

CHAPTER 14 REPORTING PROGRAM

The Reporting Program is responsible for submitting Annual Reports to DOH by October 31st of each year. Annual Reports are the primary mechanism through which DOT-HWYS documents SWMP activities and demonstrates compliance with the MS4 Permit and Consent Decree. Annual Reports provide a detailed description of the storm water management activities conducted by each program element during the reporting period, as well as an evaluation of the effectiveness of such activities, the resources allocated to implement the SWMP, and an explanation of anticipated future activities. In addition, any modifications made to the SWMPP, certain plans, or the MS4 are also documented in Annual Reports.

This chapter covers the following topics:

1. SWMP reporting requirements and procedures as stipulated by the MS4 Permit and Consent Decree.
2. Content and structure of Annual Reports.

Annual Reports are submitted in accordance with the MS4 Permit and Consent Decree requirements outlined in Table 14-1 and Table 14-2, respectively.

Table 14-1. MS4 Permit Requirements for the Reporting Program

MS4 Permit Reference	SWMPP Section
<i>Part G.1.a The Permittee shall submit the Annual Report by October 31st of each year in pdf format (minimum 300 dpi) in accordance with Part A.6. The Annual Report shall cover the past fiscal year. The Annual Report for the fiscal year prior to the expiration date of the permit shall serve as the permit's renewal application. Submittal of the renewal application shall include a \$1,000 filing fee. (Note: The reference to Part A.6 in this requirement is an error in the MS4 Permit, which is intended to reference Part A.7.)</i>	Section 14.1
<i>Part G.1.b The Permittee shall revise its SWMP to include a description of reporting procedures and activities, including schedules and proposed content of the Annual Reports such that, at a minimum, the following is reported for each storm water program component in each Annual Report:</i>	Section 14.1 Section 14.2
<i>Part G.1.b.(1) Requirements - Describe what the Permittee was required to do (describe status of compliance with conditions of this permit and other commitments set forth in the SWMP).</i>	Section 14.1 Section 14.2
<i>Part G.1.b.(2) Past Year Activities - Describe activities over the reporting period in comparison to the requirements, including, where applicable, progress accomplished toward meeting specific measurable goals, standards and milestones or other specific performance requirements. When requirements were not fully met, include a detailed explanation as to why the Permittee did not meet its commitments for the reporting period. Also describe an assessment of the SWMP, including progress towards implementing each of the SWMP program components.</i>	Section 14.2

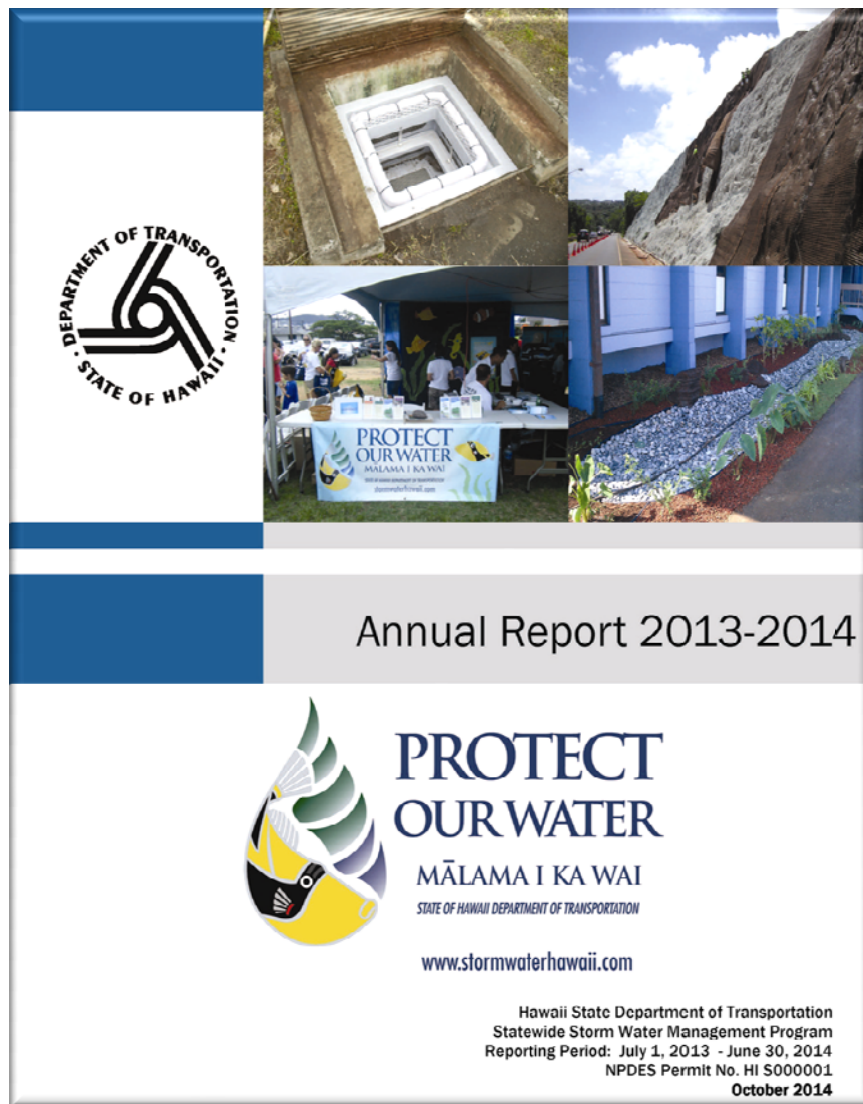
MS4 Permit Reference	SWMPP Section
Part G.1.b.(3) Future Activities - Describe planned activities, including, where applicable, specific activities to be undertaken during the next reporting period toward accomplishing specific measurable goals, standards and milestones or other specific performance requirements.	Section 14.2
Part G.1.b.(4) Resources - Report on the status of the Permittee's resource base for implementing this NPDES permit during the applicable reporting period and an estimate of the resources over and above those required in the current reporting period that will be required in the next reporting period.	Section 14.2
Part G.1.c Modifications - In each Annual Report, the Permittee shall describe any modifications made to the SWMP and implementation schedule during the past year, including justifications. The Permittee shall also describe major modifications made to the Permittee's MS4, including, but not limited to, addition and removal of outfalls, drainage lines, and DOT-HWYS facilities.	Section 14.1
Part G.1.d Program Effectiveness Reporting - Within one (1) year of the effective date of the permit, the Permittee shall submit to DOH a written strategy for determining effectiveness of its SWMP. The strategy shall include water quality monitoring efforts as well as program implementation information and other indicators. The Permittee shall include an assessment of program effectiveness and identification of water quality improvements or degradation beginning with the 2nd Annual Report.	Section 14.1

Table 14-2. Consent Decree Requirements for the Reporting Program

Consent Decree Reference	SWMPP Section
Pg 20, Section V.10.d HDOT shall revise its SWMPP to include a discussion of specific activities to be undertaken in order to assess BMP effectiveness, including an evaluation of success in achieving measurable goals and a discussion of available and applicable water quality monitoring data. Assessments of program effectiveness shall be conducted at least annually and be reported in HDOT's End-of-Year Report.	Section 14.2
Pg 20, Section V.10.e HDOT shall revise its SWMPP to include a description of reporting procedures and activities, including schedules and proposed content of semiannual and annual reports such that, at a minimum, the following is reported for each storm water program element (BMP Program) in each Mid-Year and End-of-Year Report: (1) Requirements: description of what HDOT was required to do (permit requirements, EPA or DOH order for compliance, or other commitments set forth in the SWMPP and this Consent Decree); (2) Past Year Activities: description of activities over the reporting period including, where applicable, progress accomplished toward meeting specific measurable goals or other specific performance requirements and including, when requirements were not fully met, a detailed explanation as to why HDOT did not meet its commitments for the reporting period; (3) Future Activities: description of planned activities including, where applicable, specific activities to be undertaken during the next reporting period toward accomplishing specific measurable goals or other specific performance requirements; (4) Resources: report on the status of HDOT's resource base for implementing both this Consent Decree and HDOT's NPDES permit during the applicable reporting period, together with an estimate of the resources over and above those required in the current reporting period that will be required in the next reporting period. (Note: On March 26, 2014, DOT-HWYS notified DOH and	Section 14.2

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Consent Decree Reference	SWMPP Section
EPA that Mid-Year Reports will no longer be submitted. Per Part G.1.a of the MS4 Permit, DOT-HWYS is only required to submit Annual Reports.)	
<p>Pg 29, Section V.14 For the first year after entry of this Consent Decree, HDOT shall submit quarterly reports to EPA and DOH that shall include the following information for the past quarter. The first quarterly report shall be due 60 days after the end of the first complete quarter following entry of this Consent Decree. All other reports shall be submitted no later than 45 days after the last day of each calendar quarter. After submittal of the fourth quarterly report referenced above HDOT shall, for the duration of this Decree, submit semiannual reports. Semiannual reports shall be due on August 31st and February 28th and shall cover the six month periods ending on June 30th and December 31st, respectively. HDOT may submit separate quarterly and semiannual reports for the Airports and Highways Divisions.</p>	Section 14.1



Annual Reports provide a detailed description of the storm water management activities conducted by each program element.

14.0 Program Organization

To fulfill the requirements of the MS4 Permit and the Consent Decree, the following organizational structure has been established for the Reporting Program.

Reporting Program

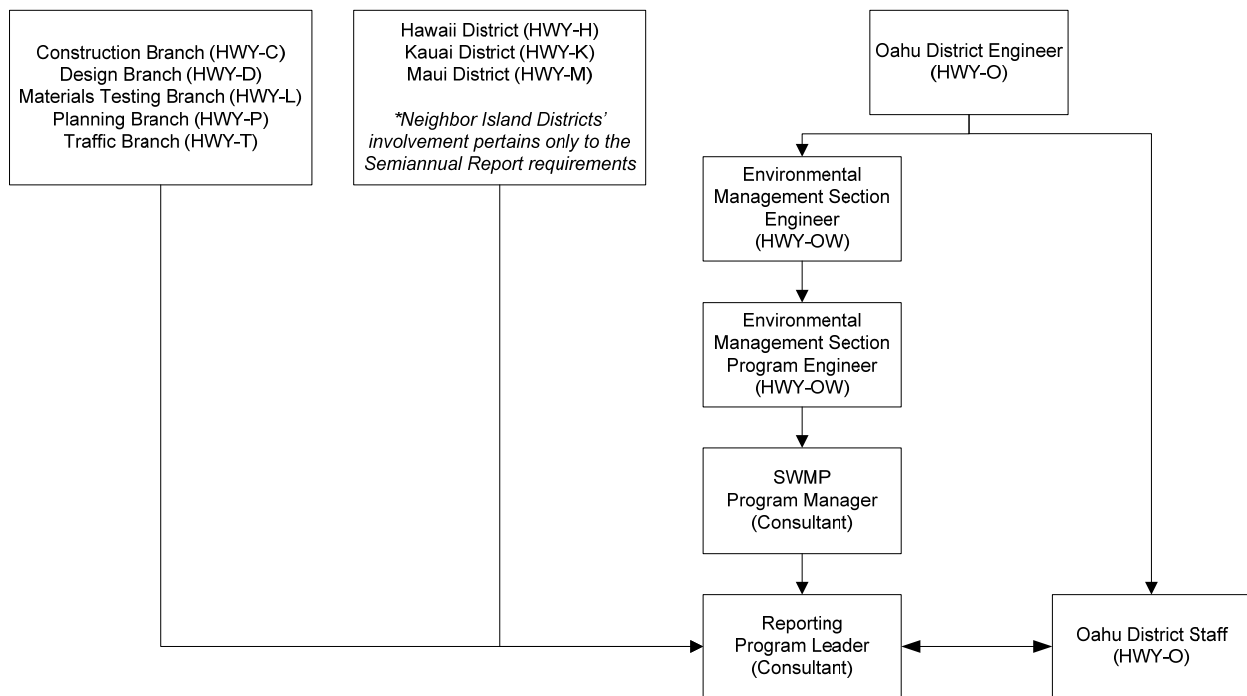


Figure 14-1. Reporting Program Organizational Chart

14.1 Addressing Requirements

DOT-HWYS is required by Part G.1.a of the MS4 Permit to submit an Annual Report to DOH and USEPA by October 31st of each year. In accordance with Part A.7 of the MS4 Permit, Annual Reports are submitted to DOH in pdf format through the e-Permitting Portal website, as well as through the mail in compact disc format. Hard copies are mailed to the USEPA in accordance with Part A.8 of the MS4 Permit. Annual Reports cover a reporting period from July 1st of the previous year to June 30th of the submittal year.

Parts G.1.b.(1) through G.1.b.(4) of the MS4 Permit and Section V.10.e of the Consent Decree dictate the information that DOT-HWYS is required to include in Annual Reports. The content included in Annual Reports will be discussed in Section 14.2.

As required by Part G.1.c, in conjunction with Part D.3, of the MS4 Permit, Annual Reports include a description of any modifications made to the SWMPP and/or implementation schedule,

and any major modifications made to the MS4. Modifications to the MS4 may include structural changes to the drainage system or DOT-HWYS facilities, as well as the addition or removal of MS4 drainage structures from the GIS database.

In accordance with Part G.1.d of the MS4 Permit, DOT-HWYS submitted a written strategy for determining the effectiveness of the SWMP (Program Effectiveness Strategy) (Appendix L.1) to DOH within one year of the effective date of the MS4 Permit. DOT-HWYS will include an assessment of program effectiveness and an identification of water quality improvements or degradation beginning with the 2nd Annual Report.

Table 14-3 summarizes additional information DOT-HWYS is required to include in Annual Reports, as necessary.

Table 14-3. Additional MS4 Permit Reporting Requirements

MS4 Permit Reference	Action
<i>Part D.1.a.(3)</i>	Summary of the public education evaluation results
<i>Part D.1.d.(1)</i>	Revisions to construction standards
<i>Part D.1.f.(1).(ii)</i>	Revisions to priority-based schedules for street sweeping/drain cleaning
<i>Part D.1.f.(1).(iv)</i>	Annual updates to the implementation schedule of the Retrofit Action Plan
<i>Part D.1.f.(1).(v)</i>	Summary of trash load reduction actions (types of actions, levels of implementation, the total trash loads and dominant types of trash removed by its actions, and the total trash loads and dominant types of trash for each type of action)
<i>Part D.1.f.(3).(iv)</i>	Status report on the implementation schedule for the Outfall Erosion Action Plan
<i>Part D.1.g.(4)</i>	Modified Industrial and Commercial Facility and Activity Plan
<i>Part D.3.a</i>	Report and justify all other modifications made to the SWMP
<i>Part D.3.b</i>	All alterations and/or additions to the DOT-HWYS MS4
<i>Part G.3.a</i>	Amendments to the City MOU
<i>Part G.3.b</i>	Amendments to the DOH MOU

Any amendments to the MOU between DOT-HWYS and the CCH (Appendix A.4) or the MOU between DOT-HWYS and DOH (Appendix A.3) will be summarized in the Annual Report, as required by Part G.3 of the MS4 Permit.

In addition to Annual Reports, DOT-HWYS submits semiannual reports to DOH and USEPA, in accordance with Section V.14 of the Consent Decree. Semiannual reports are submitted by August 31st and February 28th of each year and cover six month reporting periods ending on June 30th and December 31st, respectively. Upon termination of the Consent Decree, submission of semiannual reports will no longer be required.

Annual Monitoring Reports, which are required by Part G.2 of the MS4 Permit, are discussed in the Monitoring Program Chapter of this SWMPP (Chapter 12).

14.2 Annual Report Content

The requirements provided in Tables 14-1, 14-2, and 14-3 will be addressed in Annual Reports in accordance with the timeframes and circumstantial guidelines stipulated by the MS4 Permit and Consent Decree, as they pertain to each requirement.

The Annual Report chapters are organized by program element, as follows:

- Public Education and Outreach;
- Public Involvement/Participation;
- Illicit Discharge Detection and Elimination;
- Construction Site Runoff Control;
- Post-Construction Storm Water Management in New Development and Redevelopment;
- Pollution Prevention/Good Housekeeping;
- Industrial and Commercial Activities Discharge Management; and
- Water Quality Monitoring.

Each chapter in the Annual Report contains the following information:

- Requirements – This section describes what is required and DOT-HWYS' status of compliance with the MS4 Permit requirements.
- Past Activities – This section describes all DOT-HWYS' activities that were performed during the reporting period to meet the MS4 Permit requirements.
- Future Activities – This section describes planned activities, including specific activities to be undertaken during the next reporting period.
- Program Evaluation – This section reports on the progress of the program in comparison to performance measures provided in the *Monitoring Program Effectiveness* Section at the end of each SWMPP chapter. Graphical analysis, figures, and tables are used to facilitate assessment purposes.

The resources expended to implement the SWMP are detailed in the end of the Annual Report.

Annual Reports are utilized by program management to analyze the effectiveness of past SWMP activities and to guide an iterative approach to future decision making regarding resource allocation and program implementation.