

Maine Department of Transportation Municipal Separate Storm Sewer Systems General Permit Annual Report PY5 September 15, 2018

(Revised November 5, 2018)



Underdrained filter ditch.

Permit MER043000 Permittee MER043002

Table of Contents

Introduction and Summary	1
MCM 1. Public Education and Outreach on Stormwater Impacts	1
BMP 1.1 Raise awareness among employees and contractors by providing training on reducing polluted stormwater runoff	2
BMP 1.2 Motivate staff and contractors to utilize BMPs that minimize stormwater pollution	3
BMP 1.3 Provide training on reducing polluted stormwater runoff	3
Fifth year assessment of process indicators and impact indicators	3
MCM 2. Public Involvement and Participation	4
BMP 2.1 Public notice requirements.	4
BMP 2.2 Coordinate with regulated communities.	4
MCM 3. Illicit Discharge Detection and Elimination	5
BMP 3.1 Update the watershed based mapping of the stormwater system.	5
BMP 3.2 Conduct coordinated dry weather inspections of outfalls in urban impaired stream watersheds or other high priority watersheds	5
BMP 3.3 Continue to implement MaineDOT's strategy for detecting illicit discharges to open ditch systems within the two highest priority watersheds.	5
BMP 3.4 Continue to implement illicit discharge detection and elimination procedure policy.	6
BMP 3.5 Continue system of tracking potential illicit discharges.	6
MCM 4. Construction Site Stormwater Runoff Control	6
BMP 4.1 Continue to implement soil erosion and water pollution control plan requirements	6
MCM 5. Post-Construction Stormwater Management in New Development and Redevelopment	7
BMP 5.1 Develop, implement, and enforce a program to address stormwater runoff from new development and redevelopment projects that have an acre or more of land disturbance that discharge into the MS4 or directly into waters of the State other than groundwater	
BMP 5.2 Include a combination of structural and/or non-structural BMPs	8
BMP 5.3 Develop an inspection program including inspection of BMPs at least once during the first year of installation.	8
MCM 6. Pollution Prevention and Good Housekeeping in Facility Operations	9

Ρ	rogram Audit	.11
	BMP 6.7 Continue to implement stormwater pollution prevention plans for vehicle maintenance facilities within the regulated MS4 areas	.11
	BMP 6.6 Continue program to repair or upgrade stormwater conveyances.	.10
	BMP 6.5 Continue program to clean catch basins and other stormwater structures	
	BMP 6.4 Continue parking lot and street sweeping program	.10
	BMP 6.3 Continue employee training program to reduce stormwater pollution from facilities.	.10
	BMP 6.2 Continue to implement procedures for maintenance of stormwater controls at maintenance facilities.	9
	BMP 6.1 Continue to inventory potential pollution sources and associated operations conducted in, on, or associated with facilities, buildings, roads, and travelways that have the potential to cause or contribute to stormwater or surface water pollution	

Introduction and Summary

In accordance with the reporting requirements specified in Part IV. J. 1. of the General Permit for the Discharge of Stormwater from Maine Department of Transportation and Maine Turnpike Authority Municipal Separate Storm Sewer Systems, MaineDOT provides this report for Permit Year 5 (PY5).

MaineDOT continues to achieve the measurable goals identified in the MaineDOT Stormwater Program Management Plan (SPMP), described below in Minimum Control Measures 1 through 6. A copy of the MaineDOT SPMP is on file at the Maine DEP Office in Augusta.

MaineDOT conducted quarterly visual water quality monitoring at both vehicle maintenance facilities located in MS4 urbanized areas (Scarborough and Bangor). Visual Monitoring Forms were completed and are kept on file with the facility's SWPPP; digital copies are kept in the MaineDOT Environmental Office, Surface Water Quality Unit, MS4 files in Augusta. No other water quality monitoring was conducted or required.

In the next reporting cycle, MaineDOT will continue to make improvements to its infrastructure maps by verifying outfall locations and direction of flow between catch basins; and anticipates confirming the locations of interconnected stormwater infrastructure with other regulated entities.

MaineDOT has not made any changes to the goals identified in the Stormwater Program Management Plan.

This report includes a description of the actions completed for the measurable goals of each BMP identified in the MaineDOT SPMP for each Minimum Control Measure in the General Permit. BMPs for all of the MCMs were completed successfully in PY5.

MCM 1. Public Education and Outreach on Stormwater Impacts

Goals

- 1. Raise awareness among employees and contractors that polluted stormwater runoff is the most significant source of water quality problems for Maine's waters.
- 2. Motivate staff and contractors to use BMPs to reduce polluted stormwater runoff.
- Reduce polluted stormwater runoff as a result of increased awareness and use of BMPs.

BMP 1.1 Raise awareness among employees and contractors by providing training on reducing polluted stormwater runoff.

MaineDOT provides erosion and sedimentation and water pollution control training to employees and contractors annually.

In PY5, MaineDOT provided two four-hour Erosion and Sedimentation Control classes for MaineDOT employees; one two-day Project Development Construction Training sessions; and assisted the DEP Nonpoint Source Resource Training Center (NPSTC) in conducting Basic and Advanced Erosion and Sedimentation Control Practices training for contractors at sessions across the State.

<u>MaineDOT Employees and Contractors:</u> MS4 urbanized areas are located only in MaineDOT Regions 1 and 4 (Portland area, south, and the greater Bangor area). This training is further described below and relevant documentation is retained on file.

- On February 6, 2018, 43 MaineDOT employees attended a 4-hour erosion and sedimentation control training session at the MaineDOT Training Center in Fairfield; 17 of the 43 employees work on projects in MS4 Urbanized Areas. A test is given at the end of these training sessions; employees are expected to be able to correctly describe sources of stormwater pollution, proper maintenance of BMPs, and why they're important.
- On June 14, 2018, 46 MaineDOT employees attended a 4-hour erosion and sedimentation control training session at the MaineDOT Training Center in Fairfield; 14 of the 46 employees work on projects in MS4 Urbanized Areas. A test is given at the end of these training sessions; employees are expected to be able to correctly describe sources of stormwater pollution, proper maintenance of BMPs, and why they're important.
- On March 28, 2018, 22 consultants and contractors, and 12 MaineDOT employees attended the second day of a two-day Project Development Construction Training in Hallowell. This included a 1-hour session on Erosion and Sedimentation Control and MS4 Awareness and Responsibilities.

Maine DEP NPSTC: In PY5, between October, 2017 and May, 2018, a total of 682 contractors attended DEPs Basic and Advanced Erosion and Sedimentation Control Practices and Continuing Education training sessions at various locations across the State. Only some of the contractors who took the training will potentially work on MaineDOT projects in MS4 urbanized areas. In the Fall of 2017, a MaineDOT Environmental Engineer provided the NPSTC training material for a continuing education program in Good Housekeeping on construction sites and reviewed presentation.

BMP 1.2 Motivate staff and contractors to utilize BMPs that minimize stormwater pollution.

MaineDOT requires employees and contractors to use erosion and sedimentation control BMPs to minimize the effects of stormwater runoff. Regardless of area disturbed, all MaineDOT projects that have soil disturbance are required to have a Soil Erosion and Water Pollution Control Plan (SEWPCP) reviewed and approved by authorized MaineDOT Environmental Office staff specializing in erosion and sedimentation control compliance. These field staff inspect construction projects for compliance with the SEWPCP. MaineDOT's Best Management Practices for Erosion and Sedimentation Control Manual is posted on MaineDOT's webpage.

BMP 1.3 Provide training on reducing polluted stormwater runoff.

MaineDOT provides training on erosion and sedimentation control at least annually to ensure employees and contractors are continually motivated to use the appropriate erosion and sedimentation control BMPs on their projects. See BMP 1.1 and 1.2 above.

MaineDOT is a member of the Maine DEP Nonpoint Source Training and Resource Center Advisory Committee which meets semi-annually to make decisions on providing training to contractors. MaineDOT provides ESC specialists to assist DEP in presenting the Basic and Advanced Erosion and Sedimentation Control Practices training.

Fifth year assessment of process indicators and impact indicators.

The MaineDOT has been committed to protecting the surface water resources of the state for over 20 years; during that period of time we provided annual training to our staff, contractors, and consultants in erosion and sedimentation control, dust control, and spill prevention and response during the construction process and during our drainage system maintenance statewide. All construction and maintenance projects are required to have a Soil Erosion and Water Pollution Control Plan (SEWPCP). In 2006, our M&O Bureau implemented an environmental stewardship program and published the Environmental Policies and Procedures. As noted in MCM 6, all maintenance crews participate in annual Green Book training (based on the EPP) on hazardous waste and materials, spill prevention and response, and material handling.

Awareness, motivation, and knowledge of a process coalesces through implementation of that process. In implementation of the SEWPCP, the MaineDOT does not distinguish between projects that are inside or out of the MS4 or within an Urban Impaired Stream watershed. As noted above, the MaineDOT requires that all construction and maintenance projects have a SEWPCP, and the same standards are applied statewide.

The additional MaineDOT training for the MS4 permit and program covers the MS4 General Permit conditions and requirements, the municipality responsibilities and their rights to review our projects, and IDDE (MCM3) inspections, discovery, and processing. M&O field staff are the primary focus of training; however, MaineDOT provides this

training to construction contractors and consultants as well. In addition to the training we provide our highway workers, all MaineDOT projects and maintenance camps have a Crew Leader/Supervisor on site, who is trained and well versed in these requirements.

Each MaineDOT region has a Regional Environmental Coordinator, who is responsible for environmental permit processing and compliance. They work intimately with the M&O staff in their activities and oversee environmental compliance. The Region 1 and 4 (MS4 area) coordinators have one-on-one training from the Surface Water Quality Unit in MCMs 2-6 to help implement the requirements in these regions. In our 5th year assessment, we have determined that MaineDOT staff continues to incorporate these long-standing procedures to protect surface water resources statewide, including erosion and sedimentation control, spill prevention and response, and good housekeeping at the maintenance camps. The addition of the MS4 permit and program has raised the awareness and emphasized IDDE and that has been integrated into the standard procedures.

MCM 2. Public Involvement and Participation

Goals

Involve the MaineDOT community including various Bureaus or facilities in both the planning and implementation process of improving water quality and reducing water quantity via the stormwater program.

BMP 2.1 Public notice requirements.

MaineDOT holds public meetings for construction projects and publishes meeting information, including the location, date, and time of the meeting, in local newspapers serving the project area. Attendance varies greatly; attendance and public comments are recorded and kept on file.

BMP 2.2 Coordinate with regulated communities.

The MaineDOT 2017-2018-2019 Interactive Work Plan was emailed to the MS4 municipal stormwater coordinators on August 3, 2017. That Work Plan covers PY5. A brief explanation of how to use the Interactive Work Plan and a description of what it includes was given to the members of Southern Maine Stormwater Work Group at their July 26, 2017 meeting, and to the members of Bangor Area Stormwater Work Group at their August 10, 2017 meeting.

In PY5, MaineDOT maintained regular contact with the regulated MS4 municipalities by participating in the meetings of the Bangor Area Stormwater Working Group, and the Southern Maine Stormwater Work Group.

MaineDOT continues to provide funding to the Bangor Area Stormwater Work Group in support of their education and outreach activities. On May 18, 2018 the Bangor Area Stormwater Work Group requested \$300 for in-bus signage for PY5, which MaineDOT

agreed to contribute; MaineDOT did not receive an invoice until after the PY5 reporting period.

MCM 3. Illicit Discharge Detection and Elimination

Goals

Develop, implement, and enforce a program to detect and eliminate illicit discharges and non-stormwater discharges in MaineDOT's stormwater systems.

BMP 3.1 Update the watershed based mapping of the stormwater system.

In PY5, MaineDOT updated its MS4 outfall maps to reflect the following new information.

The MaineDOT catch basin inventory was updated with 10 new catch basins on Route 1 in South Portland and Scarborough. The catch basins were installed by MaineDOT as a Capital Improvement project; the catch basins are located in the State Urban Compact and maintenance responsibilities lies with the cities. The city engineers and stormwater coordinators for both municipalities were informed of the project and the new catch basins in January 2018.

Three new catch basins on River Road in Windham were added to the MaineDOT catch basin inventory in February 2018.

BMP 3.2 Conduct coordinated dry weather inspections of outfalls in urban impaired stream watersheds or other high priority watersheds.

The MaineDOT dry weather inspections in urban impaired stream watersheds were delayed in PY5 due to staffing changes within the Department. MaineDOT conducted dry weather inspections in urban impaired stream watersheds in Westbrook and Hampden immediately following the closure of the PY5 reporting period (in August 2018). Details regarding the inspections will be included in the subsequent 2019 report.

BMP 3.3 Continue to implement MaineDOT's strategy for detecting illicit discharges to open ditch systems within the two highest priority watersheds.

MaineDOT Surface Water Quality staff inspected open ditch systems in two high priority watersheds while conducting dry weather inspections of outfalls, shortly after the reporting period ended (in August 2018).

MaineDOT Maintenance & Operations Transportation Workers inspect ditches on a regular basis as part of normal M&O duties; this work is statewide, not limited to high priority watersheds or urbanized areas. Potential illicit discharges are reported up the chain of command for resolution. In PY5, no potential illicit discharges within MS4 urbanized areas located in Regions 1 and 4 were reported during ditch maintenance;

this information was verified by personal communication in August and September 2018.

BMP 3.4 Continue to implement illicit discharge detection and elimination procedure policy.

The MaineDOT Bureau of Maintenance and Operation's Illicit Discharge Detection and Elimination Policy specifies the steps to take upon discovery of an illicit discharge. The policy is implemented statewide, not just in the regulated MS4 urbanized areas.

No illicit discharges were reported in any of the regulated MS4 urbanized areas located in Regions 1 and 4 per the policy in PY5; this information was verified by personal communication in August and September 2018.

BMP 3.5 Continue system of tracking potential illicit discharges.

The MaineDOT Illicit Discharge Detection and Elimination Policy contains a section on tracking potential illicit discharges. Potential illicit discharges are reported up the supervisory chain and to the MaineDOT Environmental Office Surface Water Quality Unit and logged for tracking and reporting purposes.

In PY5 no potential illicit discharges were reported in regulated MS4 urbanized areas located in Regions 1 and 4.

MCM 4. Construction Site Stormwater Runoff Control

Goals

Continue to implement and enforce MaineDOT's program to reduce pollutants in stormwater runoff from construction activities that result in a land disturbance of one acre or more.

BMP 4.1 Continue to implement soil erosion and water pollution control plan requirements.

MaineDOT continues to implement and enforce an Erosion and Sedimentation Control Program to reduce pollutants in stormwater runoff from its construction activities. MaineDOT's Standard Specification 656 requires a Soil Erosion and Water Pollution Control Plan (SEWPCP) to be developed by project contractors; the SEWPCPs are reviewed and approved by MaineDOT Surface Water Quality Unit staff specializing in erosion and sedimentation control prior to the start of construction. Inspections are done at various times throughout construction until completion of the project and stabilization of the construction area. As part of MaineDOT's stormwater Memorandum of Agreement with Maine DEP, MaineDOT implements the SEWPCP requirement for all projects that have soil disturbance, regardless of the amount of disturbance.

In PY5, MaineDOT started construction on 32 projects within the MS4 areas. One project had an acre or more of disturbance in an MS4 regulated urbanized area; Orono, Route 2/Rangeley Rd. Roundabout.

Each project has an erosion and sedimentation control plan that was reviewed and approved by MaineDOT Environmental Office, Surface Water Quality Unit staff.

The roundabout project in Orono began construction in March of 2018 and was not completed in PY5, but it was inspected five times in PY5 for compliance with the project SEWPCP. Only minor refreshing of mulching was required.

Construction on the Sarah Mildred Long Bridge replacement project in Kittery, which began in PY2, was completed in May 2018. In PY5, the construction site was inspected on four separate occasions between September 2017 and January 2018. From January until May 2018 the environmental field inspector took a position with the Bridge Bureau and was assigned to this project. He was onsite daily. Throughout PY5 the project was found in compliance with the project SEWPCP on each occasion.

Construction on the Sabattus highway project, which began in PY4, was completed in the December 2017. In PY5 the construction site was inspected twice. Both times, the inspector noted deficiencies in the temporary mulching. The Resident directed the contractor to correct these deficiencies.

Inspections on each of these projects are documented by the inspector; the inspector's files are digital and are stored both on the inspector's tablet and on a network drive; the files will be retained for at least three years.

MCM 5. Post-Construction Stormwater Management in New Development and Redevelopment

Goals

- Develop, implement, and enforce a program to address stormwater runoff from new development and redevelopment projects that have an acre or more of land disturbance.
- 2. Include a combination of structural and non-structural BMPs.
- 3. Develop an inspection program including inspection of BMPs at least once during the first year of installation.

BMP 5.1 Develop, implement, and enforce a program to address stormwater runoff from new development and redevelopment projects that have an acre or more of land disturbance that discharge into the MS4 or directly into waters of the State other than groundwater.

MaineDOT's Stormwater Program addresses stormwater runoff from new development and redevelopment projects through a Memorandum of Agreement between the Maine

DEP, the MaineDOT, and the Maine Turnpike Authority. All MaineDOT projects with land disturbance, regardless of size or location, are reviewed by MaineDOT Surface Water Quality Unit staff for compliance with the stormwater MOA requirements. The MOA requirements are based on DEP's Stormwater Standards (Chapter 500). Projects located in MS4 urbanized areas are further reviewed to determine if the amount of disturbance will be more or less than one acre. New development or redevelopment projects in an urbanized area with an acre or more of disturbance and a direct discharge of stormwater to the MS4 or to waters of the State other than groundwater have stormwater BMPs incorporated into the project.

In PY5, MaineDOT completed the construction of two projects with an acre or more of disturbance in an MS4 regulated urbanized area and having a stormwater discharge to an existing stormwater system or to waters of the State other than groundwater: Sabattus Route 126 and the Sarah Mildred Long bridge replacement project in Kittery.

Both the Sabattus Route 126 and Sarah Mildred Long bridge replacement projects required post-construction stormwater management. Construction of the Sabattus Route 126 reconstruction project was completed in December 2017. The Sarah Mildred Long bridge replacement project in Kittery was completed in May 2018.

BMP 5.2 Include a combination of structural and/or non-structural BMPs.

New Development and redevelopment projects located within MS4 urbanized areas that require stormwater treatment in accordance with the permit will include structural and/or non-structural BMPs.

The Sabattus Route 126 reconstruction project was completed on December 2, 2017. The reconstruction consisted of 1.94 miles of Route 126 and included 5,060 sq ft of new impervious area. The stormwater BMPs to treat the runoff from this new impervious area consists of 143 linear ft of underdrain ditch soil filter.

The Sarah Mildred Long bridge replacement project in Kittery was completed on May 24, 2018. The bridge replacement consisted of 3.7 acres of disturbance. Stormwater BMPs, consisting of two stormwater bio-retention basins, were installed to treat approximately 10,600 sq ft of the new impervious area.

BMP 5.3 Develop an inspection program including inspection of BMPs at least once during the first year of installation.

The stormwater BMPs for the Sabattus Route 126 reconstruction were inspected by MaineDOT in July 2018, after the PY5 reporting period. A summary of our findings will be provided in the 2019 report.

The stormwater BMPs for the Sarah Mildred Long bridge replacement project in Kittery were inspected in September 2018, after the PY5 reporting period. A summary of our findings will be provided in the 2019 report.

The cumulative number of functioning MaineDOT post construction stormwater BMPs discharging directly into waters of the State other than groundwater or into or from their separate storm sewer system, required by the MS4 permit is five.

The number of sites that required routine maintenance or remedial action to ensure that the post construction BMP is function as intended is zero.

MCM 6. Pollution Prevention and Good Housekeeping in Facility Operations

Goals

MaineDOT's goals are to prevent or reduce pollutant runoff from MaineDOT's roads, other infrastructure, and facilities through the development and implementation of an Operation and Maintenance Program.

BMP 6.1 Continue to inventory potential pollution sources and associated operations conducted in, on, or associated with facilities, buildings, roads, and travelways that have the potential to cause or contribute to stormwater or surface water pollution.

Potential sources of pollutants for MaineDOT operations include roads, maintenance garages, park and ride lots, and vehicle maintenance facilities.

Roads maintained by MaineDOT include the interstate and those sections of State and State Aid roads that are outside State Urban Compact boundaries.

MaineDOT has 9 maintenance camps located in MS4 urbanized areas. Maintenance camps do not conduct vehicle maintenance but do have buildings and parking areas.

MaineDOT is responsible for 11 park and ride lots located in MS4 urbanized areas.

As of PY5, MaineDOT has 2 Vehicle Maintenance Facilities in the regulated MS4 urbanized areas; one prior Vehicle Maintenance Facility no longer has any vehicle maintenance activities at the facility and has been removed from the list. Vehicle maintenance facilities may include storage and use of gasoline and diesel fuel, oil, hydraulic fluids, radiator fluid, brake fluid, and other related vehicle maintenance fluids; vehicle washing operations; sand/salt storage; and stockpiled materials.

BMP 6.2 Continue to implement procedures for maintenance of stormwater controls at maintenance facilities.

MaineDOT M&O staff inspect their facilities on a regular and frequent basis including inspection of erosion and sedimentation control and stormwater BMPs

BMP 6.3 Continue employee training program to reduce stormwater pollution from facilities.

MaineDOT maintenance facility staff receive Green Book training in November, December, January, and March each year. The Green Book is a MaineDOT environmental practices guidebook for M&O staff which covers the following topics: hazardous chemicals, universal waste, oil and equipment maintenance waste, hazardous waste, materials management, and spill prevention and response. In PY5, 38 employees who work in the MS4 in MaineDOT Region 1 and 19 employees who work in the MS4 in MaineDOT Region 4 attended Green Book training. A copy of the Green Book was included as Appendix B in the PY1 annual report submitted to DEP in September 2009.

Maintenance facility personnel also receive erosion and sedimentation control training annually; see BMP 1.1.

BMP 6.4 Continue parking lot and street sweeping program.

MaineDOT's Bureau of Maintenance and Operations has a program in place for sweeping roads and parking lots within the MaineDOT areas of responsibility. Each year over 7,500 miles are swept statewide by MaineDOT each spring to remove winter sand/salt deposits; this includes miles that were swept by MaineDOT maintenance crew and by hired contractors.

MaineDOT is responsible for 11 park and ride lots that are located within MS4 urbanized areas. Ten lots were swept in 2018 to remove winter salt and/or sand and debris. One lot is scheduled to be swept in the near future and will be swept at the appropriate time following snowmelt moving forward. All swept material is disposed of in accordance with all applicable state and federal laws and regulations.

BMP 6.5 Continue program to clean catch basins and other stormwater structures.

MaineDOT's Bureau of Maintenance and Operations has a program in place to regularly inspect, clean, maintain, repair, and replace catch basins and other stormwater structures. The M&O catch basin cleaning program is implemented statewide, not limited to MS4 urbanized areas. In PY5, in the MS4 Urbanized Areas of the State, which are located in Regions 1 and 4, 1175 catch basins were cleaned and 8.7 shoulder miles of roadside ditches received maintenance ditching by excavator or backhoe.

BMP 6.6 Continue program to repair or upgrade stormwater conveyances.

MaineDOT's Bureau of Maintenance and Operations assesses stormwater infrastructure for maintenance needs including repairs and replacements every other year. In PY5, 10 catch basins in MS4 urbanized areas were repaired or replaced: CB-

941814 in Auburn, CB-941821 in Auburn, CB-926732 in Portland, CB-926732 in Portland, CB-14275 in Saco, CB-963953 in Bangor, CB-1011016 in Brewer, CB-139599 in Hampden, CB-908890 in Hampden, and CB-139583 in Hampden.

BMP 6.7 Continue to implement stormwater pollution prevention plans for vehicle maintenance facilities within the regulated MS4 areas.

MaineDOT has 2 vehicle maintenance facilities located in MS4 urbanized areas: Bangor and Scarborough. Each of these vehicle maintenance facilities has a SWPPP that is updated as changes occur.

In PY5, the Bangor and Scarborough Maintenance Facilities received Quarterly Visual Monitoring and site inspections.

MaineDOT Vehicle Maintenance Facility staff receive ESC training annually (captured in BMP 1.1), MS4 awareness training bi-annually, and on-site Green Book training at least four months each year.

Program Audit

EPA conducted an audit of MaineDOT MS4 permit program on October 25th and 26th 2017. October 25th focused on program management, department organization, program organization, staff roles and responsibilities, training, record keeping, IDDE and other policies and procedures. October 26th focused on inspections of a construction site, post-construction BMPs, and MaineDOT maintenance facilities. In a post audit meeting on October 26th, EPA audit team leader stated that the MaineDOT MS4 program management and organization was very good; that record keeping was very good; that staff was good; that training was good; that IDDE was good but could use more clarity; that infrastructure mapping was good and long term improvements could include continuing to get and share mapping with municipalities; that the construction and post-construction programs were good and that MaineDOT could pursue combining MS4 GP and Construction GP with the MaineDOT/Maine DEP stormwater MOA; and that GH/PP was good. A letter from EPA dated December 7, 2017 states that while conducting the MS4 audit, they also observed that secondary containment for oil-filled containers at the Scarborough maintenance facility were inadequate or non-existent and needed to be corrected and the SPCC plan revised accordingly; this interpretation was subsequently reversed by EPA staff with 30 years of experience in EPA's Oil Spill Prevention Program.