

## SECTION 1.0

### PROGRAM MANAGEMENT

The Nevada Department of Transportation's (NDOT's) Storm Water Management Program (SWMP) has been organized to provide a cohesive and structured program which clearly addresses each National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer Systems (MS4s) Permit (NV0023329) (Permit) requirement. The organization of this SWMP differs from the organization within the Permit issued by Nevada Division of Environmental Protection (NDEP). NDOT has clearly identified the Permit requirements by quoting and italicizing the Permit requirement at the beginning of the subsection in which it is addressed in this SWMP. A copy of the Permit is provided in Appendix C and the separate Clear Creek Storm Water Management Program is located in Appendix D.

#### 1.1 Overview

*[4.1 General Requirements: Develop, implement, and enforce a SWMP designed to reduce the discharge of pollutants from NDOT's MS4 to the maximum extent practicable (MEP) to protect water quality, and to satisfy the appropriate water quality requirements of the CWA]*

*[4.1.1 Submit the SWMP to NDEP no later than one (1) year after the effective date of this permit; and]*

*[4.1.2 Fully implement the SWMP within five (5) years of the authorization date of this permit; and]*

*[4.1.10 Proposed management programs shall describe priorities for implementing controls and shall be based on Public Outreach and Education; Illicit Discharge and Detection; Industrial Facility Monitoring and Control; and a Construction Site BMP Program; and]*

*[4.1.11 Implement other BMPs identified in this permit; and]*

*[4.1.12 Pending submittal of the SWMP, NDOT shall continue to implement current BMPs.]*

*[4.13 Responsibility for Stormwater Management Program Implementation:]*

*[4.13.1 NDOT must implement the SWMP on all new areas added to NDOT's portion of the MS4 (or for which NDOT become responsible for implementation of stormwater quality controls) not later than one year from addition of the new areas.]*

*[4.13.2 Information on all new annexed areas and any resulting updates required to the SWMP must be included in the annual report.]*

NDOT developed this SWMP to describe the minimum measures NDOT will take to reduce the discharge of polluted storm water from its owned and operated storm drain system. This SWMP addresses storm water pollution and prevention associated with NDOT's highway planning, design, construction, and maintenance. This section of the SWMP describes the organizational structure of NDOT with regard to storm water management. This section is organized as follows:

- Section 1.2 describes the storm water regulations and application to NDOT.
- Section 1.3 explains NDOT's organization and the responsibilities of individuals and groups with respect to storm water quality management.
- Section 1.4 describes how NDOT may coordinate with other municipal storm water permittees (e.g., cities and counties) who also have responsibilities for managing discharges from their storm water drainage systems.
- Section 1.5 describes the legal authority supporting the implementation of NDOT's SWMP.
- Section 1.6 describes the source identification requirement of the Permit.

## **1.2 Storm Water Regulations and NDOT**

Storm water regulations are designed to mitigate storm water runoff before it negatively impacts the downstream environment. Storm water flows off the land and impervious surfaces into the storm drain conveyance system or directly into receiving waters. The increase of impervious surfaces from urbanization increases the amount and velocity of runoff as well as the potential pollutant load in the runoff. The pollutants in storm water runoff as well as the increased flows can negatively impact the water quality of the receiving waters. Studies of urban storm water including the United States Environmental Protection Agency's (U.S. EPA) Nationwide Urban Runoff Program (NURP) 1983 study have motivated the U.S. EPA to regulate storm water runoff and define storm water pollution as the leading cause of impairment to the nation's waters.

In 1987, Congress amended the Clean Water Act (CWA) to include regulating municipal and industrial discharges through the NPDES program. The U.S. EPA issued the final regulations for NPDES permitting for storm water discharges in 1990. The NPDES program was implemented in two phases. Phase I addressed storm water runoff from medium and large MS4s with populations greater than 100,000, construction activity disturbing more than 5 acres, and industrial activities. Phase II expanded the program to include storm water discharges from small MS4s and construction site activity disturbing more than 1 acre.

During Phase I, NDOT was defined as the co-permittee on large MS4s permits for Clark and Washoe Counties. In the wake of Phase II, NDOT was faced with co-permittee responsibilities for all regulated small MS4 areas as well as the individual permit for the Lake Tahoe basin. NDOT requested a single statewide NPDES permit from NDEP to fulfill the large and small MS4 requirements as well as the Lake Tahoe permit. In February 2004, NDOT was issued the NPDES MS4 Permit (NV0023329) (Permit) by NDEP. In September 2004, NDOT received a letter from NDEP confirming acceptance of NDOT's request to cancel the discharge permit NV0023205 for NDOT discharges within the Lake Tahoe basin. Correspondence on this matter is contained in Appendix B.

NDOT, however, continues to be regulated under a specific NPDES Permit authorizing storm water discharges from U.S. Highway 50 to a central storm water treatment unit, which in turn flows to the Edgewood Creek watershed in South Lake Tahoe. NDOT is a co-permittee with several private entities and Douglas County (collectively the Stateline Storm Water Association), who share operation and maintenance responsibilities for the common facilities of the storm water treatment system.

This stateline permit uses numerical water quality criteria developed by the Tahoe Regional Planning Agency (TRPA) for surface and groundwater discharges. For reasons that are described in the stateline permit, the groundwater discharge criteria are applied as limits, and surface water discharge criteria are applied as goals, with the requirement to attempt improvements should exceedances persist. This stateline permit requires implementation of a Monitoring Plan, an Operation and Maintenance Plan, and submission of annual reports that include plans to improve the system performance if exceedances persist or if reasonable improvements can be made. At the present time (2004), a consultant retained by the Stateline Storm Water Association is implementing the Monitoring Plan and managing the operation and maintenance requirements including reporting.

NDOT's Permit requires NDOT to address the discharge of pollutants from NDOT's storm water drainage systems by developing a SWMP. All NDOT facilities and activities will be covered in

the SWMP, including NDOT highways and right-of-ways, highway-related facilities, and construction activities in the highway right-of-ways statewide. NDOT will implement the SWMP on any and all newly acquired areas to NDOT’s storm drain system no later than one year after acquisition and will include information pertaining to new areas in the Annual Report.

The issuance of the Permit has initiated the development of NDOT’s comprehensive program for storm water management throughout the state. The Permit requires the SWMP to include the following principle program elements: Public Outreach and Education, Maintenance, including Illicit Discharge and Detection, Construction Site BMPs, Monitoring, and Reporting. The SWMP outlines the Best Management Practices (BMPs) to achieve pollution prevention to the Maximum Extent Practicable (MEP), thereby protecting water quality and satisfying the appropriate requirements of the CWA. Table 1-1 describes which sections of the SWMP address which requirements in the Permit.

<b>Table 1-1. NDOT SWMP Organization <sup>(1)</sup></b>	
<b>Permit Requirement</b>	<b>NDOT SWMP Organization</b>
3.1 Discharges to Water Quality Impaired Waters	Section 2.0
3.2 Discharges to Clear Creek	Appendix D
3.3 Discharges into Sanitary Sewer Systems	Section 11.0
4.1 Storm Water Management Program	Section 4.0
4.2 Adequate Legal Authority	Section 1.0
4.3 Source Identification	Section 1.0, Appendix A
4.4 Characterization Data	Section 9.0
4.5 Public Outreach and Education	Section 8.0
4.6 Best Management Practices	Section 3.0, Section 4.0
4.7 Illicit Discharge and Detection	Section 7.0
4.8 Industrial Facility and Monitoring and Control	Section 10.0
4.9 Construction Site BMP Program	Section 5.0
4.10 Sharing Responsibility	Section 1.0
4.11 Reviewing and Updating Storm Water Management Program	Section 12.0
4.13 Responsibility for Storm Water Management Program Implementation	Section 1.0
4.14 Maintenance Program Management	Section 6.0
5.1 Monitoring	Section 9.0
5.2 Record Keeping	Section 9.0
5.3 Reporting	Section 12.0

(1) The following Permit sections do not require text in the SWMP: Section 1, 2, 14.12, 6 and 7.

### **1.3 NDOT Storm Water Management Responsibilities and Resources**

*[4.1.7 The management program shall include a description of staff and resources available to implement the program elements]*

*[4.1.9 Proposed programs may impose controls on a system wide basis, a watershed basis, a jurisdiction basis, or on individual outfalls; and,]*

NDOT's mission is to efficiently plan, design, construct, and maintain a safe and effective transportation system for Nevada's motoring public, taking into consideration the environment, economic and social needs, and inter-modal transportation opportunities. NDOT is responsible for the planning, construction, operation, and maintenance of over 5,400 miles of highways and over 1,000 bridges that make up the state's highway system.

NDOT is divided into three Districts (Figure 1-1). District I covers southern Nevada, with headquarters in Las Vegas, and a major maintenance station in Tonopah. District I has three Assistant District Engineers; two in Las Vegas and one in Tonopah. The Assistant District Engineer in Tonopah is responsible for both construction and operations. In Las Vegas, one Assistant District Engineer is responsible for construction and one is responsible for operations. District II covers northwest Nevada, with headquarters in Reno. In District II there are two Assistant District Engineers, one responsible for construction and one responsible for operations. District III covers northeast Nevada, with headquarters in Elko, and major maintenance stations in Winnemucca and Ely. District III has three Assistant District Engineers, one in Elko, one in Ely, and one in Winnemucca, who are responsible for both construction and operations.



NDOT's central headquarters are located in Carson City. The functions of NDOT are divided between Headquarters and the three Districts. Headquarters is managed by the Director and Deputy Director with general functional management being delegated to the Assistant Directors and Division Chiefs. Both District II and District III report to the Deputy Director at Headquarters. In District I, the District Engineer reports to the Southern Nevada Deputy Director. Divisions are typically broken into Sections managed by each respective Division Chief. NDOT Headquarters consists of four major Divisions:

- Operations
- Engineering
- Planning
- Administration

The Assistant Director for Operations provides operational support for NDOT's Division Chief's management of the Architecture, Headquarters Maintenance, Materials, Construction, and Equipment Divisions.

The Assistant Director for Engineering is responsible for the pre-construction engineering duties excluding planning activities. The Assistant Director for Engineering oversees the Division Chiefs' management of the Roadway Design (including Hydraulics and Specifications), Structural Design (Bridge), Safety and Traffic, Location, Right-of-Way, and Environmental Services Divisions.

The Assistant Director for Planning provides the program planning and statistical support for NDOT's engineering, maintenance, and construction activities. The Assistant Director for Planning oversees the Division Chiefs' management of the Transportation Planning, Research, Operations Analysis, Roadway Information Systems, Inter-modal Planning (Program Development), and Traffic Information Systems Divisions.

The Assistant Director for Administration supports administrative activities for NDOT's engineering, maintenance, and construction activities. The Assistant Director for Administration

oversees the Division Chiefs' management of the Accounting, Financial Forecasting, Flight Operations, Data Processing and Telecommunications (Information Services), Financial Management, and Administrative Services Divisions.

Nevada is divided into three Districts to effectively direct NDOT's program locally. Each District is managed by the District Engineer. The main responsibility for the District Engineer is to manage NDOT's construction and maintenance (operations) programs.

In District I, one of the Assistant District Engineers in Las Vegas and the Assistant District Engineer in Tonopah is responsible for construction. One of the two Assistant District Engineers in District II is responsible for construction and each of the three Assistant District Engineers in District III is responsible for construction in their area. Each Assistant District Engineer supervises the construction operations with the Resident Construction Engineer who implements construction contracts.

For maintenance, the Headquarters Maintenance Division establishes the policies and procedures to be implemented by each District and maintains the Maintenance Management System (MMS). In District I, one of the Assistant District Engineers for Las Vegas and the Assistant District Engineer in Tonopah is responsible for maintenance. One of the Assistant District Engineers in District II and each of the three Assistant District Engineers in District III are responsible for maintenance in their designated areas. Each Assistant District Engineer is supported by the Maintenance Manager who is primarily responsible for the maintenance of the road system.

NDOT Headquarters initiates directives to implement the SWMP. The Environmental Services Division's Water Quality Specialist (WQS) manages and coordinates Permit compliance and oversees the development and implementation of the SWMP. NDOT has created a Water Quality Erosion Sediment Control (WQESC) Implementation Team and Steering Committee to develop and implement the WQESC program. The program encompasses more than NPDES regulations of storm water discharges from a MS4, however the Implementation Team/ Steering Committee is an appropriate forum to create policies and procedures promulgated by the Permit.

The WQESC Implementation Team is comprised of grass root technical staff chosen by the committee representatives. The Implementation Team is the backbone of the WQESC program and tasked to ensure elements of the program are reviewed and implemented including specific actions, performance measures, targets, and milestones for meeting each program objective. The Implementation Team meets monthly.

The WQESC Steering Committee is comprised of Division heads, Assistant Directors, and Assistant District staff. They take corrective action based on the Implementation Team's input. The Implementation Team is responsible for providing guidance and implementing/changing policies and procedures. The Steering Committee identifies and prioritizes the Implementation Team's actions, performance measures, targets, and milestones. The Steering Committee authorizes additional or continued resources, as needed, to maintain or enhance program objectives. The Steering Committee meets quarterly.

The WQESC Implementation Team/Steering Committee includes a representative member from each of the following Divisions or Sections:

- Environmental Services
- Hydraulics
- Construction
- Specifications
- Roadway Design
- Materials
- Headquarters Maintenance
- District II representing all three Districts
- Assistant Directors for Engineering and Operations
- Federal Highway Administration (FWHA)

The relationship between Headquarters and the WQESC Implementation Team is described in Figure 1-2 and is followed by a description of roles and responsibilities within each Division or Section.

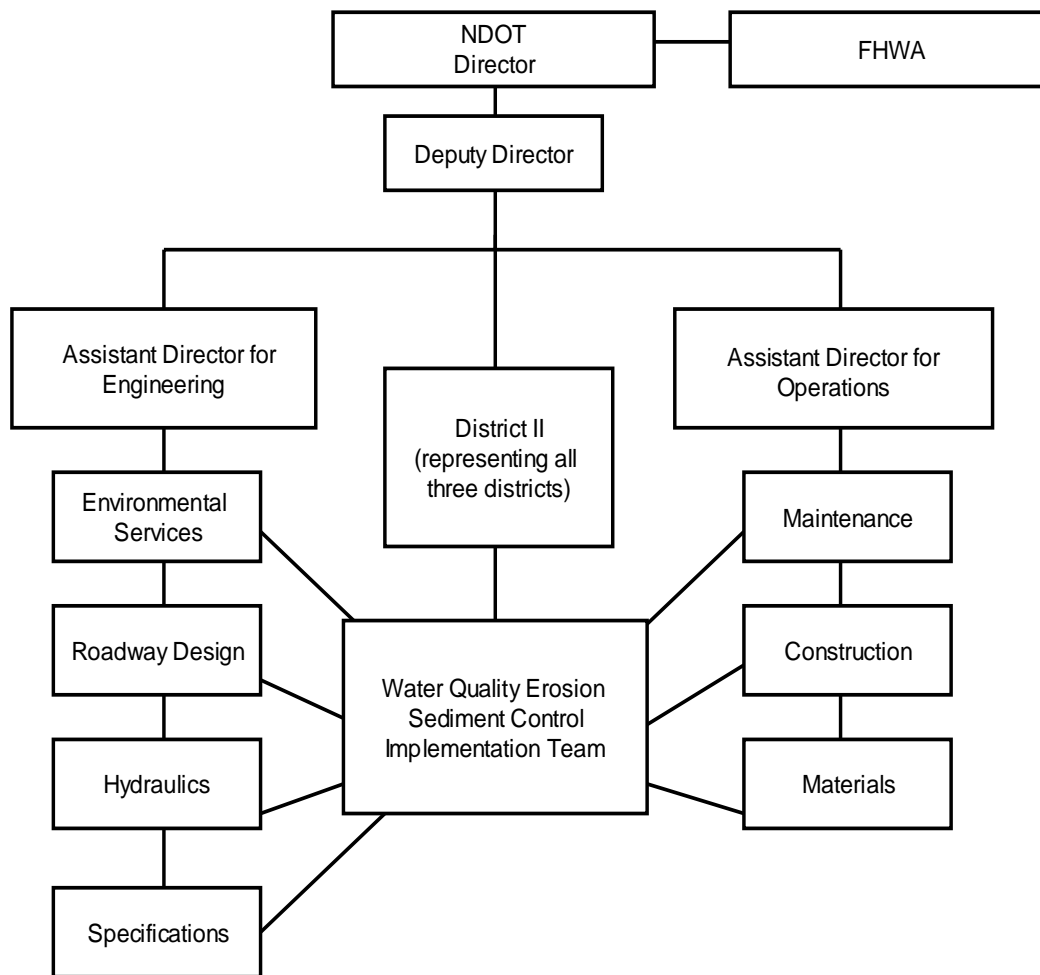


Figure 1-2 NDOT WQESC Organizational Chart

The **Environmental Services Division** is responsible for securing and/or providing oversight of all regulatory permits relative to water quality with the exception of the TRPA Construction Permit and Dust Control Permits. The Division incorporates specific regulations and procedures into NDOT’s Standard Specifications and project Special Provisions. Environmental Services often works with Hydraulics to identify and resolve potential regulatory, construction, and maintenance issues. This includes updating the Storm Water Quality manuals and standards, as

well as performing the necessary environmental monitoring for projects. Environmental Services is specifically responsible for all non-structural temporary BMPs and associated specifications and works with the Specifications Division to incorporate temporary BMP details into the contractual documents where applicable. The Environmental Services' WQS is the primary contact for regulatory compliance particularly with the SWMP and construction issues associated with the General Permit for Storm Water Discharges Associated with Construction Activity (General Permit). The WQS oversees development of Storm Water Pollution Prevention Plans (SWPPPs) and Temporary Working in Waterway/Discharge Permit BMP Plans for NDOT maintenance projects and is the primary contact for maintenance regulatory compliance issues.

The **Hydraulics Section** is mainly responsible for establishing water flows and drainage structure sizes, and analyzing impacts to floodways and flood plains. Hydraulics also reviews road surface water treatment, slope conditions, and renovations. For projects categorized as medium impact projects Hydraulics establishes minimum standards and the appropriate lump sum range for the project. For projects categorized as having a high potential for environmental impacts, Hydraulics designs or provides consultant oversight of a comprehensive erosion control plan to be included in the project Plans, Specifications, and Estimates (PS&Es). Hydraulics has designated an engineer as the Lake Tahoe Environmental Improvement Program (EIP) coordinator responsible for securing TRPA construction permits. Senior Hydraulic Engineers provide technical support to the Environmental Services Division to identify and resolve potential regulatory, construction, or maintenance concerns. Hydraulics is responsible for BMP design, specifications, and research associated with temporary and permanent structural BMPs. The cooperative effort between Hydraulics and Environmental Services resulted in the development and continued maintenance of the Storm Water Quality Manuals, guidelines, and specifications.

The **Construction Division** is responsible for developing and maintaining an operational plan and structure that promotes effective administration and management of the statewide construction program and all of its essential elements. Construction oversees projects from

inception to completion through the coordination of the four Sections within the Division. The Constructibility Section is responsible for the constructability review of the plans and specifications, claim support and review, contract closeout and critique, and change order/letter of authorization monitoring and tracking. The Quality Assurance/Quality Control Section is responsible for independent assurance testing and inspection oversight of contracts during construction, providing training for the Construction Crews field personnel, field review and project scoping of the NDOT's 3R program and oversight of the nuclear density gauges used throughout NDOT. The Administration Section responsibilities include contractor payment, change order processing, documentation oversight/contract closeouts, global oversight of Stewardship projects, and consultant coordination. The Contract Compliance Section is responsible for external Equal Employment Opportunities, the Disadvantaged Business Enterprise (DBE) program, monitoring and enforcing the prevailing wage requirements, and ensuring issues regarding subcontractors are administered within NRS and NDOT guidelines. For NDOT construction projects, the Construction Division is responsible for inspection and enforcement of both temporary structural and non-structural BMPs.

**Roadway Design Division** is responsible for preparing the highway construction plans and specifications. Roadway Design categorizes the potential environmental impacts of each project by completing the Project Categorization Score Sheet. The Project Categorization Score Sheet categorizes projects by no, low, medium, or high impacts relative to water quality. For projects that fall in the no and low impact Roadway Design Division will include 637 0003 Temporary Pollution Control (Lump Sum) in the amount of \$5,000 in the project estimate. For medium and high impacts Hydraulics calculates the cost and bid items for the PS&Es.

**Specifications Division** is responsible for general specifications development and review. The specifications in the Storm Water Quality Manuals are reviewed and updated by Specifications as necessary.

**Materials Division** is responsible for supporting the WQESC program. Specifically, the Division incorporates NDOT's Standard Specifications and Storm Water Quality Manuals

guidance into practices such as geotechnical exploration, bituminous/pavement/aggregates analysis, and structural and chemical testing procedures.

**District Maintenance** in each District is responsible for the upkeep and maintenance of the highway system according to the NDOT Maintenance Manual and associated protocols. Maintenance plays a significant role in NDOT construction projects. Upon District's acceptance of a completed contract the contractor will submit the Notice of Termination (NOT) to the NDEP. The NOT submission ends the contractor's responsibilities with respect to General Permit compliance. If final stabilization has not yet been achieved per NDEP requirements, coverage is transferred to NDOT until 70% re-vegetation or other stabilization is established. This requires written notification to NDEP from NDOT at the time the contractor submits the NOT to formally transfer control of the General Permit designating NDOT as the permittee.

The project is then turned over to District Maintenance who, under the Environmental Services Division's direction, will be responsible for additional seeding, irrigation, or performing other necessary activities to fulfill the 70% re-vegetation requirement or achieve sufficient site stabilization. During this time, all of the requirements of the General Permit still apply to the project including inspecting and maintaining the appropriate temporary BMPs. After final site stabilization has been completed, District Maintenance will remove the temporary BMPs and file the NOT, which will release NDOT from General Permit coverage. An outside contractor may also be hired to perform the final stabilization work.

Maintenance also maintains permanent BMPs that are constructed by NDOT. NDOT Maintenance projects include coordination between District Maintenance, Hydraulics, and Environmental Services.

The **Districts** are represented in the WQESC Implementation Team by District II. Each District is responsible for supporting the WQESC program and implementation of the SWMP as directed by NDOT Headquarters.

The WQESC Implementation Team is responsible for developing and implementing the Storm Water Quality Manuals in accordance with the Inter-modal Surface Transportation Efficiency Act (ISTEA). The ISTEA requires the Federal Highway Administration (FHWA) to develop guidelines for sediment and erosion control for highway projects using federal funding. To comply with the ISTEA, the FHWA adopted the American Association of State Highway and Transportation Officials (AASHTO) drainage guidelines. The FHWA requires states to either apply the AASHTO guidelines or develop their own standards and practices of erosion control. To comply with the requirements, NDOT developed the two Storm Water Quality Manuals: the Planning and Design Guide (PDG) and the Construction Site BMPs Manual (BMP Manual). The PDG is a guidance tool for NDOT projects. It provides guidance in policy and regulatory requirements to incorporate permanent BMPs into new project planning. The BMP Manual is designed to support NDOT staff and contractors with detailed guidance on regulatory requirements concerning construction site activity, including temporary BMPs.

This SWMP contains the programmatic details of NDOT's program and general guidance for implementation. The following NDOT manuals provide the detailed guidance necessary to fulfill the Permit requirements and are referenced in this SWMP:

- Storm Water Quality Manuals
  - Planning and Design Guide (PDG)
  - Construction Site BMP Manual (BMP Manual)
- NDOT Standards and Specifications
- NDOT Draft Drainage Manual
- NDOT Road Design Division Policy and Procedures
- NDOT Maintenance Manual

NDOT's WQS and the WQESC program promote coordination between NDOT's functional programs and the Districts to provide guidance for Permit compliance. This guidance consists of Permit and SWMP implementation information, including schedules, reporting, legal authorities, budget assistance, and other information required for implementation. NDOT will maintain adequate fiscal resources to comply with the Permit and develop and implement an effective SWMP.

## 1.4 Municipal Storm Water Permittees Coordination

*[2.4.1 NDOT may partner with other MS4s to develop and implement NDOT's SWMP. The description of NDOT's SWMP must clearly describe permittees are responsible for implementing each of the control measures]*

*[4.1.8 Separate proposed programs, or one or more joint programs, may be submitted by NDOT]*

*[4.1.9 Proposed programs may impose controls on a system wide basis, a watershed basis, a jurisdiction basis, or on individual outfalls]*

*[4.10.1 NDOT may either share responsibility or assign responsibility to one or more regulated MS4s, and may implement BMPs individually, as a group, or through consultants. The SWMP shall include a description of how responsibility is being shared or assigned.]*

NDOT may elect to coordinate with other municipalities to develop and implement portions of NDOT's SWMP. NDOT is responsible to clearly define the roles each permittee will assume in fulfilling the Permit requirements. The Annual Report will record the coordination between NDOT and other MS4s as it is established throughout the Permit period. Additionally, the Annual Report will identify how responsibilities will be shared between the MS4s specific to the individual Permit requirements.

## 1.5 Legal Authority

*[4.2.1 The SWMP shall provide a description of NDOT's legal authority, established by statute, regulation, ordinance or series of contracts, which authorizes or enables the applicant to:]*

*[4.2.1.1 Prohibit through regulation, ordinance, order, or similar means, illicit discharges to the municipal separate storm sewer;]*

*[4.2.1.2 Control through regulation, ordinance, order, or similar means the discharge to a municipal separate storm sewer from spills, dumping or disposal of materials other than stormwater]*

*[4.2.1.3 Require compliance with conditions in regulation, ordinances, permits, contracts or orders]*

*[4.2.1.4 Carry out all inspection, surveillance, and monitoring procedures necessary to determine compliance and noncompliance with the prohibition of illicit discharges to the MS4s.]*

*[4.2.2 NDOT shall provide written notice to NDEP of any formal proposal to modify regulation or ordinances regulating storm water discharges into the municipal storm sewers. Before any regulation or ordinance is modified, NDEP shall have an opportunity to comment on the proposed modification.]*

NDOT's jurisdiction to administer the transportation program is authorized by the Nevada Legislature through the enactment of the Nevada Revised Statutes (NRS). The NRS authorizes NDOT to design, build, and maintain the Nevada Highway System. The NRS chapter 408.285 states "...the Department is responsible for their [state highways] construction, reconstruction, improvement, and maintenance". The legal authority of NDOT enables the department to not only administer the program but specifically address either dumping or material spills and illicit

discharges that may impact the storm drain system. The complete listing of the NRS is available through the Nevada Law Library.

NDOT has legal authority to address illicit connections through NRS 408.210 which addresses encroachments. NRS 408.050 defines encroachment as “...any tower, pole, pole line, wire, pipe, pipeline, fence, billboard, approach road, driveway, stand or building, crop or crops, flora, or any structure which is placed in, upon, under, or over any portion of highway rights-of-way”. The department has the authority (NRS 408.210) to remove the encroachment if the owner has not commenced to remove the encroachment five days after issuance of notice.

NDOT’s legal authority also addresses dumping or disposal of materials on highways which could enter NDOT’s storm drain system in NRS 202.185 which reads “...it is unlawful for any person to throw or deposit or cause to be thrown or deposited on any public highway within the State of Nevada, or within a distance of 1,000 feet from the center of any public highway, any dead animal, dirt, garbage, or rubbish as defines in subsection 1.” Any person who violates the provisions of this section is guilty of a misdemeanor.

NDOT also complies with the NDOT 2001 Standard Specifications for Road and Bridge Construction. The following Standard Specifications are relevant to storm water quality during NDOT construction projects: Standard Specification Sections 106.08, 106.2, 107.01, 107.07, 107.12, 107.14, 211, 212, 637, and 726.

NDOT will provide written notice to NDEP of any formal proposal to modify regulations or ordinances regulating storm water discharges into municipal storm sewers. Before any regulation or ordinance is modified, NDEP will have an opportunity to comment on the proposed modification.

## **1.6 Source Identification**

*[4.3.1 The SWMP shall provide, at a minimum: maps of NDOT’s MS4, including the location of any major outfall that discharges to waters of the United States.]*

NDOT has developed maps to identify their owned or operated MS4s discharging to Waters of the United States. The District maps and associated lists of NDOT facilities are located in Appendix A.