2014 AASHTO
Stormwater Practitioners Meeting

EPA Audit Experience
&
Lessons Learned

Jerry Chaney, Utah DOT

UDOT's Audit Experience

Notification of Joint EPA/DWQ Audit of UDOT:

- Email to UDOT May 21, 2013
  - Audit held June 17-21, 2013

- List of 54 questions received by email May 22, 2013
  - 3 ½ weeks to collect and produce requested documentation
  - Documents to be available at the Audit

- Audit team: 2 EPA staff and 5 State Division of Water Quality (DWQ) staff

UDOT's Audit Experience

Documents Requested by EPA – Major Topics:

- Program Management/Monitoring
  - Organization of UDOT
  - Personnel responsible
  - Regulatory mechanisms for legal authority
  - Policies related to non-storm water discharges
  - Monitoring plans for wet/dry weather screening

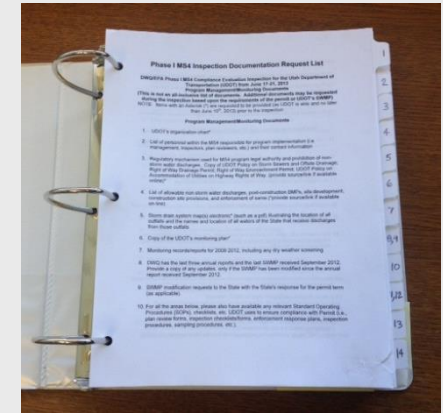- Six Required Control Measures outlined in the SWMP
  - Questions for each control measure

UDOT's Audit Experience
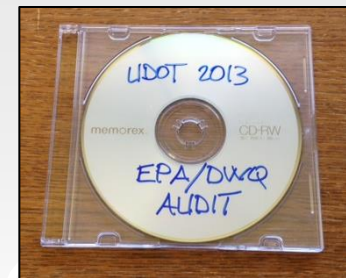
Managing Documents Collected:

- Hard Copies
  - Full 3 inch binder, double sided
  - 1 copy provided to audit team
  - 1 copy for our records

- CDs
  - 1 CD for each audit team member
  - 1 CD for our records

UDOT's Audit Experience

- Monday
  - Program Overview by UDOT
  - Construction Site Storm Water Mgt.
  - Post Construction Controls

- Tuesday
  - IDDE & Dry Weather Screening
  - MS4 Pollution Prev./Good housekeeping
  - Wet Weather Monitoring

- Wednesday & Thursday – Field Visits

- Friday – Close Out Meeting

UDOT's Audit Experience

- **How Did We Do?**
  - EPA: "We can't say; it will be in the report".
  - EPA's Final Report still being prepared

- **EPA May Ask Follow-up Questions**
  - March 2014: EPA sent additional questions to UDOT Regions.
  - Questions were similar to the Audit but were directed to each Region.

Lessons Learned

- Review your MS4 Permit often!

- Ensure that you and Permit regulators have a <u>shared</u> understanding of Permit language and Audit questions.

- Document compliance with your Permit

  – Especially your strengths!

- Provide evidence of oversight/enforcement.

- Store site inspection reports electronically.

  – Know where to find them!

Lessons Learned

- Pay attention to the "little things"
    - Schedule the meeting rooms when you receive the Audit agenda
    - Schedule adequate time for staff to prepare and participate
    - Provide adequate notice to field staff regarding site visits
    - Tell everyone to relax!

- DOT staff should accompany the Audit team on project site visits.

*"The best way out is always through"* – Robert Frost

EPA Audit Preparation

Tools & Techniques

Jerry Chaney, Utah DOT

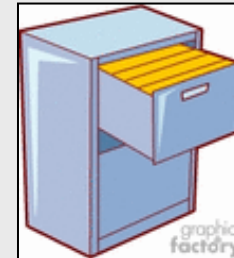# Audit Preparation - Tools & Techniques

- Not yet received an Audit notice?
  - Review EPA questions from previously audited DOTs
    - How would your DOT respond?
    - Be ready!

- Received your Audit notice?
  - Meet with your staff and develop:
    - A plan describing who will be involved in developing responses to questions (share the fun!)
    - A schedule with milestone dates "begin with the end in mind"
    - A schedule of "check-in" meetings and progress reports
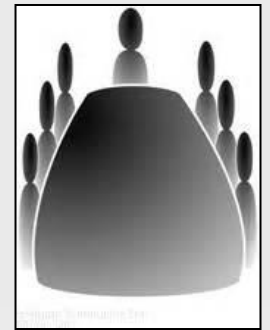
Audit Preparation - Tools & Techniques

- Review EPA's list of requested documents:
  - Your existing documents may already address EPA's questions:
    - Manuals of Instruction (MOIs) – Extract applicable sections
    - Design, construction and maintenance processes/procedures
    - DOT Policies and Permits
    - Stormwater Management Plans
    - Spill Response Plans
    - Stormwater Pollution Prevention Plans
    - Inspection records – Construction sites and maintenance stations
    - Enforcement actions taken by the DOT :
      - Construction site erosion/sediment control issues
      - Discovery and elimination of illicit discharges

Audit Preparation - Tools & Techniques

- Document management systems and databases help in collecting and compiling information.

- During the Audit, show examples of how information is stored and shared.

  - SWPPP documents

  - Construction site inspection reports

  - Maintenance activities

  - GIS Programs

    - Storm Drain Systems
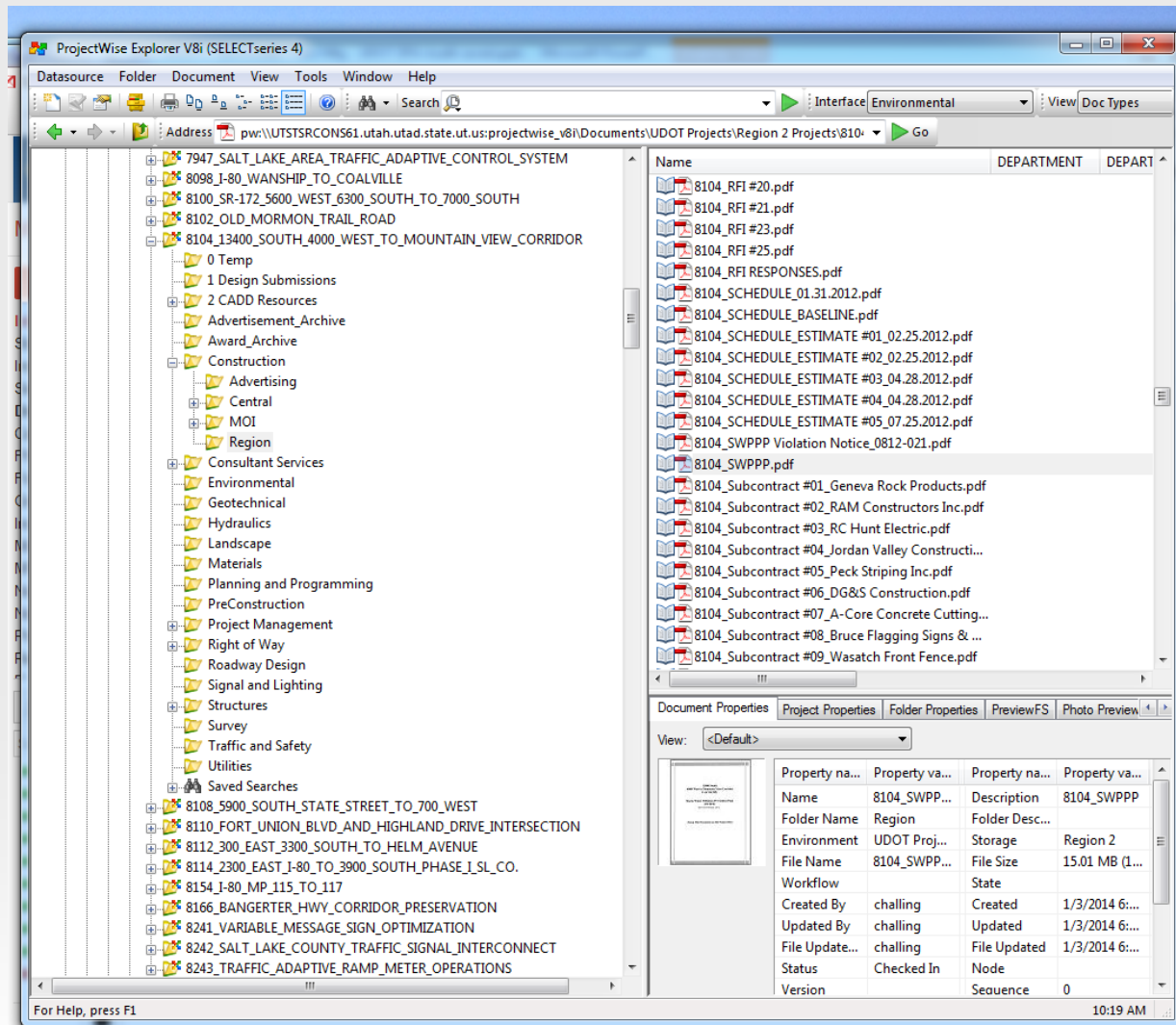
    - Post construction controls

udot.utah.gov

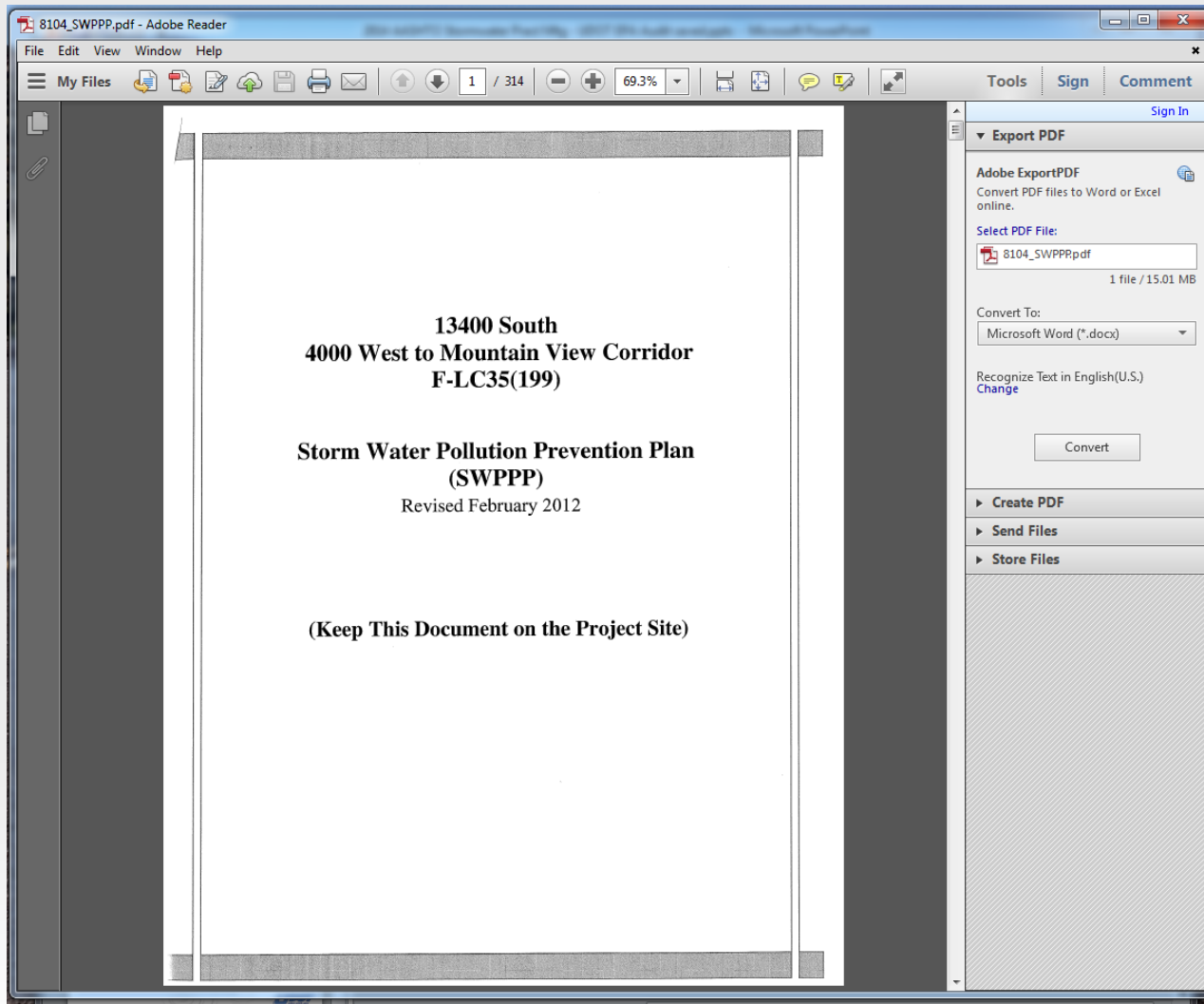# Audit Preparation - Tools & Techniques

Prepare "show and tell" examples for the Audit:

- "ProjectWise" Document Management System
  - Used for storing project documentation including:
    - CADD files
    - Advertised plans and specifications
    - Approved environmental studies/mitigation commitments
    - Applicable Permits/SWPPP documents
    - Construction site inspection reports and corrective actions

ProjectWise Document Management System

Project SWPPP Document

Weekly Inspection Reports & Corrective Actions

Viewing reports electronically is much easier than going through boxes of files!

Audit Preparation - Tools & Techniques

"Show and tell" example:

- UDOT Operations Management System (OMS) Database
  - Used for documenting statewide maintenance activities:
    - Litter removal
    - Detention/retention pond maintenance
    - Street sweeping
    - Catch basin cleaning
    - Erosion repairs

Operations Management System (OMS)

Adopt-A-Highway Program

UDOT Adopt-A-Highway Program - 2014							
Administrative Unit	**Amount**	**Activity**	**Labor Cost ($)**	**WO Status**	**Completion Date**	**Date Updated**	**WO#**
1436 - Logan	10.	7S38 - ADOPT-	$152	Completed	6/17/2014	6/17/2014	338995
1437 - Laketown		7S38 - ADOPT-A-HIGHWAY		Active		6/17/2014	338976
1435 - Wellsville	4.	7S38 - ADOPT-	$129	Completed	6/13/2014	6/13/2014	338664
4461 - Mt Pleasant	8.	7S38 - ADOPT-	$240	Completed	6/12/2014	6/12/2014	338531
2435 - Silver Summit	2.	7S38 - ADOPT-	$79	Completed	6/12/2014	6/12/2014	338465
1426 - Morgan		7S38 - ADOPT-A-HIGHWAY		Active		6/11/2014	338248
2424 - Salt Lake West	4.	7S38 - ADOPT-	$352	Completed	6/5/2014	6/5/2014	337601
4453 - Moab	4.	7S38 - ADOPT-	$104	Completed	6/5/2014	6/5/2014	337484
2435 - Silver Summit	4.	7S38 - ADOPT-	$736	Completed	6/4/2014	6/4/2014	337298
1437 - Laketown	4.	7S38 - ADOPT-	$143	Completed	6/5/2014	6/5/2014	337254
1425 - Huntsville	5.	7S38 - ADOPT-	$598	Completed	6/9/2014	6/9/2014	337214
4468 - Junction	8.	7S38 - ADOPT-	$291	Completed	6/6/2014	6/6/2014	337210
1433 - Riverside	10.	7S38 - ADOPT-	$86	Completed	6/10/2014	6/10/2014	337196
2427 - Salt Lake South	40.	7S38 - ADOPT-	$663	Completed	6/3/2014	6/3/2014	337147
1436 - Logan	20.	7S38 - ADOPT-	$139	Completed	6/3/2014	6/3/2014	336879
1436 - Logan	6.	7S38 - ADOPT-	$139	Completed	6/3/2014	6/3/2014	336864
1435 - Wellsville	6.	7S38 - ADOPT-	$129	Completed	5/30/2014	5/30/2014	336726
4457 - Emery	15.	7S38 - ADOPT-	$376	Completed	6/5/2014	6/5/2014	336717
2444 - Signs & Guardrail Crew		7S38 - ADOPT-	$1,869	Completed	6/6/2014	6/6/2014	336701
4483 - Delta	7.	7S38 - ADOPT-	$65	Completed	6/5/2014	6/5/2014	336531
1437 - Laketown	4.	7S38 - ADOPT-	$259	Completed	6/2/2014	6/2/2014	336370
2437 - Kamas	4.	7S38 - ADOPT-	$234	Completed	5/27/2014	5/27/2014	336256
2435 - Silver Summit	2.	7S38 - ADOPT-	$233	Completed	5/23/2014	5/23/2014	336127
1435 - Wellsville	4.	7S38 - ADOPT-	$129	Completed	5/23/2014	5/23/2014	336102
1425 - Huntsville	2.	7S38 - ADOPT-	$120	Completed	5/27/2014	5/27/2014	336077
2424 - Salt Lake West	4.	7S38 - ADOPT-	$328	Completed	5/22/2014	5/22/2014	336047
3437 - Vernal	5.	7S38 - ADOPT-	$265	Completed	5/22/2014	5/22/2014	335796
1433 - Riverside	9.5	7S38 - ADOPT-	$215	Completed	5/23/2014	5/23/2014	335599
1422 - Ogden	2.	7S38 - ADOPT-	$118	Completed	5/22/2014	5/22/2014	335550
4456 - Huntington	2.	7S38 - ADOPT-	$525	Completed	5/27/2014	5/27/2014	335423
1437 - Laketown	4.	7S38 - ADOPT-	$114	Completed	5/23/2014	5/23/2014	335354
1435 - Wellsville	4.	7S38 - ADOPT-	$172	Completed	5/22/2014	5/22/2014	335322
1435 - Wellsville	4.	7S38 - ADOPT-	$172	Completed	5/22/2014	5/22/2014	335309
1435 - Wellsville	3.	7S38 - ADOPT-	$129	Completed	5/15/2014	5/15/2014	334802

udot.utah.gov
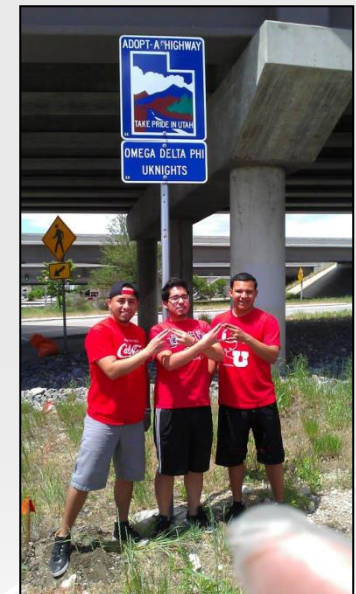
Detention Pond Maintenance

Detention Pond Maintenance - 2014							
Administrative Unit	Activity	Amount	Man Hour Used	Labor Cost ($)	WO Status	Completion Date	Date Updated
2432 - Murray	7D58 - DETENTION POND	3.	40.	$1,202	Completed	3/12/2014	3/12/2014
2431 - West Jordan	7D58 - DETENTION POND	2.	30.	$1,002	Completed	1/29/2014	1/29/2014
1424 - Clearfield	7D58 - DETENTION POND	1.	20.	$725	Completed	3/17/2014	3/17/2014
2431 - West Jordan	7D58 - DETENTION POND	4.	30.	$932	Completed	2/12/2014	2/12/2014
1424 - Clearfield	7D58 - DETENTION POND	1.	44.	$1,937	Completed	3/10/2014	3/10/2014
2424 - Salt Lake We:	7D58 - DETENTION POND	13.	13.	$616	Completed	1/7/2014	1/7/2014
2432 - Murray	7D58 - DETENTION POND	3.	28.	$773	Completed	2/12/2014	2/12/2014
1424 - Clearfield	7D58 - DETENTION POND	1.	26.	$1,116	Completed	3/10/2014	3/10/2014
2431 - West Jordan	7D58 - DETENTION POND	1.	40.	$1,029	Completed	1/31/2014	1/31/2014
1424 - Clearfield	7D58 - DETENTION POND	1.	20.	$725	Completed	3/17/2014	3/17/2014
1424 - Clearfield	7D58 - DETENTION POND	1.	34.	$1,188	Completed	3/17/2014	3/17/2014
1424 - Clearfield	7D58 - DETENTION POND	1.	58.	$2,111	Completed	3/17/2014	3/17/2014
1424 - Clearfield	7D58 - DETENTION POND	1.	2.	$81	Completed	3/17/2014	3/17/2014
2432 - Murray	7D58 - DETENTION POND	3.	20.	$689	Completed	5/1/2014	5/1/2014
2424 - Salt Lake We:	7D58 - DETENTION POND	6.	76.	$2,640	Completed	2/1/2014	2/1/2014
2431 - West Jordan	7D58 - DETENTION POND	1.	40.	$1,332	Completed	1/30/2014	1/30/2014
1431 - Snowville	7D58 - DETENTION POND	2.	40.	$1,222	Completed	5/12/2014	5/12/2014
2430 - Salt Lake Cer	7D58 - DETENTION POND	1.	15.	$487	Completed	3/6/2014	3/6/2014
2432 - Murray	7D58 - DETENTION POND	1.	3.	$97	Completed	3/27/2014	3/27/2014
4467 - Hanksville	7D58 - DETENTION POND MAINTENAN	.		$0	Completed	3/10/2014	3/10/2014
2432 - Murray	7D58 - DETENTION POND	3.	10.	$255	Completed	4/28/2014	4/28/2014
2432 - Murray	7D58 - DETENTION POND	1.	30.	$911	Completed	3/11/2014	3/11/2014
2431 - West Jordan	7D58 - DETENTION POND	3.	17.	$461	Completed	2/12/2014	2/12/2014
2431 - West Jordan	7D58 - DETENTION POND	1.	12.	$286	Completed	1/29/2014	1/29/2014
2431 - West Jordan	7D58 - DETENTION POND	1.	18.	$429	Completed	1/29/2014	1/29/2014
1424 - Clearfield	7D58 - DETENTION POND	1.	33.	$923	Completed	3/25/2014	3/25/2014
2427 - Salt Lake Sou	7D58 - DETENTION POND	1.	3.	$143	Completed	5/12/2014	5/12/2014
2427 - Salt Lake Sou	7D58 - DETENTION POND	2.	18.	$814	Completed	5/15/2014	5/15/2014
2431 - West Jordan	7D58 - DETENTION POND	4.	20.	$698	Completed	6/16/2014	6/16/2014
2435 - Silver Summit	7D58 - DETENTION POND	2.	29.	$929	Completed	5/28/2014	5/28/2014
1433 - Riverside	7D58 - DETENTION POND MAINTENANCE (EA - EACH)				Active		6/18/2014
				$25,752			
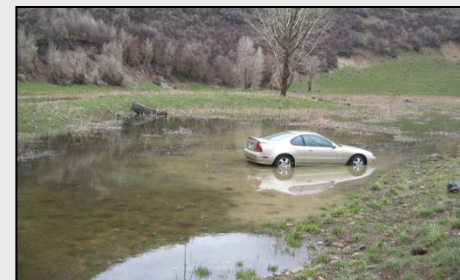
UDOT "UPLAN" GIS Mapping Platform

Final "show and tell" example:

UDOT Statewide Culvert Map