

Preparation of the Stormwater Assessment Section  
of the  
Technical Summary Report (TSR)

Information

The Michigan Department of Transportation (MDOT) is authorized to discharge stormwater from its regulated Municipal Separate Storm Sewer System (MS4) to surface waters of the state in accordance with an individual National Pollutant Discharge Elimination System MS4 permit. As a condition of the permit, MDOT is required to implement and enforce a program to prohibit and effectively eliminate illicit discharges to its regulated MS4.

An illicit discharge means any discharge to, or seepage into, a separate storm sewer that is not composed entirely of stormwater or uncontaminated groundwater. Sites where Environmental License Agreements (ELAs) are being required may an illicit discharge into MDOT's system.

To comply with the requirements of MDOT's MS4 permit a well-documented stormwater assessment must be provided for each ELA application submitted to MDOT. This assessment shall contain information and data to support assumptions made regarding any potential impact to MDOT's stormwater system. If detailed information is not submitted the application will not be processed by MDOT. The requirements for the assessment are identified in the information listed below.

MDOT staff will review the application package, including the general information in the stormwater assessment section, as part of the construction risk review for MDOT. If there are no impacts to MDOT's stormwater system, including ditches and stormwater facilities the application will be processed under regular procedures. For example regular procedures would apply if contaminated ground water is beneath all utilities, or the stormwater system is not within the "Area of Contamination". If a potential or known impact is noted, the stormwater assessment section will be reviewed by MDOT and may require additional license conditions on the ELA. MDEQ, Remediation and Redevelopment Division (RRD), will audit/review risk based closure reports (CR), no further action (NFA), reports for impact to waters of the state, including impacts to stormwater as part of the ELA. MDEQ, RRD, will audit/review all CRs/NFA reports that contain a MDOT ELA involving a MS4 stormwater system. MDEQ, RRD, will inform MDOT as to whether a CR/NFA report meets the risk based criteria for the protection of waters of the state and if the CR/NFA report was approved or denied. Additionally, MDEQ, RRD will determine if the contamination is naturally attenuating over time.

Additional License Conditions that May Be Required

Based on the statements and data provided in this section, MDOT may put a conditional license statement in the license conditions section (Form 3760B) part of the ELA. This special condition

would only be utilized when there is a potential or known source of contamination affecting MDOT's stormwater system. If there is no impact to MDOT's stormwater system, as provided for in the TSR, this statement will not appear. The statement will indicate the following:

Insert actual language from condition document once final

#### Section format and required information

The stormwater assessment section format shall include the following:

1. Have an initial statement indicating whether or not there is an impact to MDOT's stormwater system or compliance with MDOT's permit.
2. An executive summary describing no impact, potential impact, or known contaminant in MDOT's stormwater system. The executive summary shall contain a description, maps, and figures as an explanation of issues. Maps, data, figures, and tables can be reference in the summary but need to be attached is a separate Appendix. All determinations must be supported by the data provided.

#### Additional information, terms, and definitions.

MDOT's stormwater system includes storm sewers, open ditches, culverts, other conveying mechanisms, and storage or treatment features.

MDOT's discharge points could be to lakes, streams, rivers, creeks, county drains, and ditches. The applicant needs to provide the discharge point as part of description of potential or known impacts.

"Closure Reports" are referenced in Part 213 regulations.

"No further action reports" are referenced in Part 201 regulations

MDOT "construction risk review" determines if there are any additional costs, time, or worker safety issues that MDOT would have to deal with regarding construction, maintenance activities, or other MDOT activities that might occur within the MDOT right of way.