) A list of citation(s) and location(s) of the written procedures for tracing an illicit discharge, including the citation(s) and location(s) of supporting documents. (C) Documenting an illicit discharge: 1) A list of citation(s) and location(s) of the record keeping system(s) used to maintain the required information. 2) A list of citation(s) and location(s) of the written procedures used for documenting information on illicit discharge reports, including if applicable, identification of how information is consolidated between separate functional groups within the permittee's organization.	Subsections 2.7.5 and 2.16
Part I.E.3.c.vi.	Discharges that could be excluded from being Effectively Prohibited: A list of citation(s) and location(s) of the written procedures for excluding discharges from being effectively prohibited and the discharges that have been excluded from being effectively prohibited.	Subsections 2.7.3 and 2.16
Part I.E.3.c.vii.	Removing an Illicit Discharge: A list of citation(s) and location(s) of the written procedures for removing an illicit discharge, including the citation(s) and location(s) of supporting documents.	Subsections 2.7.5 and 2.16
Part I.E.3.c.viii.	Enforcement Response: A list of citation(s) and location(s) of the specific enforcement mechanisms available and written procedures for enforcement response, including the citation(s) and location(s) of supporting documents. The document(s) must detail the types of escalating enforcement responses the permittee will take in response to common violations and time periods within which responses will take place.	CDOT's enforcement authority to prohibit IDs or illegal connections aside from the Utility and Access permits (subsection 2.7.1) is CDPHE and/or the District Attorney's office.
Part I.E.3.c.ix.	Priority Areas: A list of citation(s) and location(s) of the priority areas.	Subsections 2.13 and 2.16

MS4 Permit Citation	MS4 Permit-required PDD Content	MS4 ID PDD Section or Subsection
Part I.E.3.c.x.	Training: A list of citation(s) and location(s) of the training program and supporting documents.	Subsections 2.8 and 2.16
Part I.E.3.c.xi.	Industrial Facilities: A list of citation(s) and location(s) of the written procedures for reporting discharges from industrial activities to the Division, including the citation(s) and location(s) of supporting documents.	Subsections 2.13 and 2.16