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Colorado Department of Transportation's Approach to the NPDES Permit for Stormwater Discharges

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On November 16, 1990 the Environmental Protection Agency published in the Federal Register the National Pollutant Discharge Elimination System (NPDES) regulations for stormwater discharges. These regulations establish the framework to apply for the NPDES permit for municipal and industrial stormwater discharges. The NPDES program in Colorado is administered by the Colorado Department of Health (CDH).

In regard to the NPDES municipal permit, stormwater discharges from the Colorado Department of Transportation's (CDOT's) Right-of-Way (ROW) are interrelated with discharges from the municipalities; for this reason, CDOT is required to apply for a NPDES permit for municipal stormwater discharges.

On May 15, 1992, CDOT submitted Part 1 of the municipal NPDES permit application to CDH. This application covers stormwater discharges from CDOT's ROW within the cities of Denver, Lakewood, Aurora, and Colorado Springs. The cities mentioned above are those in Colorado with a population over 100,000 which, therefore, are required to apply for the NPDES permit for municipal discharges.

In regard to the NPDES permit for construction activities, because of the numerous CDOT construction activities throughout the state (approximately 200 statewide construction projects per year), particular emphasis has been given to this permit. CDOT created a "NPDES Construction Task Force" with members from different organizations within the Department. This Task Force determined and recommended that a statewide NPDES stormwater permit for CDOT's construction activities would be the most advantageous approach. CDOT submitted to CDH a proposed statewide NPDES permit for CDOT's construction activities on December 1991. At this time this permit is under review by CDH. Until some type of CDOT permit is approved and issued, CDOT will seek coverage under the "General Permit for Stormwater Discharges Associated with

Construction Activities" issued by CDH on August 18, 1992.

CDOT roadway designers, with the support of CDOT's Hydraulics and Landscape units (or a consultant), will determine appropriate BMPs and prepare a Stormwater Management Plan (SWMP) for each construction project that requires the NPDES permit. Erosion control and stormwater quality management measures devised as part of the SWMP will be included in the construction plans with the appropriate pay items.

The above procedure is part of CDOT's program that is being implemented to control and minimize pollutants in stormwater discharges from CDOT's construction activities and from highway runoff. This program is a result of the NPDES regulations and, in summary, some of its key points are:

- Preparation of a SWMP for CDOT's construction projects.
- Inclusion of erosion control pay items in the bid documents.
- Minimize erosion through non-structural and structural BMP's.
- Minimize extent and duration of disturbed areas.
- Dispose of and store properly construction and waste material.

Also as part of CDOT's program, CDOT is revising and updating its "Erosion Control Manual" and its "Standard Specifications for Road and Bridge Construction". In the future, CDOT will implement workshops to train its personnel in proper application, design, inspection, and maintenance of BMP's for erosion control and stormwater quality management.

CDOT is also taking a closer look at its maintenance activities; CDOT is evaluating the appropriate measures that need to be taken to reduce pollution that results from these maintenance activities.

CDOT is aware of the need to reduce pollutants from construction and highway runoff, and the importance of the NPDES stormwater regulations. CDOT will comply with the NPDES stormwater regulations and will take all the necessary steps to help provide a better environment.