



**IDAHO TRANSPORTATION DEPARTMENT**

600 W. Prairie Ave.  
Coeur d'Alene, ID 83815-8764

(208) 772-1200  
itd.idaho.gov

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February 3, 2020

U.S. EPA Region 10  
Office of Water  
Attn: Mr. Rob Grandinetti – NPDES Compliance Unit  
1200 6<sup>th</sup> Avenue (OW-130)  
Seattle, Washington 98101

Re: ITD D1 MS4 2019 Annual Report

Dear Mr. Grandinetti:

The Idaho Transportation Department, District 1 hereby submits the enclosed MS4 Permit No. IDS-028223 Annual Report for 2019 and certifies the following:

*"I certify under penalty of the law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties of submitting false information, including the possibility of fine and imprisonment for knowing violations."*

Please feel free to call me at 208-772-1200 if you have any questions or concerns regarding this report.

Sincerely,

Idaho Transportation Department

A handwritten signature in cursive script that reads "Jerry Wilson".

Jerry Wilson, P.E.  
Operations Manager

Cc: Idaho Department of Environmental Quality

Enclosure: ITD D1 MS4 2019 Annual Report

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**MUNICIPAL SEPARATE STORM SEWER SYSTEM  
(MS4)  
EPA NPDES PERMIT NO.: IDS-028223  
2019 ANNUAL REPORT**

**IDAHO TRANSPORTATION DEPARTMENT  
DISTRICT ONE  
Kootenai County  
Coeur d'Alene, Idaho**

**SUBMITTED BY:  
IDAHO TRANSPORTATION DEPARTMENT  
DISTRICT ONE**

**FOR THE REPORTING PERIOD:  
JANUARY 1, 2019 TO DECEMBER 31, 2019**

**FEBRUARY 3, 2020**

## **INTRODUCTION**

This Annual Report has been submitted by the Idaho Transportation Department District One (ITD) in response to reporting requirements set forth in Part IV.C of the EPA Permit #IDS-028223. This permit was issued by the Environmental Protection Agency (EPA) in compliance with the National Pollutant Discharge Elimination System (NPDES) regulations covering storm water discharges from ITD's Municipal Separate Storm Sewer System (MS4) located in Coeur d'Alene, Idaho. This report is hereby submitted to EPA and the Idaho Department of Environmental Quality (DEQ) to satisfy the permit reporting requirements for the Annual Report covering the period from January 1, 2019 through December 31, 2019. The purpose of this Annual Report is to document progress toward achieving the minimum control measures associated with the ITD D1 MS4, as identified by ITD D1's Stormwater Management Program (SWMP). The permit and MS4 documentation can be accessed on the ITD website.

## **MINIMUM CONTROL MEASURES IDENTIFIED BY THE SWMP**

### ***A. PUBLIC EDUCATION AND OUTREACH***

1. ITD Stormwater Training Opportunities – ITD offers instructor led training opportunities in stormwater management and sediment and erosion control. These courses satisfy the qualification requirements for stormwater inspectors on ITD projects. Six ITD-D1 staff completed the ITD stormwater inspector training (#3.07) in 2019. In addition, three ITD D1 staff completed ITD's environmental awareness training (#3.30) during the current reporting year.
2. ITD Stormwater Management, Sediment and Erosion Control Guidance - Ongoing updates were made to ITD's website relative to the subject of stormwater management during the past reporting period. The ITD website is used as the principal tool for disseminating stormwater information, guidance and contract specifications for ITD projects. The ITD website is the best and most current source for downloading stormwater information from ITD.

### ***B. PUBLIC INVOLVEMENT/PARTICIPATION***

1. ITD Website - ITD continues to maintain a stormwater/MS4 section on its website. The ITD D1 MS4 permit, annual reports, MS4 map, and water quality data are available on the website for viewing. The public can contact ITD with any comments or questions through the website.

2. ITD Maintenance Section Public Involvement - ITD's Operations Manager and staff are responsible for performing highway maintenance activities on ITD right of way, including maintenance of stormwater infrastructure. Any public or regulatory agency concerns and comments can be directed to the ITD District 1 Operations Manager at any time during normal business hours by calling 208-772-1200, accessing the ITD website or by visiting or writing to the District 1 Office at 600 W. Prairie Avenue Coeur d'Alene, Idaho 83815.
  
3. ITD Transportation Planning Activities - ITD routinely participates the Kootenai Metropolitan Planning Organization (KMPO) quarterly meetings. Formed in 2003, KMPO and its technical arm, the Kootenai County Area Transportation Team (KCATT), meet monthly to facilitate its mission. These groups oversee transportation activities within the federally designated urban area boundary; develop the transportation work plan and a transportation demand model. The KMPO consists of several transportation and land use planning organizations that include the following: Cities of Coeur d'Alene, Post Falls, Hayden, Rathdrum, Kootenai County, Post Falls Highway District, Lakes Highway District, Eastside Highway District and ITD. The KMPO process also helps shape projects that may become incorporated into ITD's Transportation Improvement Program. KMPO meetings include an open public comment opportunity to allow for public involvement in KMPO activities. Stormwater issues or concerns may be raised by the public during KMPO meetings.
  
4. Adopt a Highway Program – Adopt a Highway groups collected approximately 3,972 pounds of litter within the MS4 portion of the I-90 right of way between milepost 12 and 15 during the current reporting year.

### ***C. ILLICIT DISCHARGE DETECTION AND ELIMINATION***

1. Dry Weather Screening - Dry weather screening was not conducted during the current reporting year due to the active status of the I-90 reconstruction project.
  
2. Spill Response - ITD's spill response procedures are identified in the *Transportation Incident Management Plan for the State of Idaho, January 2008*. This document can be obtained from the ITD website.
  
3. Complaint Filing - ITD has also set up an electronic file folder to record and track any public complaints or information that may be received. Complaints or other information

related to MS4 management and operation can be communicated to the District 1 Headquarters office at 208-772-1200. No specific complaints were recorded during the current reporting period.

4. ITD MS4 Map - ITD has developed a stormwater infrastructure map of the I-90 facility within the city limits of Coeur d'Alene. The map may be modified over time with new information. No changes to the map were made during the current reporting year. The MS4 map is posted on the ITD website.
5. Illicit Discharge Training - As discussed in Control Measure 1, ITD implements an ongoing stormwater education and training program for its employees and interested contractors in the area of NPDES regulations, stormwater management, and sediment and erosion control BMPs. The training program will be maintained, updated, and revised periodically as regulations change and BMP technical support materials are updated.

#### ***D. CONSTRUCTION SITE STORMWATER RUNOFF CONTROL***

Reconstruction of the existing I-90 pavement section and interchange ramps between Northwest Boulevard and Sherman Avenue was commenced in 2017 and continued through the 2019 construction season. Stormwater discharges associated with construction activities is currently covered under the NPDES Construction General Permit.

#### ***E. POST-CONSTRUCTION STORM WATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT***

As noted above in part D, I-90 between Northwest Boulevard and Sherman Avenue was reconstructed in 2017 and 2018 with some remaining slope stabilization/revegetation work in 2019. The function and capacity of stormwater system has been maintained by the project.

#### ***F. POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS***

The principle stormwater pollutant in highway runoff is sediment (sand) from highway sanding operations. Sediment deposits can build up along roadway shoulders, catch basins, and within open ditches along the roadway. Maintenance activities to address sedimentation of the system include periodic shoulder shaping, drop inlet sediment

removal, and ditch cleaning to maintain the original line and grade of the stormwater system. In recent years ITD has scaled back on its use of sand for use as anti-skid material and now uses more salt brine than in the past. Less sanding on I-90 generally means less frequent maintenance to remove sand deposits on shoulders and from drop inlets and ditches. Routine roadway brooming and drop inlet maintenance is typically done in the spring of each year. Portions of the stormwater conveyance system within the MS4 portion of I-90 have been replaced as part of the I-90 reconstruction project.

I-90 within the MS4 drainage area has been routinely inspected pursuant to NPDES Construction General Permit requirements since the I-90 reconstruction project began in 2017. All of the highway embankment slopes along the facility are currently stable with no signs of erosion. The catch basins, piping and ditches are in proper working condition. Currently ITD has no concerns with the MS4 operation and has no immediate plans to perform ditch maintenance. In the future, if sediment removal from ditches becomes necessary again, the work will be conducted during dry weather periods when the MS4 is dry and the potential for sediment discharge is low.

Operation and maintenance (O&M) of the I-90 MS4 does not require any of the following activities: fleet vehicle maintenance and washing, materials storage, building maintenance, grounds/park maintenance, hazardous material storage, used oil recycling, sand/salt storage, solid waste transfer activities, spill control and prevention measures for refueling facilities, or snow disposal site operation.

#### ***G. CONTROL OF THE DISCHARGE OF POLLUTANTS OF CONCERN***

Samples were collected per the MS4 permit requirements in 2019 (see updated data log). Sampling events occurred on 5/31/2019, 6/21/2019, 8/12/2019 and 9/6/2019.

#### ***H. RESULTS OF INFORMATION COLLECTED AND ANALYZED DURING THE PREVIOUS 12 MONTH PERIOD:***

See Attached.

#### ***I. SUMMARY OF THE NUMBER OF INSPECTIONS, FORMAL ENFORCEMENT ACTIONS AND SIMILAR ACTIONS PERFORMED BY THE PERMITTEE:***

No formal enforcement actions or recommendations were filed during the current reporting period.

***J. SUMMARY OF NON-EPA RELATED COMPLAINTS AND/OR ENFORCEMENT ACTIONS:***

There were no non-EPA related complaints and/or enforcement actions during the current reporting period.

***K. COPIES OF EDUCATIONAL MATERIALS, ORDINANCES, INVENTORIES, GUIDANCE MATERIALS OR OTHER PRODUCTS:***

Refer to ITD website.

***L. ACTIVITIES TO BE UNDERTAKEN IN COMING YEAR:***

Continue water quality monitoring and conduct dry weather survey.

***M. DESCRIPTION AND SCHEDULE FOR IMPLEMENTATION OF ADDITIONAL BMPS THAT MAY BE NECESSARY BASED ON MONITORING RESULTS TO ENSURE COMPLIANCE WITH APPLICABLE WATER QUALITY STANDARDS:***

None

***N. NOTICE IF THE PERMITTEE IS RELYING ON ANOTHER ENTITY TO SATISFY PERMIT OBLIGATIONS:***

None

**FIGURES AND ATTACHMENTS**

- ITD D1 MS4 Water Quality Laboratory Results

**ITD 2019 Water Quality Monitoring Data from MS4 Sampling Station at Sherman Avenue, CdA, ID**

MS4 Outlet	Date	Flow (cfs)	Temp (deg C.)	TSS (mg/L)	Total Nitrogen	Nitrate	Nitrite	TKN	TP	Lead (ug/l)	Zinc (ug/l)	hardness	Cl	Mg	Ca	PCBs
Below Sherman IC	11/6/2008	NA	NA	10	2.51	1.8	ND	0.62	0.061	ND	ND	112	17	11.1	26.4	ND
	7/1/2009	NA	NA	3	1.59	0.8	ND	0.57	0.126	ND	ND	NA	19	8.6	26.4	ND
	12/22/2009	NA	NA	96	2.37	1.4	ND	1.01	0.23	ND	0.071	77.6	21	18.3	7.75	ND
	3/26/2010	NA	NA	19	0.76	ND	ND	0.4	0.07	ND	0.025	40.6	9.2	3.82	9.98	ND
	6/9/2010	6.92	13	15	0.63	ND	ND	0.29	0.067	ND	0.017	30	NA	2.68	7.6	ND
	10/29/2010	1.66	7	85	2.11	1.2	ND	0.86	0.17	0.012	0.046	90.6	NA	8.76	21.8	ND
	4/11/2011	8.75	12	13	0.59	ND	ND	0.27	0.066	ND	0.019	30.3	NA	2.81	7.51	ND
	6/13/2011	2.19	14	16	0.38	ND	ND	0.38	0.0686	ND	ND	36.3	NA	3.34	8.96	ND
	11/22/2011	13.65	3.3	47	0.51	ND	ND	0.51	0.155	ND	0.039	10.4	NA	1.09	2.35	ND
	1/30/2012	8.87	5	40	0.945	0.51	ND	0.435	0.132	ND	0.02	28.3	NA	2.78	6.68	NA
	4/26/2012	2.36	12.4	106	3.4	ND	ND	3.4	0.186	0.011	0.06	40.2	6.19	4.04	9.36	ND
	6/5/2012	1.2	14.7	8	0.285	ND	ND	0.285	0.046	ND	ND	37.6	5.07	3.12	9.82	ND
	8/22/2012	0	NA	15	2	0.81	ND	1.19	0.119	ND	0.019	54.5	15.7	4.66	14.1	ND
	10/30/2012	0.06	9.8	14	1.22	0.69	ND	0.528	0.121	ND	0.037	66.5	12.7	6.3	16.1	ND
	5/28/2013	1.69	12	54	0.716	ND	ND	0.716	0.119	ND	0.041	33.4	12.1	3.46	7.66	ND
	6/19/2013	0.57	19	21	0.914	ND	ND	0.914	0.161	ND	0.033	29.3	6.71	2.35	7.85	ND
	8/30/2013	1	18.5	30	2.26	0.95	ND	1.31	0.218	0.0049	0.0398	32.5	5.58	2.39	9.07	ND
	4/22/2014	0.56	8.5	11	0.59	ND	ND	0.509	0.055	ND	0.018	44.8	NA	4.09	11.2	ND
	6/17/2014	0.41	12.7	19	0.817	ND	ND	0.817	0.119	ND	0.035	39.2	NA	3.25	10.3	ND
	10/23/2014	4.61	12.6	39	0.613	ND	ND	0.613	0.215	ND	0.04	13.3	1.61	1.08	3.55	ND
	3/15/2015	1.8	7	NA	0.838	ND	ND	0.838	0.18	0.013	NA	39.3	NA	3.84	9.39	ND
	5/24/2015	1.32	15.5	NA	8.11	ND	ND	8.11	2.35	0.157	NA	139	NA	18.9	24.7	ND
	7/11/2015	0.1	22.7	NA	14.7	1.87	0.13	12.7	1.46	0.099	NA	92.9	NA	11.7	17.8	ND
	10/31/2015	0.279	11.1	NA	1.61	ND	ND	1.61	0.33	0.01	NA	21.9	NA	1.55	6.22	ND
	3/29/2016	13.3	6.5	557	2.49	ND	ND	2.49	0.63	0.15	0.399	54.7	NA	6.57	11.1	ND
	5/26/2016	4.2	11.8	1570	6.19	ND	ND	6.19	1.72	0.167	0.617	116	NA	15.3	21.4	ND
	8/10/2016	8.98	15	830	7.42	1.69	ND	5.73	0.962	0.086	0.315	70	NA	7.92	15	ND
	10/11/2016	5.5	10.8	1810	7.82	0.71	ND	7.11	1.83	0.204	0.719	136	NA	17.1	26.4	ND
	4/7/2017	11.5	8.5	62	0.513	ND	ND	0.531	0.125	ND	0.034	28.8	NA	2.77	6.96	ND
	9/18/2017	2.45	14.96	136	3.35	0.91	0.13	2.31	0.542	16.2	92.1	30.7	NA	2.85	7.6	ND
	10/20/2017	1.02	11.55	18	0.415	ND	ND	0.415	0.102	ND	0.022	21.2	NA	1.62	5.82	ND
	4/30/2018	2.81	9.5	13	0.563	0.24	ND	0.323	0.051	0.0011	ND	35.9	NA	3.43	8.71	ND
	6/21/2018	1.7	13.1	274	2.33	0.43	ND	1.9	0.55	17.6	115	51	NA	5.43	11.5	ND
	8/27/2018	1.8	18.4	48	2.02	0.65	ND	1.37	0.31	4.64	46	25.1	NA	1.98	6.79	ND
	10/26/2018	2.4	10	1100	3.7	0.62	ND	3.15	1.04	0.087	0.267	60.7	NA	8.34	10.5	ND
	5/31/2019	0.127	16	110	2.39	0.62	ND	1.77	0.407	29.5	98.7	110	NA	10.9	25.9	ND
	6/21/2019	0.148	16	91.1	1.63	0.42	ND	1.21	0.282	19.8	67.9	91.1	NA	8.89	21.9	ND
	8/12/2019	0.109	17.8	142	1.05	0.394	ND	0.653	0.232	14	64.9	26.8	NA	2.44	6.71	ND
	9/6/2019	0.15	18.3	27	2.42	0.857	0.112	1.45	0.169	5.63	30.1	88.1	NA	7.88	22.3	ND