

ARR040000 Recertification Notice of Intent for Regulated Small Municipal Separate Storm Sewer Systems (MS4s) General Permit

version 1.18

(Submission #: HQ4-3ZS3-W9F56, version 1)

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Location: North Little Rock, Arkansas



Details

AFIN 88-00826
Submission ID HQ4-3ZS3-W9F56
Submission Reason Renewal

Form Input

Permit Information

Recertification Instruction

Please review all fields carefully for typos or inaccurate information. If the information in the corresponding field is incorrect, please update the corresponding field with the correct information by typing over the existing information.

If the Permittee (Legal Name) changes, you will need to also submit a permit transfer form.

The update SWMP must be submitted in accordance with the permit.

Permittee (Legal Name)

The permittee means any person (an individual, association, partnership, corporation, municipality, state, or federal agency) who has the primary management and ultimate decision-making responsibility over the operation of a facility or activity.

Permit No.
ARR040004

AFIN
88-00826

Permittee (Legal Name)
Arkansas Department of Transportation

Site Contact Person

Contact Person Information

First Name Last Name
Kayti Ewing

Title
Section Head Natural Resources

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Urbanized/Core Areas

Conway, Fayetteville-Springdale, Fort Smith, Hot Springs, Jonesboro, Little Rock, Maumelle, West Memphis, Pine Bluff, Texarkana

Receiving Stream

Various, Can be found in file.

Is this MS4 identified on the list of the EPA approved Total Maximum Daily Loads (TMDL)?

No.

From our database, the Responsible Official are listed in the following**Responsible Official First Name**

Jessie

Responsible Official Last Name

Jones

Responsible Official Title

ACE-Planning

Did the Responsible Official Change?

No

Please provide the Responsible Official Email Address

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From our database, the Cognizant Official are listed in the following**Cognizant Official First Name**

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Cognizant Official Last Name

Seagraves

Cognizant Official Title

Env. Div. Head

Did the Cognizant Official Change?

No

Please provide the Cognizant Official Email Address

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Mailing Address

PO Box 2261

Little Rock, AR 72203

Is the invoice address the same as the mailing address?

Yes

Attach Updated SWMP and Updated Storm Sewer System Map

FINAL_2024_SWMP.pdf - 07/01/2024 12:03 PM

Comment

Attached is ARDOT's updated SWMP for the permit cycle of 2024-2029.

Statewide Stormwater Management Program

Arkansas Department of Transportation



August 2024

Arkansas Department of Transportation
Environmental Division
10324 Interstate 30
P. O. Box 2261
Little Rock, Arkansas 72203
(501) 569-2522

Note

This document has been modified from the August 2019 version to reflect the 2024-2029 MS4 Permit.

Certification

The Arkansas Department of Transportation (ARDOT) developed this Statewide Stormwater Management Program (SWMP) in accordance with requirements of the National Pollutant Discharge Elimination System (NPDES) Regulated Small Municipal Separate Storm Sewer Systems (MS4s) located within the State of Arkansas, Permit Number ARR040004, issued by the Arkansas Department of Energy and Environment Quality and effective August 1, 2024.

"I certify under penalty of 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 gathered and evaluated 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 for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Jessie X. Jones
Assistant Chief Engineer – Planning
Arkansas Department of Transportation

Date

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ACRONYMS

ADH	Arkansas Department of Health
AHP	Arkansas Highway Police
APC&EC	Arkansas Pollution Control and Ecology Commission
ARDOT	Arkansas Department of Transportation
BMP	Best Management Practice
CTTP	Center for Training Transportation Professionals
CWA	Clean Water Act
DCE	District Construction Engineer
DE	District Engineer
DEQ	Division of Environmental Quality
DME	District Maintenance Engineer
DOT	Department Of Transportation
EPA	Environmental Protection Agency
ERW	Extraordinary Resource Waters
ESW	Ecologically Sensitive Waterbodies
GPS	Global Positioning System
MCM	Minimum Control Measure
MS4s	Regulated Small Municipal Separate Storm Sewer Systems
NOI	Notice of Intent
NOT	Notice of Termination
NPDES	National Pollutant Discharge Elimination System
NSW	Natural and Scenic Waterways
POTW	Publicly Owned Treatment Works
PPP	Pollution Prevention Plan
SPCC	Spill Prevention, Control, and Countermeasures
SWMP	Stormwater Management Program
SWPPP	Stormwater Pollution Prevention Plan
T ²	Technology Transfer Program
TMDL	Total Maximum Daily Load
UA	Urban areas with a population of at least 50,000 people

1 INTRODUCTION

The Arkansas Department of Transportation (Department or ARDOT) developed this Statewide Stormwater Management Program (SWMP) in accordance with requirements of the National Pollutant Discharge Elimination System (NPDES) Regulated Small Municipal Separate Storm Sewer Systems (MS4s) located within the State of Arkansas, permit number ARR040000, issued by the Arkansas Department of Energy and Environment, Division of Environmental Quality (DEQ), and effective August 1, 2024. The SWMP describes the minimum procedures and practices used to reduce discharge of pollutants into storm drainage systems owned and operated by the Department. The Department will evaluate the need for revision of the Statewide SWMP at least annually.

This statewide SWMP addresses stormwater pollution control related to highway planning, design, construction activities, maintenance activities, and Department facilities throughout the State of Arkansas. In addition, this statewide SWMP addresses responsibilities within the Department for implementing stormwater management procedures and practices, as well as training, public education and participation, monitoring, program evaluation, and reporting activities.

The NPDES Stormwater Phase II Final Rule requires nationwide coverage of all regulated operators of small MS4s located within the boundaries of the Bureau of the Census-defined urban areas with a population of at least 50,000 people (UA) based on the last decennial census. The Final Rule also requires that the NPDES permitting authority develop and apply designation criteria to make a final determination of which communities are required to comply with this regulation.

The regulations define the term “municipal separate storm sewer systems” to mean “a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, and storm drains): (1) Owned or operated by a state, city, town, county, district, association, or other public body (created by or pursuant to state law) having jurisdiction over disposal of sewage, industrial wastes, stormwater, or other wastes, including special districts under state law such as a sewer district, flood control district or drainage district, or similar entity, or a designated and approved management agency under section 208 of the Clean Water Act (33 U.S.C. 1288) that discharges to waters of the United States; (2) Designed or used for collecting or conveying stormwater; (3) That is not a combined sewer; and (4) That is not part of a publicly owned treatment works (POTW).” [Permit ARR040000, Part VI].

1.1 Regulatory Background

The Federal Water Pollution Control Act (the Act), enacted in 1948, was the principal law governing pollution of the nation’s surface waters. It authorized the Surgeon General of the Public Health Service, in cooperation with other federal, state, and local entities, to prepare comprehensive programs for eliminating or reducing the pollution of interstate

waters and tributaries and improving the sanitary conditions of surface and underground waters.

The Act was revised by amendments in 1972, and in 1977 was renamed the Clean Water Act (CWA). The 1972 legislation defined programs for water quality improvement that have since been expanded and are still implemented by industries and municipalities. In 1991, the CWA was reauthorized. The CWA strives to restore and maintain the chemical, physical, and biological integrity of the nation's water by utilizing a system of water quality standards, discharge limitations, and permits. Table 1-1 summarizes the evolution of the CWA.

Federal Water Pollution Control Legislation	
Table 1-1	
Year	Legislation
1948	Federal Water Pollution Control Act
1956	Water Pollution Control Act of 1956
1961	Federal Water Pollution Control Act Amendments
1965	Water Quality Act of 1965
1966	Clean Water Restoration Act
1970	Water Quality Improvement Act of 1970
1972	Federal Water Pollution Control Act Amendments
1977	Clean Water Act of 1977
1981	Municipal Wastewater Treatment Construction Grants Amendments
1987	Water Quality Act of 1987

Prior to 1987, programs were primarily directed at point source pollution (wastes discharged from discrete sources such as pipes and outfalls). Amendments in that year authorized measures to address non-point source pollution (section 319 of the Act), now estimated to represent more than 50% of the nation's remaining water pollution problems.

To achieve its objectives, the CWA embodies the concept that all discharges into the nation's waters are unlawful, unless specifically authorized by a permit. Thus, industrial and municipal dischargers must obtain permits from the United States Environmental Protection Agency (EPA) or qualified states under the Act's NPDES program (authorized in section 402 of the Act). An NPDES permit requires the discharger to attain technology-based effluent limits.

The CWA utilizes both water quality standards and technology-based effluent limitations to protect water quality. Technology-based effluent limitations are specific numerical limitations established by EPA and placed on certain pollutants from certain sources. They are applied to industrial and municipal sources through numerical effluent limitations in discharge permits. The Act requires each state to establish water quality standards for all Waters of the United States in the state. These standards serve as the backup to federally set technology-based requirements by indicating where additional pollutant controls are needed to achieve the overall goals of the Act. In waters where industrial and municipal sources have achieved technology-based effluent limitations, yet water quality standards have not been met, dischargers may be required to meet additional pollution control requirements.

In response to the 1987 Amendments to the CWA, the EPA developed Phase I of the NPDES Stormwater Program in 1990. The Phase I program addressed stormwater discharge from medium to large MS4s located in incorporated places or in counties with a population of 100,000 or more. It also addresses discharge from 11 categories of industrial activities, including construction activities that disturb five or more acres of land.

The Phase II Rule, published December 8, 1999, addresses stormwater discharge from small MS4s located within the boundaries of the Bureau of the Census-defined urban areas with a population of at least 50,000 people serving a population of 100,000 people or less. It also addresses stormwater discharges from construction activities disturbing one acre or more of land.

The CWA (as amended) directs EPA to implement federal regulations governing water quality, including discharges from stormwater drainage systems. The CWA also allows EPA to delegate NPDES permitting authority to states that have approved regulatory programs. Within the state of Arkansas, DEQ issues, monitors, and enforces NPDES permits through its legal authority provided by the EPA.

1.2 NPDES Applicability to the Department

Under the federal stormwater regulations, portions of the Department's properties, facilities, and activities come under the jurisdiction of the NPDES program for three primary reasons:

- 1) The Department's highways and highway-related properties, facilities, and activities are served by extensive storm drain systems that are often connected to, and are considered to be, municipal separate storm sewer systems, and are covered explicitly in the federal MS4 stormwater regulations.*
- 2) Construction of the Department's highways and related activities often result in soil disturbance of one acre or more, for which specific requirements are established under Phase I and II.*
- 3) Some Department facilities have non-stormwater discharges which are regulated under various NPDES permits.*

1.3 Requirements of the General Small MS4 Permit

The Department is required to develop, implement, and enforce a SWMP designed to reduce the discharge of pollutants from the small MS4, to protect water quality, and to satisfy the appropriate water quality requirements and the CWA. The SWMP should include management practices; control techniques and system, design, and engineering methods; and shall be modified to include provisions as DEQ determines appropriate after its review of the program for the control of such pollutants. The SWMP shall include the following information for each of the required six minimum control measures described in the Permit:

- 1) The best management practices (BMPs) that the Department or another entity will or already implements for each of the stormwater MCMs;
- 2) The measurable goals for each BMP, including, as appropriate, the months and years in which the Department will undertake required actions, including interim milestones and the frequency of the action. At a minimum, measurable goals shall be implemented to satisfy the general permit's performance standards;
- 3) The person(s), including position title(s), or just the position title and contact information responsible for implementing or coordinating the BMPs for the SWMP. The SWMP shall include a Table of Organization, including a primary point of contact, which identifies how implementation across multiple positions and departments will occur, and;
- 4) A rationale for how and why each of the BMPs and measurable goals were selected. Since the Department had coverage under a previous version of this permit, then the SWMP and its implementation will be revised to satisfy the general permit's performance standards within two years of when the coverage under the current general permit was granted, or by July 31, 2026.
- 5) Re-evaluation of BMPs in situations where the Department's MS4 discharges to an impaired waterbody or waterbody with an approved Total Maximum Daily Load (TMDL) if the evaluation of the impairment determines the MS4 is a contributor to the impairment or waters designated as Extraordinary Resource Waters (ERW), Ecologically Sensitive Waterbodies (ESW), or Natural and Scenic Waterways (NSW). The enhanced BMPs shall be specifically addressed within the SWMP.

1.4 Permit and SWMP Coverage

The Department has determined that a single NPDES stormwater permit (Permit) (ARR040004) and a comprehensive and consistent SWMP is the most effective approach to addressing stormwater runoff from its facilities statewide (with the exception of the Little Rock MS4 area currently regulated by NPDES Permit Number ARS000002). Compliance with the Permit will then be attained by the implementation of this SWMP.

The Department has developed this SWMP for all Department highways and highway-related properties, facilities, and activities to provide a framework for consistent and efficient implementation of stormwater management practices in all Districts. This approach will facilitate the development of standardized and uniform internal guidance, contracts, and training. In addition, this SWMP extends stormwater management practices outside of the designated Small MS4 areas covered by current federal and state mandated stormwater regulatory programs.

1.5 Organization of the Statewide SWMP Plan

Although this statewide SWMP presents programmatic requirements and provides general guidance, it does not contain the level of detailed guidance and requirements that are needed to serve personnel at all positions with the Department whose daily activities may have an impact on stormwater quality. Such specific guidance is contained in a variety of other information sources currently utilized by the Department, including manuals, standards, and specifications. A complete list, excluding project-specific documents, is included in Appendix C. New materials and updates are addressed through the annual SWMP revision process. This allows the Department the flexibility to make necessary modifications and to expand or improve upon the detailed procedures within the framework of the statewide SWMP.

1.5.1 Reporting Requirements

The Department is required to submit reports to DEQ on the status of compliance with the permit using the DEQ Small MS4 Annual Reporting Form. The reports are due annually on March 31 and cover the previous year from January 1 through December 31 for the permit time frame during the period 2024-2029. The reports must contain the status of compliance with permit conditions, an assessment of the appropriateness of the best management practices, and the progress toward achieving the measurable goals for each of the minimum control measures. Reports are posted on the Department website to give citizens an opportunity for involvement and input.

1.6 The Department's Facilities and Separate Storm Sewer System

The primary mission of the Department is to provide safe and efficient transportation solutions to support Arkansas' economy and enhance the quality of life for generations to come. This mission involves planning, designing, constructing and maintaining large-scale transportation facilities (e.g., freeways, highways, interchanges, bridges, and tunnels). The Department also has the responsibility of accomplishing its mission in ways that comply with public policy and applicable regulations, including complying with the NPDES program of the CWA.

Department facilities are located in diverse settings, ranging from urbanized to rural areas, including cities, towns, farmland, and forests. Drainage systems that serve the Department's properties and highway facilities ultimately discharge stormwater and

permitted or exempt non-stormwater to diverse surface receiving waters such as intermittent and perennial streams, lakes, reservoirs, and wetlands.

Currently, the Department's water discharges are covered under a variety of permits. Stormwater discharges from construction projects located statewide that disturb one acre or more are permitted under DEQ's General Construction Permit for Operators of Facilities Discharging Stormwater Associated With Construction Activity Located in the State of Arkansas ARR150000. In addition, the Department maintains non-construction NPDES and State permits in various areas of the state as shown in Table 1-2.

Current Department Non-Construction Permits				
Table 1-2				
Permit No.	Facility	Permit Type	County	ARDOT District
NPDES Permits				
AR0044270	Gurdon Rest Area	Wastewater	Clark	7
AR0045799	Waldron Rest Area	Wastewater	Scott	4
ARS000002	City of Little Rock and ARDOT MS4	Stormwater	Pulaski	6
ARR040004	ARDOT Statewide MS4 System	Stormwater	Statewide	All
ARG550457	Faulkner Co. Area Maintenance HQ	Wastewater	Faulkner	8
State Permits				
5212-WG-CW	Baxter Co. Area Maintenance HQ	Car Wash	Baxter	9
4843- WG-CW	District 9 Head Quarters	Car Wash	Boone	9
4844- WG-CW	Carroll Co. Area Maintenance HQ	Car Wash	Carroll	9
5249- WG-CW	Fulton Co. Area Maintenance HQ	Car Wash	Fulton	5
5283- WG-CW	Randolph Co. Area Maintenance HQ	Car Wash	Randolph	10

The sensitivity of receiving waters to potential impacts from stormwater discharges varies widely, depending on factors such as location, local hydrology, discharges and pollutants from other sources, and the beneficial uses of the receiving waters. The requirement to establish beneficial uses of receiving waters are established under Section 304 (a) of the CWA and can be found in the Arkansas Pollution Control & Ecology Commission's Rule 2, Rule Establishing Water Quality Standards for Surface Waters of the State of Arkansas. These designated uses include Extraordinary Resource Waters (ERWs), Ecologically

Sensitive Waterbodies (ESWs), Natural and Scenic Waterways (NSWs), primary and secondary contact recreation, fisheries, domestic, agricultural, and industrial water supplies, and other uses not dependent upon water quality.

To protect public safety and prevent property damage, the Department operates its stormwater drainage systems to minimize flooding and prevent the presence of standing water on traveled surfaces. Runoff is typically directed off roadway surfaces (and other paved and non-paved areas within a right of way) via drainage systems within or adjacent to the Department's right of way. At many locations, runoff drains from off-site areas onto the Department's right of way or facilities due to local topography and drainage patterns. In these cases, the Department's drainage systems are designed to convey not only the stormwater contributed from the Department's property, but also stormwater from off-site areas.

In urban areas, some drainage systems discharge directly to receiving waters, while others discharge to municipal storm drain systems. Highways in urban settings typically have curbs and gutters, whereas freeways and rural highways typically discharge stormwater off the shoulder or through median drainage swales.

1.6.1 Coverage of Statewide Stormwater Management Program (SWMP)

The Permit requires coverage for all small MS4s within designated areas of the State of Arkansas and municipalities that DEQ has set designation criteria, which are outside of designated urban areas with a population of at least 50,000 people. These areas include municipalities with a population, according to the latest decennial census of at least 10,000 persons and with a population density of greater than 1,000 persons per square mile meeting one (1) of the following criteria are required to obtain permit authorization:

- 1) *MS4 directly discharges to a 303(d) listed waterbody with pollutants of concern caused by stormwater, or stream with a completed Total Maximum Daily Load (TMDL) citing stormwater as a cause of impairment; or*
- 2) *The MS4 directly discharges to an ERW, ESW, NSW; or*
- 3) *The MS4 has had a 50% population growth rate between the two most recent decennial censuses.*

MS4s designated by these criteria are provided on DEQ's website at <http://www.adeq.state.ar.us/water/permits/npdes/stormwater/>. In the original Permit Notice of Intent (NOI), the Department requested statewide coverage for stormwater discharges from the Department's MS4 throughout Arkansas. The exception to this requested coverage is the MS4 area within the City of Little Rock, currently covered by DEQ Permit Number ARS000002. Details of how the permit requirements are applied statewide can be found in the discussion of the required six minimum measures.

In addition, the Department requested the optional coverage available under the Permit for discharges associated with MS4 industrial activity. This coverage was for Department facilities statewide. There are thirty Department owned and operated facilities located

within the designated small MS4 areas listed in Table 1-3, which fall under the requirements of the NPDES Phase II Program. Five other facilities are located within the Little Rock MS4 area covered by permit number ARS000002. The names and locations of all Department facilities are listed in Appendix A.

The Department did not seek the optional coverage available under the Permit for discharges associated with MS4 construction activity.

This statewide SWMP describes minimum procedures and practices used to reduce the discharge of pollutants from stormwater drainage systems owned or operated by the Department. Department facilities or properties that may be sources of pollutants are:

- *Road surfaces and shoulders (highway rights of way);*
- *Highway-related facilities, including maintenance facilities, park-and-ride lots, tourist information centers, scenic vista points, weigh stations, and welcome centers;*
- *Construction and maintenance activities conducted within highway rights of way; and*
- *Potential material spills on roadways.*

Arkansas Regulated Small MS4s Table 1-3	
MS4	County
Alexander	Pulaski, Saline
Alma	Crawford
Arkadelphia	Clark
Arkansas Department of Transportation	Statewide
Arkansas State University	Craighead
Austin	Lonoke
Barling	Sebastian
Bella Vista	Benton
Benton	Saline
Benton County	Benton
Bentonville	Benton
Bethel Heights	Benton
Brookland	Craighead
Bryant	Saline
Cabot	Lonoke
Cave Springs	Benton
Centerton	Benton
Conway	Faulkner
Crawford County	Crawford
El Dorado	Union

Arkansas Regulated Small MS4s Table 1-3	
MS4	County
Elkins	Washington
Elm Springs	Benton and Washington
Farmington	Washington
Fayetteville	Washington
Fort Smith	Sebastian
Garland County	Garland
Greenland	Washington
Haskell	Saline
Hot Springs	Garland
Jacksonville	Pulaski
Jefferson County	Jefferson
Johnson	Washington
Jonesboro	Craighead
Little Flock	Benton
Little Rock Air Force Base	Pulaski
Lowell	Benton
Marion	Crittenden
Maumelle	Pulaski
Mountain Home	Baxter
Mayflower	Faulkner
North Little Rock	Pulaski
Pea Ridge	Benton
Pine Bluff	Jefferson
Prairie Grove	Washington
Pulaski County	Pulaski
Rogers	Benton
Saline County	Saline
Shannon Hills	Saline
Sherwood	Pulaski
Siloam Springs	Benton
Springdale	Benton and Washington
Texarkana, Arkansas	Miller
Tontitown	Washington
University of Arkansas	Washington
University of Arkansas at Little Rock	Pulaski
University of Arkansas at Pine Bluff	Jefferson
University of Arkansas for Medical Sciences	Pulaski
Van Buren	Crawford
Ward	Lonoke
Washington County	Washington

Arkansas Regulated Small MS4s Table 1-3	
MS4	County
West Memphis	Crittenden
White Hall	Jefferson

1.6.2 Non-stormwater Discharges.

The following non-stormwater discharges have been determined not to be a significant contributor of pollutants into the Department's MS4 system and may be discharged: uncontaminated waterline flushing; landscape irrigation; diverted stream flows; rising ground waters; uncontaminated ground water infiltration (infiltration is defined as water other than wastewater that enters a sewer system, including sewer service connections and foundation drains, from the ground through such means as defective pipes, pipe joints, connections, or manholes. Infiltration does not include, and is distinguished from, inflow.); uncontaminated pumped ground water; discharges from potable water sources; uncontaminated foundation drains; uncontaminated air conditioning condensate; irrigation water; springs; water from crawl space pumps; uncontaminated footing drains; lawn watering; individual residential car washing; flows from riparian habitats and wetlands; dechlorinated swimming pool discharges; uncontaminated street wash water; discharges or flows from emergency firefighting activities; and discharges of gray water from municipal splash pads. (Permit Part. I.2.B.b.).

1.6.3 Limitations on Coverage.

The Permit does not authorize several types of discharges and the following discussion details the Department's plan to comply with these limitations:

- a. *The Permit prohibits discharges that are mixed with sources of non-stormwater unless such non-stormwater discharges are in compliance with a separate National Pollutant Discharge Elimination System (NPDES) permit, or determined by DEQ not to be a substantial contributor of pollutants to surface waters of the State.*

The Department has other discharges which are covered by separate individual or general NPDES permits. These discharges are discussed in Section 1.5 of the SWMP.

- b. *The Permit prohibits stormwater discharges associated with industrial activity as defined in 40 CFR 122.26(b)(14)(i)-(xi) that are not in compliance with a separate NPDES permit. This includes stormwater discharges associated with construction activity as defined in 40 CFR 122.26(b)(14)(x) or 40 CFR 122.26(b)(15).*

The Department has facilities which conduct activities described in 40 CFR 122.26(b)(14) which are not required to obtain Industrial Stormwater General Permits. A Pollution Prevention Plan has been prepared and implemented for these facilities

as required by the previous version of the Permit. The facilities are shown in Appendix A of the SWMP.

- c. *The Permit prohibits discharges associated with construction activity as defined in 40 CFR 122.26(b)(14)(x) or 40 CFR 122.26(b)(15) that are not in compliance with a separate permit.*

All Department activities associated with 40 CFR 122.26(b)(14)(x) or 40 CFR 122.26(b)(15) are covered by NPDES permit requirements outlined in ARR150000.

- d. *The Permit prohibits discharges which will cause, have the reasonable potential to cause, or contribute to an excursion above any applicable water quality standard.*

No discharges of this description are known. If notified that such discharges exist, the Department will either: eliminate the discharge; obtain a separate NPDES permit; or modify the SWMP as necessary to bring the discharges into compliance with water quality standards as required by the Permit.

- e. *The Permit prohibits discharges to impaired waters or waters with an approved TMDL unless certain conditions are met.*

The Department has stormwater outfalls which discharge to waters on the current 303(d) list prepared by DEQ. The current listing of impaired waters can be found at <http://www.adeg.state.ar.us/water/planning/integrated/>. The Department will survey the areas of the MS4 which contribute stormwater to these outfalls and identify any potential significant sources of the pollutants of concern. If such sources are found, the Department will comply with Part III 1.E. of the Permit to reduce the impact of the discharge.

The Department also has stormwater outfalls which discharge to waters with approved TMDLs. The current listing of waters with TMDLs can be found at <https://www.adeg.state.ar.us/water/planning/integrated/tmdl/>. Part III 5. of the Permit requires monitoring in certain cases to determine if the stormwater controls are adequate to maintain compliance with the MS4s wasteload allocation. Since the Department had not been assigned a wasteload allocation in the TMDL documents, no monitoring is required at this time.

1.7 Emergency Response

Throughout the year, conditions may arise that require the Department to conduct emergency activities that protect public health, safety, and property. Because of factors beyond the reasonable control of the permittee, conditions during the emergency activities may prevent the Department from implementing elements of the SWMP.

1.8 Stormwater Quality Issues

Highway runoff pollutants generally come from vehicular contributions, atmospheric deposition, and roadbed material. A variety of constituents including nutrients, organics, oil and grease, and heavy metals come from these sources. Pollutants can be found in both soluble and particulate forms and may impact receiving waters differently depending on the pollutant form present.

In various areas of the State, Waters of the United States pass through, over or under Department property and facilities. In those circumstances, the Department is responsible only for pollutants contributed from its property and not for the pollutants present in those waters after they enter the Department's right of way.

2 PROGRAM MANAGEMENT

2.1 Legal Authority

The administrative control of the Arkansas Department of Transportation is vested in the State Highway Commission. (Arkansas Code Annotated § 27-65-102). Arkansas Code Annotated § 27-65-107 generally details the powers and duties of the State Highway Commission.

The Department has legal authority to manage stormwater discharges occurring from Department owned and maintained facilities and properties located within the highway right of way. Legal authority for stormwater and wastewater discharges from privately held land and lands outside the Department owned right of way is exercised by local municipalities, counties, and agencies.

As a designated small MS4, the Department is not required to comply with other local MS4 regulations, but instead is governed by the regulations established by the Arkansas Pollution Control and Ecology Commission and NPDES Permits issued by DEQ.

2.2 Department Organization

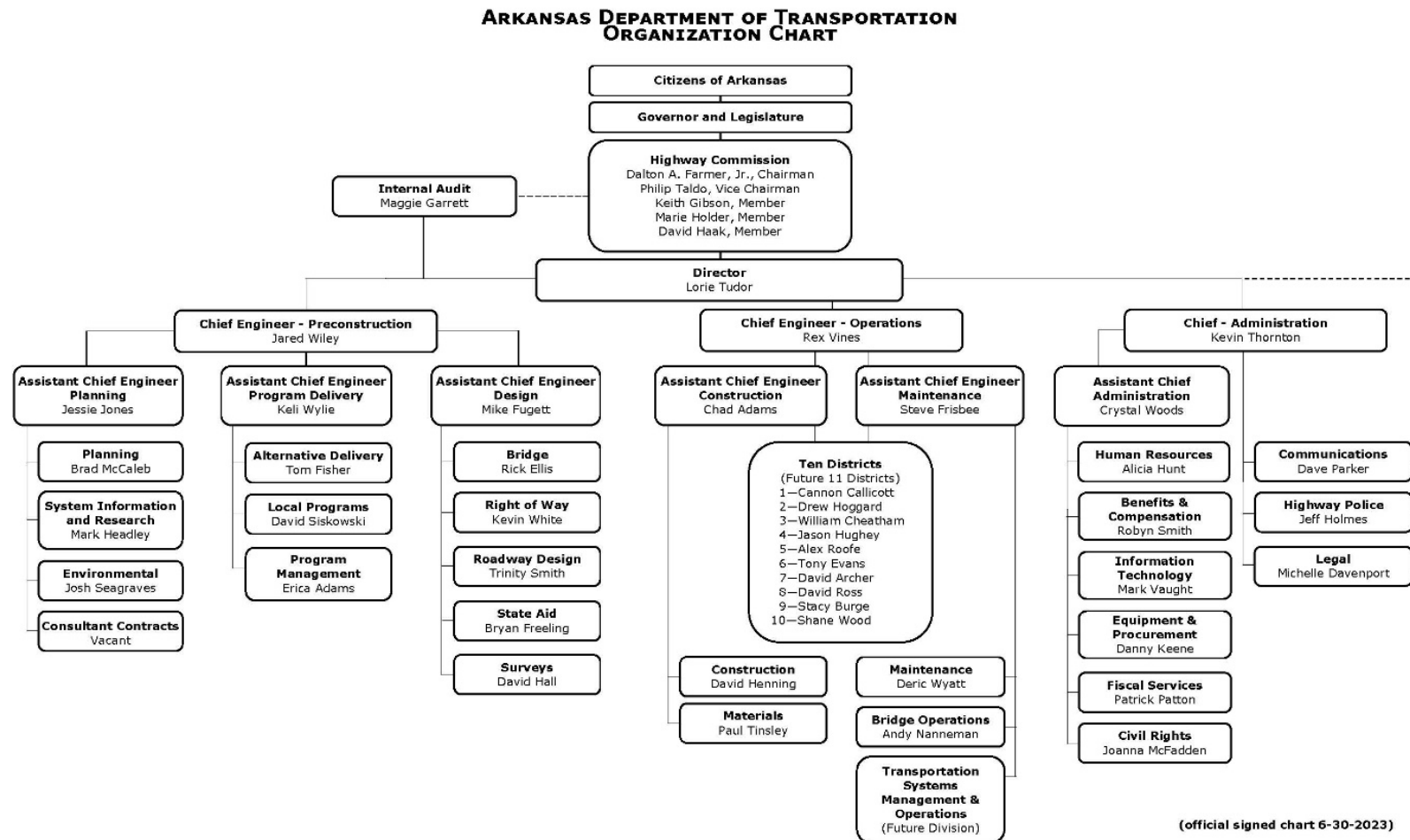
The Department Headquarters, sometimes referred to as central office, is located at 10324 Interstate 30 in Little Rock, Arkansas. The Department's functions are divided between Headquarters and its ten Districts. The Department Headquarters provides statewide oversight, coordination, functional program management, and resource sharing.

The State Highway Commission establishes the total program of Department activities. The Director of Highways, appointed by the Highway Commission, is the constitutional and statutory chief executive officer of the Department. The Director has direct control and management of affairs relating to the state highway system, subject to the Commission's approval. The Director is aided by the Chief Engineer of Operations, Chief Engineer of Preconstruction, Chief Engineer of Administration, and by an advisory group including the General Counsel and the Internal Auditor. Figure 2-1 shows the Department Organization Chart and the overall function of the Department.

In addition to the central office organization, the State is divided into ten Districts to ensure proper supervision and control is exercised at the operations level. The administrative head of each District is the District Engineer (DE), who supervises all construction, maintenance, and other Department activities in a six to eight county area. Their functional program management consists of the District Construction Engineer (DCE) and District Maintenance Engineer (DME). Figure 2-2 shows the geographic areas of the Districts and the location of the District Headquarters. Contact information for each District is in Appendix D.

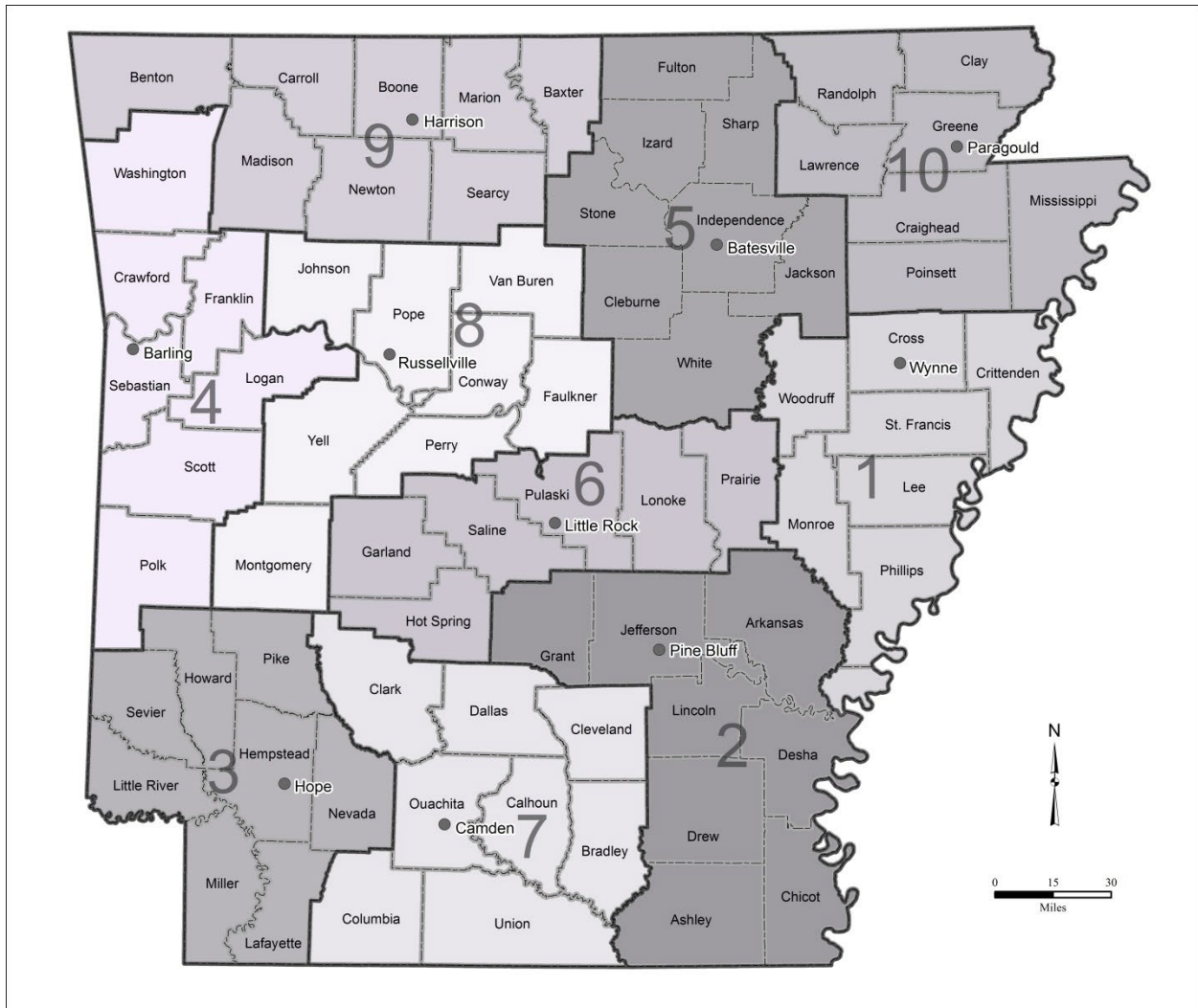
Arkansas Department of Transportation Organization

Figure 2-1



Arkansas Department of Transportation Highway Districts and District Headquarters

Figure 2-2



2.3 Stormwater Management Within The Department

The Permit requires the signature of a principal executive officer as the Responsible Official on the Notice of Intent (NOI) and the designation of a cognizant official. The Responsible Official is the Department's Assistant Chief Engineer-Planning. The cognizant official is the Environmental Division Head. The Natural Resources Section Head in the Environmental Division serves as the contact person for the Permit.

An interdisciplinary standing committee functions as the main working group for development and review of the SWMP and related permitting requirements. Members of the Committee are listed in Table 2-1.

NPDES Standing Committee Table 2-1		
Member	Title	Agency / Division
Andy Tackett	Staff Construction Engineer	ARDOT Construction
Trinity Smith	Division Head	ARDOT Roadway Design
Mina Awadalla	Section Head-Facilities Management	ARDOT Maintenance
Stacy Burge	District Engineer	ARDOT District 9
Blaine Gartrell	Section Head-Utilities	ARDOT Right of Way
Josh Seagraves	Division Head	ARDOT Environmental
Kayti Ewing	Natural Resources Section Head	ARDOT Environmental
Jason Hughey	District Engineer	ARDOT District 4
Tim Yu	Staff Engineer	ARDOT State Aid
Travis House	Staff Maintenance Engineer	ARDOT Maintenance
Chad Davis	District Maintenance Engineer	ARDOT District 4

2.4 Coordination with Other MS4 Stormwater Permittees

In many cases, discharges from the Department stormwater drainage systems flow to stormwater drainage systems owned and operated by other entities, such as counties or municipalities, and vice versa. These entities and the Department are ultimately responsible for the quality of discharge from their own stormwater drainage systems. To comply with the Permit, the Department will strive to ensure pollutants are reduced or controlled in discharges from the Department's stormwater drainage systems into other

MS4s. Permitted MS4 entities are encouraged to do the same for discharges from their facilities into the Department's storm drain system.

The Department coordinates stormwater management activities with municipalities, counties, DEQ, Arkansas Department of Health (ADH), and other entities as necessary or appropriate. Coordination is implemented through formal and informal discussions, meetings, agreements, and procedures. The coordination takes place as follows:

2.4.1 Cooperative Agreements

On an ongoing basis, the Department implements projects to improve or expand the state highway system and support facilities. When local entities' facilities (including stormwater drainage systems) are involved or otherwise impacted, the Department may enter into project-specific cooperative agreements with the local counties and cities that outline both short and long-term roles and responsibilities.

2.4.2 Activities by Other Entities on Department Right of Way

Individuals, corporations, utilities, cities, counties, and other governmental agencies conduct a variety of activities within the Department's highway rights of way. After obtaining Department approval for such work, all agencies, developers, or other entities proposing to conduct any activity within a Department right of way are directed to obtain any required stormwater permits and implement all BMPs required by the permit.

2.4.3 Information Sharing

To accomplish this goal, the Department actively seeks opportunities to share information with other entities and agencies involved with stormwater issues. This coordination includes attendance at formal and informal meetings, stormwater conferences and one-on-one interaction between Department personnel involved with stormwater management and their counterparts at other agencies.

2.4.4 The Technology Transfer Program (T²)

The T² program is available to assist cities and counties in the implementation of transportation related technology. The objective is a safer, more efficient, and more economical road and street program. Targeted operations include construction and maintenance, materials, administration, and computer programs. This program is utilized to share information about stormwater issues with cities and counties statewide.

The T² program is a cooperative effort of the Department, the Federal Highway Administration's Local Technical Assistance Program, and the University of Arkansas at Fayetteville.

2.4.5 Coordination with DEQ

The NPDES Phase II Permit was issued by DEQ, the agency primarily responsible for administration of the NPDES Program in the State. The Department seeks to work closely with DEQ to resolve issues on an informal basis, when possible. Coordination is accomplished through several mechanisms, including:

- a. Annual reporting
- b. Notification of noncompliance (notification and follow-up reports for reportable noncompliance)
- c. Notification of spills
- d. Meetings
- e. Informal interactions

2.4.6 Coordination with the Public

The Department point of contact for stormwater issues is the Natural Resources Section, Arkansas Department of Transportation, P.O. Box 2261, Little Rock, Arkansas 72203, (501) 569-2522, or email EnvironmentalStormwater@ardot.gov. Public interaction concerning stormwater will occur through the following primary mechanisms:

- 1) *A stormwater section of the Department website to present information on stormwater issues, including the statewide SWMP, annual reports, and how the public can participate in stormwater clean-up activities, such as Adopt-A-Highway litter control. This site will also offer the opportunity for public comments, complaints, suggestions, and requests.*
- 2) *The statewide SWMP updates will be made available for a public comment period.*
- 3) *Public initiated contact with the ten District offices regarding local complaints, suggestions, and requests. The IDrive Arkansas app and website provide a convenient comment/complaint venue for the public.*
- 4) *Public input on proposed projects during the environmental evaluation process. Typically, one or more public meetings are held for major highway projects. Comments received from the public will be addressed through the environmental and design process.*
- 5) *Published educational material on stormwater related issues for Department employees, contractors, and personnel using Department facilities. The mechanisms will include ARDOT publications for Department employees, stormwater education handouts for employees and contractors, and information for the traveling public at Welcome Centers.*

3 BEST MANAGEMENT PRACTICES

A stormwater best management practice (BMP) is a technique, measure, or structural control used for a given set of conditions to manage the quantity and/or improve the quality of stormwater runoff in the most cost-effective manner.

The BMPs chosen for this SWMP were selected for implementation to reduce the discharge of pollutants from the Department's storm sewer system. The term "BMP" is used in this document to refer to operational activities or physical controls that are applied to stormwater or other runoff to reduce the discharge of pollutants. Accordingly, BMP refers to both structural and non-structural controls that have direct or indirect effects on the release, transport, or discharge of pollutants.

3.1 Structural BMPs

These are engineered and constructed systems that are designed to provide for water quantity and/ or water quality control of stormwater runoff. They include the following general categories:

- **Infiltration systems** capture a volume of runoff, allowing it to infiltrate into the ground.
- **Detention systems** capture a volume of runoff and temporarily retain that volume for subsequent release. Detention systems do not retain a significant permanent pool of water between runoff events.
- **Retention systems** capture a volume of runoff and retain that volume until it is displaced in part or in total by the next runoff event. Retention systems therefore may maintain a significant volume of water between runoff events.
- **Constructed wetland systems** are similar to retention and detention systems, except that a major portion of the BMP water surface area (in pond systems) or bottom (in meadow-type systems) contains wetland vegetation. This group also includes wetland channels.
- **Filtration systems** use some combination of a granular filtration media such as sand, soil, organic material, carbon, or membrane to remove constituents found in runoff.
- **Vegetated systems (biofilters)** such as swales and filter strips are designed to convey and treat either shallow flow (swales) or sheet flow (filter strips) runoff.
- **Minimizing directly connected impervious surfaces** describes a variety of practices that can be used to reduce the amount of surface area directly connected to the storm drainage system by minimizing or eliminating traditional curb and gutter.

- **Miscellaneous and vendor-supplied systems** include a variety of proprietary and miscellaneous systems that do not fit under any of the above categories. These include catch basin inserts, hydrodynamic devices, and filtration devices.

3.2 Non-Structural BMPs

These are institutional and pollution prevention practices designed to prevent pollutants from entering stormwater runoff or reduce the volume of stormwater requiring management. Non-structural BMPs in use at the Department fall into the following categories:

- **Education** of Department employees, contractors, and the public can be an effective and inexpensive stormwater management strategy. When effectively implemented, education programs can help to clarify common misconceptions of stormwater issues and raise awareness of the valuable functions that a stormwater management program could provide to communities in Arkansas.
- **Source control** information can be provided to Department employees and the public to identify sources of non-point source pollution, control measures available, and the steps that employees and the public can take to reduce the impacts of their activities on water quality. Most communities are unaware of the sources and control measures for urban non-point source pollution.
- **Recycling** is another activity that can significantly reduce the impacts to water quality.
- **Maintenance practices** are necessary to reduce the pollutant contribution from Department facilities and roadways and to ensure that stormwater collection and treatment systems are operating as designed.

3.3 BMP Adoption Procedures

Many of the BMPs described in this SWMP have been in use for several years and others have been adopted more recently. The Department periodically evaluates BMPs and adds or deletes practices based on the most current information available to do the best job at the lowest possible cost.

The NPDES Standing Committee has the responsibility to evaluate all proposed temporary BMPs before making recommendations to the Specification Committee for possible adoption. Some criteria used to accept or reject a BMP include the effectiveness of the BMP at the subject site, a cost/benefit comparison, technical feasibility, safety, maintenance requirements, effects on other resources, and adherence to local, state, and federal regulations. A description of each consideration is provided below.

- **BMP effectiveness** - A proposed BMP should meet its goal for pollution control benefits the BMP was designed to provide. The suitability of the project site to the BMP should be considered. Some important site characteristics are soil type,

watershed area, depth to bedrock, site size, and water table. If these conditions are not suitable, then the BMP can lose its effectiveness, require excessive maintenance, or quit working after a short while.

- **BMP cost/benefit comparison** - The pollution control benefits should have a reasonable relationship to the cost of the BMP. Economics is an important consideration in the selection of BMPs to achieve the water quality goal at the least cost. To properly compare alternatives, all costs for the design life of a BMP should be included. These include expected maintenance costs as well as initial costs for land, engineering, and construction. Other economic considerations may be applicable, including increased property value as a result of the construction of an attractive detention pond, incidental wildlife, or recreational benefits.
- **Technical feasibility and safety** - The Department should be able to implement the BMP utilizing Department resources and within a reasonable amount of time. In addition, the Department should be able to implement the BMP without compromising the safety of Department workers or the public.
- **Maintenance requirements** - The initial design phase of a BMP should take maintenance considerations into account. Most structural BMPs will require periodic maintenance, such as disposal of sediment and debris. Locations for the disposal of sediment and debris should also be considered during the design phase.
- **Adherence to regulations** - A proposed BMP should not adversely affect the Department's compliance with local, state, and federal regulations.
- **Impacts on other resources** - A BMP can directly affect other resources. Without proper design and planning, a BMP can simply shift a water quality problem elsewhere. Improperly designed BMPs can affect groundwater, wildlife, stream quality, and aesthetics.

3.4 BMP Implementation

No single BMP can address all stormwater problems. Each type has certain limitations based on drainage area served, available land space, cost, and pollutant removal efficiency. A variety of site-specific factors are also considered such as soil types, slopes, depth of groundwater table, etc. Careful consideration of these factors is necessary to select the appropriate BMP or group of BMPs for a particular location.

Under the Phase II regulations, the Department is required to implement a stormwater management program that includes, at a minimum, the six minimum control measures (MCM) listed below:

- **Public Education and Outreach**
- **Public Involvement and Participation**
- **Illicit Discharge Detection and Elimination**
- **Control of Construction Site Runoff**
- **Post-Construction Stormwater Management**
- **Pollution Prevention and Good Housekeeping**

The rule gives the Department the flexibility to choose the BMPs for each measure as appropriate for operations. However, the chosen BMPs and measurable goals must result in effective control of pollutants in stormwater runoff. Otherwise, the permitting authority may require changes in the chosen mix of BMPs and measurable goals to result in a more effective program. The BMPs selected by the Department to implement these minimum measures, along with their related measurable goals, are described in Section 4 through Section 9 of this document.

4 PUBLIC EDUCATION AND OUTREACH

An informed and knowledgeable community is important for the success of a stormwater management program. When the public understands the need for and importance of stormwater management, it ensures greater support for the program. Stormwater impacts are reduced when the public becomes aware of individual actions to protect or improve water quality.

4.1 Permit Requirements

The Department will implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities. These will include but are not limited to the impact of stormwater discharges and pollution prevention steps the public can take to reduce polluted runoff. As a non-traditional MS4, the Department is required to provide educational materials and outreach to its employees, contractors, and individuals using the Department's facilities.

4.2 Rationale Statement

As a non-traditional MS4, the Department's audiences for the purpose of this MCM are Department employees, contractors working on construction and maintenance projects within the Department's right of way, and the motorists who utilize Department facilities. The Department uses multiple mechanisms to achieve the goals of this MCM since a targeted approach is likely to reach and be relevant to the maximum number of people comprising these groups.

The Stormwater section of the Department's website, the Department's recurring publications, and distribution of educational material will be used for Department employees. Contractors who perform most earth disturbing activities on Department projects can best be reached through educational handouts and training opportunities which emphasize erosion and sediment control and waste management on construction jobs. The general public who visit the Welcome Centers are a transient population and are best reached through the distribution of educational material emphasizing proper disposal of waste, control of oil leaks from vehicles, and litter control. The Department is an active member of the Keep Arkansas Beautiful Commission and normally makes a substantial cash contribution to the Keep Arkansas Beautiful Foundation for use in conducting the Great Arkansas Cleanup Campaign. Additionally, storm drain outfalls which discharge off-site at all District Headquarters, Welcome Centers, and Tourist Information Centers have permanent decals affixed which contain warnings against dumping waste.

All printed educational material and the Department's website contain hotline numbers and information necessary to report littering and provide a means for contacting the Department with concerns, questions, or suggestions about environmental matters. While not a part of the formal MS4 program, the Department will use opportunities to reach other

segments of the State's population through the distribution of educational material at various events and meetings and through presentations to civic groups, students, and other events.

The success of this MCM is measured by feedback from the target audiences, a decrease in the pollution from targeted sources, construction site visit reports, and citizen participation in the form of hotline or website communications. Each BMP is reviewed annually to determine if the practice needs to be revised or replaced.

The Permit requires the Department to estimate the number of people to be contacted through the outreach strategy. The Department goal for the Public Education and Outreach program is to reach at least 8,000 people during the life of the Permit.

4.3 Public Education and Outreach on Stormwater Impacts-Implementation Plan

The Department will implement the following BMPs to achieve compliance with the requirements of MCM One, Public Education and Outreach.

4.3.1 Stormwater Educational Material (BMP 1.1)

<i>BMP Contact:</i>	Natural Resources Section
<i>Target Audience:</i>	District construction and maintenance personnel, contractors, traveling public.
<i>Target Pollution Sources:</i>	Illicit discharges, sediment, litter, motor oil, and waste from construction activities.
<i>Description:</i>	Develop and/or distribute informational handouts to District Construction and Maintenance personnel and the public at Welcome Centers and selected educational events/venues as requested. Post selected material on the Department's website.
<i>Measurable Goals:</i>	<p>Years 1-5. Provide ARDOT Stormwater Brochure for the public at all Welcome Centers; make annual distribution of brochures at educational events/venues as requested; maintain brochures at District permit offices across the state.</p> <p>Provide targeted handouts or digital access to District construction and maintenance personnel during formal training on topics such as preventing erosion and controlling sediment.</p>

Ensure District offices including the permit officer have stormwater brochures, information on concrete waste management, and prevention of erosion and sediment control to distribute to permittees and contractors.

4.3.2 Stormwater Information on Website (BMP 1.2)

<i>BMP Contact:</i>	Natural Resources Section
<i>Target Audience:</i>	Department employees, general public
<i>Target Pollution Sources:</i>	Sediment, vehicle fluids, litter, illicit discharges
<i>Description:</i>	The internet is an effective method of public education and involvement through the distribution of stormwater program information to internal and external audiences. The website will contain the Department's SWMP and educational material for various audiences on the effects of pollution from stormwater discharges.
<i>Measurable Goals:</i>	Maintain current Department stormwater educational material on the website. Post new material as it is developed.

4.3.3 Public Feedback on Dept. Activities (BMP 1.3)

<i>BMP Contact</i>	Natural Resources Section
<i>Target Audience</i>	Department employees, general public
<i>Target Pollution Sources</i>	Various
<i>Description</i>	A public hotline and website is available for employees and the general public to comment, ask questions, or express concerns regarding Department stormwater management. A staff member answers this number during normal work hours. The hotline number is published in educational brochures and is included on the Department's website.
<i>Measurable Goals</i>	Document and respond to all hotline calls.

4.3.4 Spanish Stormwater Material (BMP 1.4)

<i>BMP Contact</i>	Natural Resources Section
<i>Target Audience</i>	Spanish speaking members of the public
<i>Target Pollution Sources</i>	Various
<i>Description</i>	Spanish translations of selected stormwater material will be made available on the Department's website.
<i>Measurable Goals</i>	Years 1-5. Maintain at least three Spanish language publications on the Department's website.

4.3.5 Storm Drain Marking at ARDOT Facilities (BMP 1.5)

<i>BMP Contact</i>	Natural Resources Section
<i>Target Audience</i>	Department Employees
<i>Target Pollution Sources</i>	Materials produced by vehicle maintenance activities
<i>Description</i>	Make at least 50 staff visits to ARDOT facilities during the term of the Permit and affix permanent stormwater education messages onto stormwater outfalls which discharge off site.
<i>Measurable Goals</i>	Visit 10 ARDOT facilities during each year of the Permit and install permanent stencils or decals at stormwater outfalls which discharge off-site.

4.3.6 Department Recurring Publications (BMP 1.6)

<i>BMP Contact</i>	Natural Resources Section
<i>Target Audience</i>	All Department Employees
<i>Target Pollution Sources</i>	Dependent on subjects selected
<i>Description</i>	Publish and distribute recurring publications to all Department employees. Include information on a subject of general environmental interest in one of these publications on at least an annual basis.
<i>Measurable Goals</i>	Provide Department employees with information on a subject of general environmental interest in a Department publication during each year of the Permit.

4.4 Public Education and Outreach Summary and Schedule

Table 4-1 provides a summary of measurable goals of each BMP for MCM One.

PUBLIC EDUCATION AND OUTREACH BMPS AND MEASURABLE GOALS TABLE 4-1	
BMP Number/Name	Measurable Goal
1.1 Stormwater Educational Material	Years 1-5. Provide ARDOT Stormwater Brochure for the public at all Welcome Centers; make annual distribution of brochures at educational events/venues as requested; maintain brochures at District permit offices across the state. Provide targeted handouts or digital access to District construction and maintenance personnel during formal training on topics such as preventing erosion and controlling sediment.
1.2 Stormwater Information on Website	Maintain current Department stormwater educational material on the website. Post new material as it is developed.
1.3 Public Feedback on Department. Activities	Document and respond to all hotline calls.
1.4 Spanish Stormwater Educational Material	Years 1-5. Maintain at least three Spanish language publications on the Department's website.
1.5 Storm Drain Marking at ARDOT Facilities	Visit 10 ARDOT facilities during each year of the Permit and install permanent stencils or decals at stormwater outfalls which discharge off-site.
1.6 Department Recurring Publications	Provide Department employees with information on a subject of general environmental interest in a Department publication during each year of the Permit.

5 PUBLIC INVOLVEMENT AND PARTICIPATION

An active and involved community is important to the success of the stormwater management program. It allows for broader public support, since citizens who participate in the development or implementation of the SWMP are partners in the program. Therefore, involved citizens are likely to take an active role in pollution prevention, create cross-connections, and develop community and governmental relationships to the benefit of the Department's stormwater program.

5.1 Permit Requirements

The Department will at a minimum, comply with State and local public notice requirements when implementing a public involvement/participation program. As a non-traditional MS4, the Department will involve employees, on-site contractors, and individuals using the Department's facilities.

5.2 Rationale Statement

The Department's audiences for this MCM are Department employees, contractors working on construction projects within the Department's right of way, and the public who use Department facilities. Because of the diverse nature of the audiences, several avenues for public involvement and participation have been selected to implement this MCM. The SWMP is posted on the Department website and public notice of the plan will be published in a newspaper of statewide circulation. This will give the general public, employees, and contractors the opportunity to review the document and submit comments.

Within the Department, the NPDES Standing Committee will continue to provide oversight of the ARDOT stormwater program. The committee brings together representatives from various functional areas within the Department involved in activities that can impact stormwater discharges. This group includes designers, construction staff, maintenance staff, utilities, facilities management, field personnel, and others. This diversity ensures major stakeholders in stormwater management within the Department have joint ownership of the program.

The general public is afforded the opportunity to partner with the Department in pollution prevention and remediation through two programs. The first is the ARDOT Litter Hotline and website whereby the public can report littering to the Arkansas Highway Police, resulting in a letter to the suspected violator. The second is the Adopt-A-Highway Program which encourages groups of citizens to adopt a section of roadway and remove litter from the area on a periodic basis.

Since the majority of earth disturbing activities within the Department's right of way is performed by contractors, their involvement in stormwater management is important to the program's success. The Department has pre-construction conferences for contracted

projects, which have District oversight; so the contractor and Department personnel can coordinate on each project and comply with the Construction Stormwater General Permit. This compliance includes the Stormwater Pollution Prevention Plan (SWPPP) and addressing potential pollutant problems with the contractor before work commences. This allows potential problems to be identified before work commences and gives the contractor a voice in the SWPPP implementation.

The success of this MCM is measured using BMPs with quantifiable goals based on actual versus planned achievements. Each BMP will be assessed before the submission of the annual report to determine if there is any evidence that the practice needs to be revised or replaced.

5.3 Public Involvement and Participation-Implementation Plan

The Department will implement the following BMPs to achieve compliance with the requirements of MCM Two, Public Involvement and Participation:

5.3.1 Public Notice of Stormwater Management Program (BMP 2.1)

<i>BMP Contact</i>	Natural Resources Section
<i>Target Audience</i>	Department employees, general public, contractors
<i>Target Pollution Sources</i>	N/A
<i>Description</i>	When updated, the Department will publish a public notice of the Stormwater Management Program in a newspaper with statewide circulation and request comments on the Program. The completed draft of the document will be available on the Department website during the life of the Permit. These measures will give the public an opportunity to comment on the program. The Department will consider all public comments and incorporate valid ideas into the SWMP.
<i>Measurable Goals</i>	Provide the draft SWMP for public comment when updated and post the final SWMP on the Department website.

5.3.2 Involvement with Other Entities (BMP 2.2)

<i>BMP Contact</i>	Natural Resources Section
<i>Target Audience</i>	Stormwater related public and private entities
<i>Target Pollution Sources</i>	N/A

<i>Description</i>	To accomplish this goal, the Department will seek opportunities to share information with other entities and agencies involved with stormwater issues. This coordination includes attendance at formal and informal meetings, stormwater conferences, and one-on-one interaction between Department personnel involved with stormwater management and their counterparts at other agencies.
<i>Measurable Goals</i>	Sponsor or participate in at least five activities with other public or private groups during the permit cycle.

5.3.3 Maintain SWMP on Website (BMP 2.3)

<i>BMP Contact</i>	Natural Resources Section
<i>Target Audience</i>	Department employees, general public, contractors
<i>Target Pollution Sources</i>	N/A
<i>Description</i>	The SWMP, annual reports, and associated material will be maintained on the Department website during the life of the permit. This will let the public, Department employees, and contractors educate themselves on the goals and activities of the Program. In addition, it will provide a forum for participation by any interested parties.
<i>Measurable Goals</i>	Publish SWMP and associated documents on the Department website during the life of the permit.

5.3.4 Sponsor Adopt-A-Highway Program (BMP 2.4)

<i>BMP Contact</i>	District Engineer
<i>Target Audience</i>	General public
<i>Target Pollution Sources</i>	Floatables, other litter
<i>Description</i>	The Department sponsors the Adopt-A-Highway program which enables volunteer groups to adopt a section of State highway for the purpose of litter control. The object of the program is to increase public awareness of the litter problem, to promote public involvement, and to help prevent floatables and other litter from entering State

waters. As sponsor for the program, the Department coordinates cleanup activities with the adopting group, furnishes safety vests and litter bags, disposes of the litter, and erects signs to provide public recognition for the adopting group.

Measurable Goals

The Department will publicize the program through the website, distribution of applications at public meetings, and on highway signs. The goal is to keep at least 6500 people involved in the program during the permit cycle.

5.3.5 Litter Hotline and Reporting (BMP 2.5)

BMP Contact

Arkansas Highway Police/Public Information

Target Audience

Driving public, Department employees

Target Pollution Sources

Floatables, other litter

Description

A 24-hour, toll-free public telephone hotline called the Litter Reporting Hotline will be maintained. Anyone witnessing a littering violation along any State highway can call 1-866-811-1222 to report it. The Arkansas Highway Police (AHP) answered calls and reported incidents are documented. In addition, the IDrive Arkansas website and app allows any individual to submit a littering report online. A letter is then sent to the registered vehicle owner regarding the suspected violation if a valid license plate number is included with the complaint. Information about recurring violations by the same vehicle will be tracked and could result in a visit by an AHP officer to investigate the problem. Although the goal is to stop the roadside littering, not to issue citations, repeat offenders can be subject to enforcement action through Arkansas' anti-litter laws.

Measurable Goals

Document calls/online reports to the hotline will be documented and send a letter to each reported violator where the identity and address of the registered owner can be ascertained.

5.3.6 NDPES Standing Committee (BMP 2.6)

BMP Contact

Committee Chair, Environmental Division

<i>Target Audience</i>	Department employees
<i>Target Pollution Sources</i>	All stormwater pollutants
<i>Description</i>	The NPDES Standing Committee is an interdisciplinary group, which provides oversight of stormwater management within the Department. The group meets as necessary to propose and evaluate changes to stormwater policy and procedures and, where appropriate, recommend their adoption to the Department's senior management. A committee representing various ARDOT Divisions will be maintained during the life of the Permit. Members of the Committee are shown in Table 2-1.
<i>Measurable Goals</i>	All SWMP activities including required annual reports and other MS4 permit related actions will be reviewed and approved by the committee before adoption. Minutes of the meetings will be maintained.

5.3.7 Pre-Construction Conference With Contractors (BMP 2.7)

<i>BMP Contact</i>	District Construction Engineer
<i>Target Audience</i>	Department employees, contractors
<i>Target Pollution Sources</i>	Sediment, construction wastes
<i>Description</i>	The Resident Engineer will host a Pre-Construction Conference before work begins on contracted jobs with District oversight. During the meeting, NPDES requirements and potential issues with stormwater management will be discussed.
<i>Measurable Goals</i>	A Pre-Construction Conference is to be held for all contracted jobs with District oversight.

5.4 Public Involvement and Participation Summary and Schedule

Table 5-1 provides a summary of measurable goals of each BMP for MCM Two.

PUBLIC INVOLVEMENT AND PARTICIPATION BMPS AND MEASURABLE GOALS TABLE 5-1	
BMP Number/Name	Measurable Goal
2.1 Public Notice	Provide the draft SWMP public comment when updated and post the final SWMP on the Department website.
2.2 Involvement With other Entities	Sponsor or participate in at least five activities with other public or private groups during the permit cycle.
2.3 Maintain SWMP on Website	The SWMP, annual reports, and associated material will be maintained on the Department website during the life of the permit. This will let the public, Department employees and contractors educate themselves on the goals and activities of the Program. In addition, it will provide a forum for participation by any interested parties.
2.4 Adopt-A-Highway Program	The Department will publicize the program through the website, distribution of applications at public meetings, and on highway signs. The goal is to keep at least 6500 people involved in the program during the permit cycle.
2.5 Litter Hotline and Reporting	All calls/online reports to the hotline will be documented and a letter will be sent to each reported violator where the identity and address of the driver can be ascertained.
2.6 NPDES Standing Committee	All SWMP activities including required annual reports and other MS4 permit related actions will be reviewed and approved by the committee before adoption. Minutes of the meetings will be maintained.
2.7 Pre-Construction Meeting with Contractors for New Projects	A Pre-Construction Conference is to be held for all contracted jobs with District oversight.

6 ILLICIT DISCHARGE DETECTION AND ELIMINATION

The NPDES Final Phase II Rule requires small MS4s to develop, implement, and enforce an illicit discharge detection and elimination program. Illicit discharges can enter the storm drain system through either direct connections (e.g., wastewater piping either mistakenly or deliberately connected to the storm drains) or by other means (e.g., infiltration into the MS4 from cracked sanitary systems, spills collected by drain outlets, paint or used oil dumped directly into a drain). In either case, the result is untreated discharges that contribute high levels of pollutants, including heavy metals, toxics, oil and grease, solvents, nutrients, viruses and bacteria to receiving water bodies. Pollutant levels from these illicit discharges have been shown in EPA studies to be high enough to significantly degrade receiving water quality and threaten aquatic life and human health.

6.1 Permit Requirements

The Department shall develop, implement and enforce a program to detect and eliminate illicit discharges, as defined in Part VI of the Permit, into the small MS4 (for illicit discharges to the MS4 via an adjacent, outside of the MS4's jurisdiction, interconnected MS4, the MS4 are only required to inform the neighboring MS4 and DEQ in the annual report submission of their existence);

The Department shall update the storm sewer system map(s), showing the location of outfalls, and the name and location of surface waters of the State that receive discharges from those outfalls within five years of when the coverage under this general permit was granted. The storm sewer system map shall also include the entire MS4 system, including catch basins, pipes, ditches, and public and private stormwater facilities. MS4s with urban areas with a population of at least 50,000 people increases resulting from the most recent census defined urban areas with a population of at least 50,000 people must update their storm sewer maps within three years of the permit's effective date;

The Department shall to the extent allowable under State or local law, effectively prohibit through ordinance, or other regulatory mechanism, illicit discharges into the storm sewer system and implement appropriate enforcement procedures and actions;

The Department shall review and update the illicit discharge reporting protocol as needed to assist in the detection and elimination of non-stormwater discharges, including illegal dumping, to the system.

The Department shall inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste; and

The Department shall address the following categories of non-stormwater discharges or flows (i.e., illicit discharges) only if the MS4 identifies them as significant contributors of pollutants to the small MS4: uncontaminated water line flushing, landscape irrigation, diverted stream flows, rising ground waters, uncontaminated ground water infiltration (as

defined at 40 CFR 35.2005(20)), uncontaminated pumped ground water, discharges from potable water sources, uncontaminated foundation drains, air conditioning condensation, irrigation water, springs, water from crawl space pumps, uncontaminated footing drains, lawn watering, individual residential car washing, flows from riparian habitats and wetlands, de-chlorinated swimming pool discharges, uncontaminated street wash water, and discharges or flows from emergency firefighting activities (by definition, not an illicit discharge) and splash pads.

The Department may also develop a list of other similar occasional incidental non-stormwater discharges (e.g., non-commercial or charity car washes, etc.) that will not be addressed as illicit discharges. These non-stormwater discharges must not be reasonably expected (based on information available) to be significant sources of pollutants to the MS4, because of either the nature of the discharges or conditions the MS4 have established for allowing these discharges to the MS4 (e.g., a charity car wash with appropriate controls on frequency, proximity to sensitive water bodies, BMPs on the wash water, etc.). The MS4 must document in the SWMP any local controls or conditions placed on the discharges. The MS4 must include a provision prohibiting any individual non-stormwater discharge that is determined to be contributing significant amounts of pollutants to the MS4.

6.2 Rationale Statement

The Department's plan to implement this MCM will rely on both the detection/elimination of existing discharges and minimizing future problems through employee training, storm drain marking, and distribution of educational material.

The Department has completed the data collection for all stormwater outfalls within the designated small MS4 areas defined by the 2000, 2010, and 2020 U.S. Census Bureau. The drainage system is mapped using hand-held GNSS (Global Navigation Satellite Systems) units and stored within the Environmental Division's "NPDES Enterprise Feature Dataset" that includes features of previously monitored dry weather screening, illicit discharge reporting, outfalls, and tracking of stormwater flow path along both sides of all state-owned roads/highways. Applications have been developed from the Enterprise Feature Dataset to improve data collection processes and stewardship as well as retain institutional knowledge.

Changes to the MS4 collection system caused by new construction, modifications to existing roadways, newly designated MS4s, or any other reason will be documented and the system maps will be updated accordingly, prior to the expiration of the Permit.

Initial screening of the MS4 system for illicit discharges has been completed and screening of additional DEQ designated areas will be completed within three year of the MS4 designation. The maintenance personnel who work on the Department's roadways daily will spearhead the ongoing effort to identify and eliminate future illicit discharges. Any dry weather flow where the source is questionable will be evaluated in the field for such things as color, odor, and clarity. Field testing for selected parameters will be done

by the Natural Resources team members using portable test equipment as circumstances dictate. If these measures indicate a probable illicit discharge, the location will be recorded on GPS units by the inspection team along with any other pertinent information needed for follow-up.

Since the Department does not have regulatory authority to eliminate illicit discharges into its MS4 system, it relies on assistance from agencies which do have such authority. A Memorandum of Understanding has been signed and is in effect with the ADH to deal with discharges from septic systems or home sewage treatment systems. The DEQ assists in the investigation of other kinds of discharges when necessary. Since the discharge source may be located within the boundary of another Regulated Small MS4 System, the Department may seek the assistance of the MS4 operator to help eliminate these discharges. Specific procedures are shown in the Department's Illicit Discharge Reporting Protocol.

Dry weather screening for illicit discharges is a permit requirement and a good initial step toward the goals of the program, but it will not detect new discharges over the long term. The Department will rely primarily on maintenance personnel who work on the roadways daily to identify new illicit discharges. The illicit discharge training program and educational handouts have given these employees the knowledge needed to perform this function. Training for this MCM is conducted along with the Facility PPP and spill prevention, control, and countermeasures (SPCC) Training BMP under the Pollution Prevention/Good Housekeeping MCM. In addition, the training covers how to prevent or correct situations at Department facilities, which might lead to illicit discharges and how to remediate spills and leaks if they occur.

Members of the Natural Resources Section will visit 50 Department facilities during the term of the Permit. During the visits, they will work with supervisors to identify and eliminate any potential or actual discharges of chemicals or other pollutants from the facility. Additionally, markers or stencils containing a reminder that the drain leads to a water body will be affixed near selected stormwater outfalls during these visits.

The Department will involve the general public in this effort by providing a hotline number, IDrive Arkansas website/app, and a stormwater website form to report illicit discharges to the agency. If a complaint is valid, it will be handled according to the Illicit Discharge Reporting Protocol. The web address and hotline numbers are included in the stormwater educational material intended for distribution to the general public. The driving public is targeted through educational and storm drain marking BMPs designed to satisfy the requirements of MCM One: Public Education and Outreach. Brochures with information on pollution prevention measures are distributed at Welcome Centers, Tourist Information Centers, District Offices, and at educational events. The marked storm drain outfalls, which discharge off-site at Welcome Centers and Tourist Information Centers, serve as a reminder that the drain leads to a waterbody to encourage responsible behavior in waste disposal.

The success of this MCM is measured by miles of MS4 system mapped each year, the number of outfalls screened, number of personnel trained, and number of ARDOT facilities visited. Over time, the Department would expect the program to result in fewer illicit discharges within its MS4 system or at its facilities.

6.3 Illicit Discharge Detection and Elimination-Implementation Plan

The Department will implement the following BMPs to achieve compliance with the requirements of MCM Three, Illicit Discharge Detection and Elimination:

6.3.1 Stormwater Sewer System Outfall Collection and Mapping (BMP 3.1)

<i>BMP Contact</i>	Natural Resources Section
<i>Target Audience</i>	N/A
<i>Target Pollution Sources</i>	N/A
<i>Description</i>	The Department will use GPS units and mapping software to record stormwater outfalls and the storm sewer drainage system located in the MS4s designated by Part I 2.A.b. as designated by DEQ.
<i>Measurable Goals</i>	Map additional MS4 areas (stormwater outfalls and the drainage system) as added as designated by Part I 2.A.b. of the permit.

6.3.2 Dry Weather Inspections of Outfalls (BMP 3.2)

<i>BMP Contact</i>	Natural Resources Section
<i>Target Audience</i>	N/A
<i>Target Pollution Sources</i>	Illicit discharges
<i>Description</i>	The Department will perform dry weather screening of the storm sewer system located in the MS4 urban areas with a population of at least 50,000 peoples during the Permit term. In addition, the newly added areas as a result of DEQ designation will be completed within 3 years. Dry weather flows suspected of being illicit discharges will be evaluated using field screening and testing of selected parameters. The location of actual illicit discharges will be recorded and the actions taken to terminate the discharge.

<i>Measurable Goals</i>	Dry weather screen approximately 20 percent of the MS4 system each year of the permit cycle. New MS4 areas resulting from DEQ designation will be screened within 3 years. Action will be taken to eliminate illicit discharges.
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6.3.3 Statewide Employee Training Program (BMP 3.3)

<i>BMP Contact</i>	Natural Resources Section and District Maintenance Engineer
<i>Target Audience</i>	District maintenance employees
<i>Target Pollution Sources</i>	Illicit Discharges
<i>Description</i>	Illicit discharge training will be provided for District maintenance personnel.
<i>Measurable Goals</i>	Train appropriate district maintenance personnel during each year of the permit.

6.3.4 Citizen Reporting of Suspected Illicit Discharges (BMP 3.4)

<i>BMP Contact</i>	Natural Resources Section
<i>Target Audience</i>	General public
<i>Target Pollution Sources</i>	Illicit discharges, dumping
<i>Description</i>	A public hotline and website reporting form is available and publicized for citizens to communicate about known or suspected illicit discharges within the Department's MS4.
<i>Measurable Goals</i>	Document complaints received and follow the Illicit Discharge Reporting Protocol to identify illicit discharges for elimination.

6.3.5 Statewide Department Facility Staff Assistance Visits (BMP 3.5)

<i>BMP Contact</i>	Natural Resources Section
<i>Target Audience</i>	Area maintenance supervisors

<i>Target Pollution Sources</i>	Actual or potential illicit discharges
<i>Description</i>	The Department's Natural Resources Section will visit 50 maintenance facilities during the term of the Permit to provide staff assistance on the facility pollution prevention plan implementation. During the visits, an illicit discharge survey of the facility will be performed in conjunction with maintenance supervisors.
<i>Measurable Goals</i>	Visit 10 Department maintenance facilities each year of the Permit and document outfalls screened for compliance with Part III C.i.(1).

6.3.6

<i>BMP Contact</i>	Natural Resources Section
<i>Target Audience</i>	N/A
<i>Target Pollution Sources</i>	Illicit discharges
<i>Description</i>	The Department will incorporate new technology, equipment, or mapping software to assist in identifying and eliminating illicit discharges
<i>Measurable Goals</i>	<p>Year 1, the Environmental Division will research and request funds for the purchase of additional field testing equipment, technology, or mapping software to be used in dry weather screening.</p> <p>Years 2-5, new technology, equipment, or mapping software will be incorporated during Year 2 and used for the remainder of the Permit term.</p>

6.4 Illicit Discharge Detection and Elimination Summary and Schedule

Table 6-1 provides a summary of measurable goals of each BMP for MCM Three.

ILLICIT DISCHARGE DETECTION AND ELIMINATION BMPs AND MEASURABLE GOALS TABLE 6-1	
BMP Number/Name	Measurable Goal
3.1 Storm Sewer System Mapping	Map additional MS4 areas (stormwater outfalls and the drainage system) as added as designated by Part I 2.A.b. of the permit.
3.2 MS4 System Dry Weather Field Screening	Dry weather screen approximately 20 percent of the MS4 system each year of the permit cycle. New MS4 areas resulting from DEQ designation will be screened within 3 years. Action will be taken to eliminate illicit discharges.
3.3 Statewide Maintenance Employee Training	Train appropriate district maintenance personnel during each year of the permit.
3.4 Citizen Reporting of Suspected Illicit Discharges	Document complaints received and follow the Illicit Discharge Reporting Protocol to identify illicit discharges for elimination.
3.5 Maintenance Facility Staff Visits	Visit 10 Department maintenance facilities each year of the Permit and document outfalls screened for compliance with Part III C.i.(1).

7 CONSTRUCTION SITE STORMWATER MANAGEMENT

The Department has a well-established process to obtain construction stormwater permits and to develop and implement Stormwater Pollution Prevention Plans (SWPPPs) for each eligible construction job. The Department largely relies on this process to ensure the goals of the NPDES Phase II construction program are met. For contracted jobs, the Roadway Design Division or State Aid Division work to ensure the SWPPP contains everything required to accomplish the goal of minimizing the discharge of sediment from construction sites. For construction or maintenance jobs performed by Department personnel, a similar process occurs with Districts developing the SWPPP in coordination with the Environmental Division. After construction commences, the Districts are responsible for implementing the SWPPP, performing inspections of the site, and making changes as necessary to meet the requirements of the NPDES Phase II regulations.

7.1 Permit Requirements

The Department will develop, implement, and enforce a program to reduce pollutants in any stormwater runoff to the small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Pollutant reduction in stormwater discharges from construction activity disturbing less than one acre shall be included in the program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. If DEQ waives requirements for stormwater discharges associated with small construction from a specific site(s), the Department is not required to enforce the program to reduce pollutant discharges from such site(s). The program shall include the development and implementation of, at a minimum:

- An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under State or local law.
 - The ordinance or other regulatory mechanism shall be at least as stringent and not conflicting with the criteria set forth in the current, at time of issuance of this permit, DEQ NPDES General Stormwater Permit for Construction Activities applicable for the permit area. This would include the statewide NPDES General Stormwater Permit for Construction Activities. If initially coverage was under a previous version of this permit then the ordinance or other regulatory mechanism, if needed, shall be revised within two years of coverage under this general permit was granted;
- Requirement to implement appropriate erosion and sediment control BMPs;
- Requirement to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse water quality impacts;

- Procedures for site plan review which incorporate consideration of potential water quality impacts;
- Procedures for receipt and consideration of information submitted by the public;
- Procedures for site inspection and enforcement of control measures.

7.2 Rationale Statement

The Department will continue established procedures to ensure compliance with the requirements of this MCM and the NPDES Construction Stormwater Permit. In most cases, this process begins with the project designer who develops a SWPPP as part of the design process. Designers use information from many sources to ensure the plan is effective in preventing the discharge of sediment to waters of the State while the project is underway. Typically, the SWPPPs are reviewed at several levels to assure adequacy. They are prepared by engineers, reviewed and certified by a supervisory engineer, and further reviewed by the Resident Engineer or District Maintenance Engineer before work begins.

After the project design and SWPPP are complete, the Department submits a Notice of Intent to DEQ to obtain NPDES coverage for large jobs. Small jobs proceed under the automatic coverage provision of the Construction Stormwater Permit.

Most construction projects undertaken by the Department are done by contractors who install and maintain BMPs and implement construction waste control in accordance with the SWPPP. Once the job is contracted, it is under the oversight of a Resident Engineer with on-site inspectors to ensure the contractor complies with the SWPPP requirements for installation and maintenance of BMPs and the control of construction waste. The Department inspectors complete a formal inspection of each job with NPDES Construction Stormwater Permit coverage at least every seven days from the commencement of construction until the Notice of Termination is approved by DEQ. The results of the inspections are documented on a Department inspection form and a copy is given to the contractor to use in correcting deficiencies. If the district personnel find the SWPPP is not working as designed, they have the authority and responsibility to initiate changes to correct any deficiencies. If a contractor is not following the requirements of the SWPPP or NPDES Construction Stormwater permit, the Department has sanctions available to correct the problem including stop work orders, monetary penalties, and temporary cessation of other project work until the site is in compliance.

On projects undertaken by Department forces, the requirements of the NPDES Permit are the responsibility of District personnel who develop a SWPPP, submit an NOI when required, install BMPs, perform inspections, and oversee all phases of the job until it is completed.

The Department relies on a well-trained work force to implement the construction stormwater program. In 2009, the Department completed an agreement with the

University of Arkansas Center for Training Transportation Professionals (CTTP) to conduct erosion and sediment control training and certification for Department construction personnel and contractors. This training began in 2010 with a goal of training and certifying all persons authorized to perform construction site stormwater inspections on Department projects every five years. The training is also required of contractors disturbing greater than 1 acre of soil. This training is supplemented by annual training provided by personnel from the Department's Natural Resources Section.

Since Department construction projects are distributed across the State, a means of identifying common problems, innovative BMP solutions, and communicating these to the construction community is desirable. To help fulfill this goal, the Natural Resources Section members will visit at least ten construction or maintenance projects during each Permit year and prepare a short report of the onsite observations.

The general public may become involved in the construction process by submitting comments, questions, or concerns on any Department job in progress through the public hotline, app, or the Department's website.

The goal of this MCM is to improve the Department's compliance with the NPDES Permit and success is determined by a low number of citizen or regulatory agency complaints, as well as few problems found during staff assistance visits to job sites. For those BMPs with quantifiable goals, success is measured by actual versus planned accomplishments for the BMP.

7.3 Construction Site Stormwater Runoff Control-Implementation Plan

The Department will implement the following BMPs to achieve compliance with the requirements of MCM Four, Construction Site Stormwater Runoff Control.

7.3.1 Training and Certification Program for Department Personnel (BMP 4.1)

<i>BMP Contact</i>	Natural Resources Section
<i>Target Audience</i>	District construction personnel
<i>Target Pollution Sources</i>	Sediment, construction waste
<i>Description</i>	The Department will provide training for all construction personnel whose daily duties could impact stormwater. The training will be done in-house by the Natural Resources Section or through the University of Arkansas.
<i>Measurable Goals</i>	Provide annual training to eligible construction employees whose daily duties could impact stormwater during the term of the Permit.

7.3.2 New Standard Features and Methods for Construction BMPs (BMP 4.2)

<i>BMP Contact</i>	Natural Resources Section-Research State Construction Engineer-Testing NPDES Standing Committee and Specifications Committee-Review for possible adoption
<i>Target Audience</i>	N/A
<i>Target Pollution Sources</i>	Sediment
<i>Description</i>	Investigate new erosion and sediment control BMPs as relevant to ARDOT and adopt new items through inclusion in the Standard Specifications (ARDOT 2014, or successor) or through a Special Provision, as appropriate.
<i>Measurable Goals</i>	Report findings of possible new BMPs to appropriate Department entities throughout the term of the Permit.

7.3.3 Erosion and Sediment Control Design and Construction Manual (BMP 4.3)

<i>BMP Contact</i>	State Construction Engineer/Natural Resources Section
<i>Target Audience</i>	Designated district construction and maintenance personnel
<i>Target Pollution Sources</i>	Sediment, construction waste
<i>Description</i>	Maintain an Erosion and Sediment Control Design and Construction Manual.
<i>Measurable Goals</i>	A manual will be maintained on all construction and maintenance jobs which require coverage under the Construction Stormwater General Permit. A copy will also be maintained on the Department's website to be used by other personnel, as necessary.

7.3.4 Means for Public Comment on ARDOT Construction Activities (BMP 4.4)

<i>BMP Contact</i>	Natural Resources Section-Tracking and validation State Construction Engineer-Resolution
<i>Target Audience</i>	General public
<i>Target Pollution Sources</i>	Sediment, construction waste

Description Maintain and publicize a hotline number and website reporting form, so citizens can express concerns or ask questions about Department construction or maintenance projects.

Measurable Goals All communications will be documented and responded to within three business days of receipt. Valid concerns will be relayed to the Construction Division for resolution.

7.3.5 Contractor Erosion and Sediment Control Training (BMP 4.5)

BMP Contact State Construction Engineer

Target Audience Department contractors

Target Pollution Sources Sediment, construction waste

Description Require CTPP Erosion and Sediment Control Training for prime contractors on jobs disturbing a minimum on one acre.

Measurable Goals Erosion and sediment control training course will be offered to contractors through advertisement on the Department website and required of prime contractors based on project size. This will be verified following contract awarding.

7.3.6 Staff Assistance Visits to ARDOT Projects (BMP 4.6)

BMP Contact Natural Resources Section

Target Audience N/A

Target Pollution Sources Sediment, construction waste

Description Members of the Department's Natural Resources Staff will visit ten projects during each year of the Permit to assist District personnel in overall NPDES program compliance. Special emphasis will be given to projects that discharge to turbidity impaired waters by and to special category waters identified by DEQ.

Measurable Goals Visit at least ten projects during each year of the Permit, with a report of results to appropriate managers. Elevate reoccurring problems to the Districts and the Construction Division as needed.

7.4 Construction Site Stormwater Management Summary and Schedule

Table 7-1 provides a summary of measurable goals of each BMP for MCM Four.

CONSTRUCTION SITE STORMWATER MANAGEMENT BMPs AND MEASURABLE GOALS TABLE 7-1	
BMP Number/Name	Measurable Goal
4.1 Training Program for Construction Personnel	Provide annual training to eligible construction employees whose daily duties could impact stormwater during the term of the Permit.
4.2 New Standard Features and Methods for Construction BMPs	Report findings of possible new BMPs to appropriate Department entities throughout the term of the Permit.
4.3 Erosion and Sediment Control Manual	A manual will be maintained on all construction and maintenance jobs which require coverage under the Construction Stormwater General Permit. A copy will also be maintained on the Department's website to be used by other personnel, as necessary.
4.4 Means for Public Comment on ARDOT Construction Activities	All communications will be documented and responded to within three business days of receipt. Valid concerns will be relayed to the Construction Division for resolution.
4.5 Contractor Erosion and Sediment Control Training	Erosion and sediment control training course will be offered to contractors through advertisement on the Department website and required of prime contractors based on project size. This will be verified following contract awarding.
4.6 Staff Assistance Visits to ARDOT Projects	Visit at least ten projects during each year of the Permit, with a report of results to appropriate managers. Elevate reoccurring problems to the Districts and the Construction Division as needed.

8 POST-CONSTRUCTION STORMWATER MANAGEMENT

Post-construction stormwater management is necessary in areas undergoing development or redevelopment because runoff from these areas has been shown to significantly affect receiving waterbodies. Many studies indicate that prior planning and design for the minimization of pollutants in post-construction stormwater discharges is the most cost-effective approach to stormwater quality management.

There are generally two forms of substantial impacts of post-construction runoff. The first is caused by an increase in the type and quantity of pollutants in stormwater runoff. As runoff flows over areas altered by development, it picks up harmful sediment and chemicals such as oil and grease, pesticides, heavy metals, and nutrients (e.g., nitrogen and phosphorus). These pollutants often become suspended in runoff and are carried to receiving waters, such as lakes, ponds, and streams. Once deposited, these pollutants can enter the food chain through small aquatic life, eventually entering the tissues of fish and humans.

The second type of post-construction runoff impact occurs by increasing the quantity of water delivered to the water body during storms. Increased impervious surfaces interrupt the natural cycle of gradual percolation of water through vegetation and soil. Instead, water is collected from paved surfaces and routed to drainage systems where large volumes of runoff quickly flow to the nearest receiving water. The effects of this process include stream bank scouring and downstream flooding, which often lead to a loss of aquatic life and damage to property.

An effective post-construction runoff control program will minimize water quality impacts and attempt to maintain pre-development runoff conditions.

8.1 Permit Requirements

The Department shall develop, implement, and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre. This requirement also includes projects less than one acre that are part of a larger common plan of development or sale that discharge into a small MS4. The program shall ensure controls are placed to prevent or minimize water quality impacts.

The Department shall develop and implement strategies which include a combination of structural and/or nonstructural BMPs appropriate for the community.

The Department shall use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under State or local law. The ordinance or other regulatory mechanism shall be at least as stringent as the criteria set forth in the current, at time of issuance of this permit, DEQ NPDES General Stormwater Permit for Construction Activities applicable for a permitted area. This would include the statewide NPDES General Stormwater Permit for

Construction Activities. Of specific note, is that a goal of at least 80% removal of total suspended solids from these flows which exceed predevelopment levels should be used in designing and installing stormwater management controls (where practicable). If initial coverage was under a previous version of this permit then the ordinance or other regulatory mechanism, if needed, shall be revised within two years of when coverage under this general permit was granted.

The Department shall ensure adequate long-term operation and maintenance of BMPs.

8.2 Rationale Statement

The Department will rely on a combination of non-structural and structural BMPs to implement this MCM.

Non-structural BMPs used by the Department include: establishment of permanent vegetation on construction sites; contract special provisions to preserve existing vegetation; maintaining vegetated buffer zones along streams when possible; protection of wetlands during construction; personnel training for post-construction BMP maintenance; and source control measures such as the implementation of maintenance facility pollution prevention plans, litter collection and street sweeping which are implemented through the Pollution Prevention/Good Housekeeping MCM.

The Department uses numerous structural BMPs, which are selected by design engineers to meet the requirements outlined in the Construction Stormwater Permit. All plans are reviewed and approved by engineering supervisors before the project is let to contract and by Resident Engineers before, during, and after construction. The primary structural BMPs used and their target pollutants are shown below:

BMP	Target Pollutants
Concrete spillways/grouted riprap/other outlet structures	Erosion control, debris
Detention/Retention ponds	Sediment
Grassed swales and channels	Sediment, litter, oil, heavy metals
Vegetated filter strips	Sediment, litter, oil, heavy metals
Rip rapped slopes and channels	Sediment
Inlet grating	Litter
Hard Surface ditches/channels/drains	Sediment
Velocity dissipaters	Erosion control, sediment

After the project is complete, Resident Engineers ensure the structural measures have been built in good-engineering practice. Once this is confirmed and the project is stabilized, the Notice of Termination (NOT) is submitted and the long term operation and

maintenance of the BMPs become the responsibility of the District Maintenance Engineers. To accomplish this, an Area Maintenance Supervisor assigned to each county regularly travels the State roadways in their area to identify items needing maintenance. Repairs are normally done by District maintenance personnel.

The overall success of this MCM will be determined by few problems on Department roadways or facilities, which can be attributed to inadequate or improperly maintained permanent stormwater BMPs. A formal assessment will be developed by the Natural Resources Section during Permit Year 5 and presented to the NPDES Standing Committee for their action. For those BMPs with quantifiable goals, success will be measured by actual verses planned accomplishments for the BMP.

8.3 Post-Construction Stormwater Management in New Development and Redevelopment-Implementation Plan

The Department will implement the following BMPs to achieve compliance with the requirements of MCM Five, Post-Construction Stormwater Management in New Development and Redevelopment.

8.3.1 Post-Construction Features and Methods (BMP 5.1)

<i>BMP Contact</i>	Natural Resources Section-Research State Construction Engineer-Testing
<i>Target Audience</i>	N/A
<i>Target Pollution Sources</i>	Sediment
<i>Description</i>	The Department will continue to research post-construction BMPs adopted by other DOTs and government entities for effectiveness and feasibility, and use them as a basis for developing new or updated BMPs.
<i>Measurable Goals</i>	Present possible BMP candidates to the NPDES Standing Committee for consideration and possible testing on Department projects.

8.3.2 BMP Inspection and Maintenance (BMP 5.2)

<i>BMP Contact</i>	District Maintenance Engineer
<i>Target Audience</i>	N/A
<i>Target Pollution Sources</i>	Sediment, floatables

<i>Description</i>	Identify routine BMP maintenance needs for post-construction BMPs during regular surveys of the roadways by District maintenance personnel.
<i>Measurable Goals</i>	Perform follow-up maintenance to keep BMPs in good working order.

8.3.3 Employee Training (BMP 5.3)

<i>BMP Contact</i>	Natural Resources Section-Course Development District Maintenance Engineer-Training
<i>Target Audience</i>	Area Maintenance Supervisors
<i>Target Pollution Sources</i>	Sediment, floatables
<i>Description</i>	The Department will provide training on the inspection and maintenance of the MS4 drainage system.
<i>Measurable Goals</i>	Provide training for Area Maintenance Supervisors on inspection and documentation of the MS4 drainage system.

8.3.4 Review Plans for New Facilities (BMP 5.4)

<i>BMP Contact</i>	Natural Resources Section/Facilities Management
<i>Target Audience</i>	N/A
<i>Target Pollution Sources</i>	Sediment, petroleum products, and other chemicals
<i>Description</i>	All plans for new facilities will be reviewed early in the design process for inclusion of permanent BMPs.
<i>Measurable Goals</i>	Review all new facility plans and recommend the incorporation of permanent BMPs when warranted.

8.3.5 Department Facility Permanent BMP Survey (BMP 5.5)

<i>BMP Contact</i>	Natural Resources Section
<i>Target Audience</i>	N/A
<i>Target Pollution Sources</i>	Sediment, petroleum products, other chemicals.

<i>Description</i>	Members of the Natural Resources staff will visit 50 Department maintenance facilities during the term of the Permit, meet with District maintenance personnel, and conduct a joint survey of the facilities for possible retrofit of permanent BMPs.
<i>Measurable Goals</i>	Ten maintenance facilities to be surveyed during each Permit year with recommendations provided to the Districts for their consideration.

8.3.6 Post Construction BMP Review (BMP 5.6)

<i>BMP Contact</i>	Natural Resources Section
<i>Target Audience</i>	N/A
<i>Target Pollution Sources</i>	Sediment, floatables
<i>Description</i>	The Department will conduct a review of existing post-construction BMPs on two completed projects during each permit year to determine if they are still effective in reducing the discharge of pollutants to the maximum extent practicable. The research used in BMP 5.1 will be used as a basis for recommending new or revised BMPs to better fulfill the requirements where necessary. At the end of Permit Year 5, an assessment of post-construction BMP effectiveness will be provided to the NPDES Standing Committee.
<i>Measurable Goals</i>	A field survey of post-construction BMPs to be conducted on two completed projects during each permit year with an overall assessment prepared and presented to the NPDES Standing Committee in Permit Year 5.

8.4 Post-Construction Stormwater Management in New Development and Redevelopment Summary and Schedule

Table 8-1 provides a summary of measurable goals of each BMP for MCM Five.

POST-CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT BMPS AND MEASURABLE GOALS TABLE 8-1	
BMP Number/Name	Measurable Goal
5.1 Research and Implement New Post-Construction BMPS	Present possible BMP candidates to the NPDES Standing Committee for consideration and possible testing on Department projects.
5.2 BMP Inspection and Maintenance	Perform follow-up maintenance to keep BMPs in good working order.
5.3 Employee Training	Provide training for Area Maintenance Supervisors on inspection and documentation of the MS4 drainage system.
5.4 Review Plans for New Facilities	Review all new facility plans and recommend the incorporation of permanent BMPs when warranted.
5.5 Dept. Facility Permanent BMP Survey	Ten maintenance facilities to be surveyed during each Permit year with recommendations provided to the Districts for their consideration.
5.6 Post-Construction BMP Review	A field survey of post-construction BMPs to be conducted on two completed projects during each permit year with an overall assessment prepared and presented to the NPDES Standing Committee in Permit Year 5.

9 POLLUTION PREVENTION / GOOD HOUSEKEEPING

The Pollution Prevention/Good Housekeeping MCM is a key element of the small MS4 stormwater management program. This MCM requires the Department to examine current practices and alter actions to help ensure a reduction in the discharge of pollutants from Department roadways, stormwater drainage systems, and vehicle maintenance and storage areas. This MCM will also address the pollution that results from actions, such as environmentally damaging land development and flood management practices.

Even though this MCM is primarily intended to accomplish the goal of improving or protecting the quality of receiving water, it can also result in cost savings for the Department. Well-timed maintenance of drainage systems can help avoid costly repairs from age or neglect.

9.1 Permit Requirements

The Department will develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations;

Using training materials available from EPA, DEQ, other organizations or developed in-house, the program shall include employee training to prevent and reduce stormwater pollution from activities such as open space maintenance, fleet, and building maintenance, new construction and land disturbances, and stormwater system maintenance;

The Department shall include a list of industrial facilities owned or operated by the MS4 that are subject to DEQ's Industrial Stormwater General Permit or individual NPDES permits for discharges of stormwater associated with industrial activity that ultimately discharge to the MS4. Include the DEQ permit number or a copy of the Industrial NOI form for each facility. For the municipal facilities that conduct activities described in 40 CFR 122.26(b)(14) that are not required to obtain Industrial Stormwater General Permit coverage a SWPPP shall be developed and implemented within twelve months of coverage being granted under this permit. The SWPPP shall conform to the requirements of DEQ's Industrial Stormwater General Permit in effect at the time coverage under this permit is granted.

9.2 Rationale Statement

The BMPs selected for this MCM include a mix of remediation, training, inspections, and written plans, all intended to complement each other with the goal of reducing the amount of stormwater pollution from roadways and maintenance facilities.

The Department emphasizes litter reduction through the Litter Hotline, educational handouts, and anti-littering signs on State roadways under MCMs 1 and 2. Despite these efforts, littering still occurs. The Department will reduce the potential for this material to

enter State waterways through litter collection by Department forces, contractors, and Adopt-A-Highway volunteers. The goal is to collect 25,000 cubic yards of debris from State roads during each year of the Permit. In addition to the litter collection program, the Department practices street sweeping on an as-needed basis on State roadways within small designated MS4 areas throughout the State. The material collected from all sources is properly disposed of.

The Department Natural Resources Section delivers annual training in several areas to Area Maintenance Supervisors and other key maintenance employees. The program includes an internally developed *Power Point* presentation on the requirements of the facility pollution prevention plans (PPPs), spill prevention control and countermeasures, the NPDES Pesticide General Permit, and illicit discharge detection and reporting, which is tracked under MCM 3. In addition, several commercial DVDs covering topics relating to this MCM have been purchased and are used as appropriate during training sessions.

Facility PPPs have been developed and distributed to all Department maintenance facilities (Appendix A). These plans serve as the master document for each facility to implement the requirements of the Permit in as the following areas: maintenance activities, material storage and handling, illicit discharge prevention, and spill prevention/countermeasures. Throughout the Permit term, the Natural Resources Section will conduct a staff assistance visit to 50 of the Department's maintenance facilities. During the visits, the staff will review implementation of the PPPs, required paperwork, and walk-through the facility with the supervisors. In addition, staff will document BMP implementation with a focus on areas for possible improvement and to record innovative ideas which could be used system-wide.

An important part of the program for this MCM is a periodic survey of the Department's MS4 drainage system within the Regulated Small MS4 areas. This informal practice is done quarterly by the Area Maintenance Supervisor, who regularly drive the State roads within their county to find portions of the MS4 drainage system needing maintenance.

The Department personnel who apply herbicides on the right of way receive training through the University of Arkansas Cooperative Extension Service and are certified by the Arkansas State Plant Board every three years. This is supplemented by annual NPDES Pesticide Permit training provided by the Department's Natural Resources Section. Fertilizer application is normally limited to construction activities and is done in accordance with the application rates in the Department's Standard Specifications for Highway Construction.

The success of this MCM will be determined by few if any reportable spills at Department facilities, successful implementation of facility PPPs, and satisfactory results from staff assistance to the facilities. Although meeting the litter collection goal is important, over time the hope would be to greatly reduce the amount of litter to be collected through public education and involvement. For those BMPs with quantifiable goals, success will be measured by actual versus planned accomplishments for the BMP.

9.3 Pollution Prevention/Good Housekeeping for Municipal Operations-Implementation Plan

The Department will implement the following BMPs to achieve compliance with the requirements of MCM Six, Pollution Prevention/Good Housekeeping for Municipal Operations.

9.3.1 Collect and Dispose of Litter from ARDOT Right of way (BMP 6.1)

<i>BMP Contact</i>	District Maintenance Engineer
<i>Target Audience</i>	N/A
<i>Target Pollution Sources</i>	Litter
<i>Description</i>	Using Department resources and volunteers, the Department will collect and dispose of litter from State roadways. This will reduce the amount of pollutants entering the State's waters and help to keep the Department's structural stormwater systems in good working order. A secondary but important benefit is to keep the roadsides attractive for motorists.
<i>Measurable Goals</i>	Collect and properly dispose of 25,000 cubic yards of litter during each year of the Permit.

9.3.2 Street Sweeping (BMP 6.2)

<i>BMP Contact</i>	District Maintenance Engineer
<i>Target Audience</i>	N/A
<i>Target Pollution Sources</i>	Debris, floatables, organic material
<i>Description</i>	Continue street sweeping within the designated small MS4 areas as required. Sweeping produces a water quality benefit by reducing the quantity of materials that can be washed into the stormwater drainage system. The frequency of sweeping will depend on traffic, weather, and available resources. Collected debris will be disposed of in accordance with solid waste disposal regulations.
<i>Measurable Goals</i>	Sweep streets within designated MS4 areas as required.

9.3.3 Drainage System Surveys (BMP 6.3)

<i>BMP Contact</i>	District Maintenance Engineer
<i>Target Audience</i>	N/A
<i>Target Pollution Sources</i>	Sediment, debris, litter
<i>Description</i>	Department maintenance personnel will survey the storm drainage system within small MS4 areas once each quarter and assess the need for repair, cleaning or clearing. This will be done as part of the Area Maintenance Supervisor's normal survey of the highways in their area of responsibility.
<i>Measurable Goals</i>	Quarterly check of the drainage system to continue within small designated MS4 areas.

9.3.4 Pollution Prevention Plans (PPPs) Implemented for Department Facilities Statewide (BMP 6.4)

<i>BMP Contact</i>	Natural Resources Section-Development District Maintenance Engineer-Implementation
<i>Target Audience</i>	N/A
<i>Target Pollution Sources</i>	Chemicals, sediment, petroleum products
<i>Description</i>	PPPs fully implemented and updated as necessary for all eligible Department maintenance facilities throughout the state.
<i>Measurable Goals</i>	Implementation of PPPs will continue for all Department maintenance facilities. The plans will be updated as necessary.

9.3.5 Staff Assistance Visits to Department Maintenance Facilities (BMP 6.5)

<i>BMP Contact</i>	Natural Resources Section
<i>Target Audience</i>	Area Maintenance Supervisors
<i>Target Pollution Sources</i>	Chemicals, sediment, oil and petroleum products.
<i>Description</i>	Personnel from the Natural Resources Section will visit 50 maintenance facilities to provide assistance on PPP

compliance and to help area maintenance personnel with any specific problems.

Measurable Goals Visit 10 maintenance facilities each year during the term of the Permit.

9.3.6 Maintenance Employee Training (BMP 6.6)

BMP Contact Natural Resources Section-Development
District Maintenance Engineer-Training

Target Audience District Maintenance Personnel

Target Pollution Sources Chemicals, sediment, petroleum products, floatables

Description Employee training is an important factor in the reduction of stormwater pollution from Department facilities. Annual training will be provided to maintenance employees emphasizing topics, such as good housekeeping practices, spill prevention and control, waste storage and disposal, and proper documentation. The training will also include illicit discharge training, which will be tracked under BMP 3.3 in the Illicit Discharge Detection and Elimination MCM. Additionally, Illicit Discharge Education Handouts will be provided to attendees and tracked as part of BMP 1.1, Stormwater Educational Material, in the Public Education and Outreach MCM.

Measurable Goals Provide annual training to at least 90% of eligible maintenance employees.

9.3.7 Vegetation Management (BMP 6.7)

BMP Contact State Maintenance Engineer

Target Audience District maintenance personnel

Target Pollution Sources Herbicides, fertilizers

Description Department vegetation management practices on its roadways include the use of herbicides in areas where mowing is physically impossible, impractical, or dangerous and fertilizer application on new construction or maintenance areas to help establish vegetation. The Department strives to limit chemical application because over-application is not economical and is harmful to the

environment. Personnel whose job duties include herbicide application will receive training through the U. of A. Cooperative Extension Service. Recertification training is required every three years. Fertilizer is applied on the right of way according to the rates established in the ARDOT Standard Specifications for Highway Construction. During annual training, personnel will receive refresher training to help them comply with state requirements for the NPDES Pesticide General Permit.

Measurable Goals

Require Cooperative Extension Service training and certification for herbicide applicators every three years.

Provide annual refresher training for maintenance employees on the requirements of the NPDES Pesticide General Permit.

9.3.8 Litter Tracking System (BMP 6.8)

BMP Contact

State Maintenance Engineer

Target Audience

N/A

Target Pollution Sources

Litter

Description

The Department will maintain a record of litter collected.

Measurable Goals

Maintain a record of litter collected on the Department right of way by Department forces, contractors, and volunteers statewide.

9.4 Pollution Prevention/Good Housekeeping for Municipal Operations Summary and Schedule

Table 9-1 provides a summary of measurable goals of each BMP for MCM Six.

POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS BMPS AND MEASURABLE GOALS TABLE 9-1	
BMP Number/Name	Measurable Goal
6.1 Collect and Dispose of Litter from ARDOT Right of way	Collect and properly dispose of 25,000 cubic yards of litter during each year of the Permit.
6.2 Street Sweeping	Sweep streets within designated MS4 areas as required.
6.3 Drainage System Surveys	Quarterly check of the drainage system to continue within small designated MS4 areas.
6.4 Pollution Prevention Plans for Department Facilities	Implementation of PPPs will continue for all Department maintenance facilities. The plans will be updated as necessary.
6.5 Staff Assistance Visits to Maintenance Facilities	Visit 10 maintenance facilities each year during the term of the Permit.
6.6 Maintenance Employee Training	Provide annual training to at least 90% of eligible maintenance employees.
6.7 Vegetation Management	Require Cooperative Extension Service training and certification for herbicide applicators every three years. Provide annual refresher training for maintenance employees on the requirements of the NPDES Pesticide General Permit.
6.8 Litter Tracking System	Maintain a record of litter collected on the Department right of way by Department forces, contractors, and volunteers statewide.

10 MONITORING AND REPORTING

10.1 Compliance Monitoring and Evaluation

The Department's overall strategy for maintaining compliance with the Permit and the stormwater management program is a process of continuous improvement and refinement. The compliance monitoring and evaluation program will serve as a quality control mechanism to help determine the effectiveness of the Department's SWMP. It will be an iterative process; a continuous loop of gathering information, from evaluating BMPs, to learning and incorporating best practices statewide. The goal is steady improvement of the Program by implementing changes throughout the Permit term.

As part of its stormwater management program, the Department will regularly review its activities, inspect its facilities, train and guide its personnel, and assess the effectiveness of stormwater BMPs to better utilize the resources available to implement stormwater management activities. The objective will be to direct available resources to support those stormwater management practices that have the greatest likelihood of being effective.

The Department will conduct a review of the stormwater management program annually. This review will be done in conjunction with the preparation of the annual report so any proposed modifications to the SWMP can be included in the report for DEQ review and approval as required by the Permit.

10.2 Reporting

The Permit requires the Department to submit annual reports to DEQ during the life of the Permit. The first report will be due March 31, 2025, covering activities during the period of January 1, 2024, through December 31, 2024. Subsequent reports will be due on March 31 of each year for the Permit term (and continuing into any administrative continuance of the Permit, should it not be reissued prior to expiration). Reports will be available on the Department website. The report will be used by the Department and DEQ to evaluate program compliance and will include all reporting requirements outlined in the current permit.

Appendix A: Department Statewide Facility List, by District

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Tables A-1 through A-10 list ARDOT owned and/or maintained facilities by District. Shaded cells identify facilities that lie within a regulated small MS4 area. A single asterisk identifies Department facilities located within the City of Little Rock MS4 area and covered under NPDES Permit ARS000002. Double asterisks identify facilities that, because of their function, do not require the preparation of a facility SWPPP.

DISTRICT ONE FACILITIES		
Table A-1		
FACILITY NAME	CITY	COUNTY
**AHP Multi-purpose Facility	West Memphis	Crittenden
Crittenden County #1 Area Headquarters & RE Office #14	West Memphis	Crittenden
Crittenden County #2 Area Headquarters	Lehi	Crittenden
Cross County Area Headquarters and RE Office #13	Wynne	Cross
District 1 Headquarters	Wynne	Cross
**Forrest City Rest Area-Eastbound	Palestine	St. Francis
**Forrest City Rest Area-Westbound	Forrest City	St. Francis
** Helena Welcome Center	Helena	Phillips
Lee County Area Headquarters	Marianna	Lee
**Lehi Weigh Station (I-40 East)	Lehi	Crittenden
** Marion Weigh Station (I-55 Southbound)	Marion	Crittenden
Monroe County Area Headquarters	Brinkley	Monroe
Phillips County Area Headquarters	Walnut Corner	Phillips
** Radio Tower-Storm Creek	West Helena	Phillips
** Radio Tower-Wynne	Wynne	Cross
**RE Office #11	West Helena	Phillips
St. Francis County Area Headquarters	Forrest City	St. Francis
** West Memphis Welcome Center	West Memphis	Crittenden
** Riverside Weigh Station (I-40 Westbound)	West Memphis	Crittenden
** Bridgeport Weigh Station (I-55 Northbound)	West Memphis	Crittenden
Woodruff County Area Headquarters	McCrary	Woodruff
**I-40 & I-55 Park & Ride Lot	West Memphis	Crittenden

DISTRICT TWO FACILITIES		
Table A-2		
FACILITY NAME	CITY	COUNTY
Arkansas County #1 Area Headquarters	Stuttgart	Arkansas
Arkansas County #2 Area Headquarters	DeWitt	Arkansas
Ashley County Area Headquarters	Hamburg	Ashley
Chicot County Area Headquarters	Lake Village	Chicot
** Dermott Rest Area (Closed)	Dermott	Chicot
Desha County Area Headquarters and RE Office #24	McGehee	Desha
District 2 Headquarters and RE Office #23	Pine Bluff	Jefferson
Drew County Area Headquarters and RE Office #21	Monticello	Drew
Grant County Area Headquarters	Sheridan	Grant
Jefferson County Area Headquarters	Pine Bluff	Jefferson
** Lake Village Welcome Center	Lake Village	Chicot
Lincoln County Area Headquarters	Star City	Lincoln
** Radio Tower-Fountain Hill	Fountain Hill	Ashley
** Radio Tower-Preston Ferry	Preston Ferry	Arkansas
** Radio Tower-Redfield	Redfield	Jefferson
** Radio Tower-Star City/Glendale	Star City	Lincoln
** Jct. I-530 & St. Hwy. 270 (Exit 34) Park & Ride Lot	White Hall	Jefferson

DISTRICT THREE FACILITIES		
Table A-3		
FACILITY NAME	CITY	COUNTY
District 3 Headquarters and RE Office #32	Hope	Hempstead
** Glenwood Rest Area	Glenwood	Pike
** Guernsey Weigh Station (I-30 East and Westbound)	Hope	Hempstead
Hempstead County Area Headquarters	Hope	Hempstead
Howard County Area Headquarters and RE Office #31	Nashville	Howard
Lafayette County Area Headquarters	Lewisville	Lafayette
Little River County Area Headquarters	Ashdown	Little River
Miller County Area Headquarters and RE Office #34	Texarkana	Miller
Nevada County Area Headquarters	Prescott	Nevada
Pike County Area Headquarters	Murfreesboro	Pike
** Radio Tower-Hope	Hope	Hempstead
** Radio Tower-Texarkana	Texarkana	Miller
** Red River Welcome Center	Ashdown	Miller
** Red River Weigh Station (Highway 71 North and Southbound)	Ashdown	Little River
Sevier County Area Headquarters	De Queen	Sevier
** Texarkana Welcome Center	Texarkana	Miller

DISTRICT FOUR FACILITIES		
Table A-4		
FACILITY NAME	CITY	COUNTY
** Alma Weigh Station (I-40 East and Westbound)	Alma	Crawford
Crawford County #1 Area Headquarters	Alma	Crawford
Crawford County #2 Area Headquarters	Mountainburg	Crawford
District 4 Headquarters, Sebastian County #2 Area Headquarters, RE #42	Barling	Sebastian
Franklin County Area Headquarters	Ozark	Franklin
Logan County Area Headquarters	Paris	Logan
** Ozark Rest Area (I-40 Eastbound)	Ozark	Franklin
** Ozark Rest Area (I-40 Westbound)	Ozark	Franklin
Polk County Area Headquarters	Mena	Polk
** Radio Tower-Bunyard-Bobby Hopper Tunnel	Winslow	Washington
** Radio Tower-Mt. Magazine	Mt. Magazine State Park	Logan
** Radio Tower-Winslow	Sunset	Washington
** Radio Tower - White Oak (USFS land leased)	Waldron	Scott
Scott County Area Headquarters and RE Office #41	Waldron	Scott
Sebastian County #1 Area Headquarters	Greenwood	Sebastian
** Springdale Weigh Station (I-540 Northbound)	Springdale	Washington
** Springdale Weigh Station (I-540 Southbound)	Springdale	Washington
** Van Buren Welcome Center	Van Buren	Crawford
** Waldron Rest Area	Waldron	Scott
Washington County #1 Area Headquarters	Lincoln	Washington
Washington County #2 Area Headquarters and RE Office #43	Fayetteville	Washington
** Jct. St Hwy 23 & I-40 (Exit 35) Park & Ride Lot	Ozark	Franklin
** South of Jct. I-40 & St Hwy. 219 on 219 (Exit 37) Park & Ride Lot	Ozark	Franklin
** U.S. 71 & Hwy. 10 Spur Park & Ride Lot	Greenwood	Sebastian

DISTRICT FIVE FACILITIES Table A-5		
FACILITY NAME	CITY	COUNTY
Cleburne County Area Headquarters	Heber Springs	Cleburne
District 5 Headquarters, Independence County Area Headquarters, and RE Offices #52 and 53	Batesville	Independence
Fulton County Area Headquarters	Salem	Fulton
Izard County Area Headquarters	Melbourne	Izard
Jackson County Area Headquarters	Newport	Jackson
** Radio Tower-Almond	Almond	Independence
** Radio Tower-Ash Flat	Ash Flat	Fulton
** Radio Tower-Bradford	Bradford	Jackson
** Radio Tower – Joy (leased from White Co. 911)	Joy	White
** Salado Creek Rest Area	Pleasant Plains	Independence
Sharp County Area Headquarters	Hardy	Sharp
Stone County Area Headquarters	Mountain View	Stone
White County #1 Area Headquarters and RE Office #55	Searcy	White
White County #2 Area Headquarters	Bald Knob	White
**Jct. St Hwy. 9 and St Hwy. 56 Park & Ride Lot	Brockwell	Izard

DISTRICT SIX FACILITIES		
Table A-6		
FACILITY NAME	CITY	COUNTY
*Central Complex, District 6 Headquarters, Pulaski County #3 Area Headquarters, & RE Office # 65 Headquarters	Little Rock	Pulaski
*Central Shop, Maintenance Headquarters, and Materials Lab Annex	Little Rock	Pulaski
Garland County Area Headquarters and RE Office #64	Hot Springs	Garland
Hot Springs County Area Headquarters	Malvern	Hot
Lonoke County Area Headquarters	Lonoke	Lonoke
** Lonsdale Rest Area	Lonsdale	Garland
Prairie County Area Headquarters	Hazen	Prairie
Pulaski County #1 Area Headquarters and RE Office #61	North Little Rock	Pulaski
Pulaski County #2 Area Headquarters and RE Office #62	Little Rock	Pulaski
** Radio Tower-Ouachita National Forest		Garland
** Radio Tower-Shinall (KARK & KTHV TV)	Little Rock	Pulaski
Saline County Area Headquarters	Benton	Pulaski
** Social Hill Rest Area	Social Hill	Hot Spring
** White River Rest Area	DeValls Bluff	Prairie
**U.S. 67 & St. Hwy 89 (Exit 19) Park & Ride Lot	Cabot	Lonoke
**I-30 & Mabelvale West (Exit 128) Park & Ride Lot	Little Rock	Pulaski
**I-430 & I-630 Park & Ride Lot	Little Rock	Pulaski
**I-630 & University Street Park & Ride Lot	Little Rock	Pulaski
**I-530 & St. Hwy 338 (Exit 3) Park & Ride Lot	Little Rock	Pulaski
**I-40 & Crystal Hill Rd. Park & Ride Lot	North Little Rock	Pulaski
**I-40 & St Hwy. 161 Park & Ride Lot	North Little Rock	Pulaski
**I-30 & St. Hwy 183 (Exit 123) Park & Ride Lot	Bryant	Saline
**I-30 & Alcoa Rd. Park & Ride Lot	Benton	Saline

DISTRICT SEVEN FACILITIES		
Table A-7		
FACILITY NAME	CITY	COUNTY
Bradley County Area Headquarters	Warren	Bradley
** Buena Vista Rest Area	Buena Vista	Ouachita
Calhoun County Area Headquarters	Hampton	Calhoun
Clark County Area Headquarters and RE Sub-Office #73	Arkadelphia	Clark
Cleveland County Area Headquarters	Rison	Cleveland
Columbia County Area Headquarters	Magnolia	Columbia
Dallas County Area Headquarters	Fordyce	Dallas
District 7 Headquarters and RE Office #74	Camden	Ouachita
** El Dorado Welcome Center	El Dorado	Union
**Gurdon Rest Area (I-30 Eastbound)	Gurdon	Clark
**Gurdon Rest Area (I-30 Westbound)	Gurdon	Clark
Ouachita County Area Headquarters	Camden	Ouachita
** Radio Tower-Banks	Banks	Bradley
** Radio Tower-Camden	Camden	Ouachita
** Radio Tower-El Dorado	El Dorado	Union
** Radio Tower-Okolona	Okolona	Clark
** Radio Tower-Fordyce	Ramsey	Dallas
** Radio Tower-Waldo/Mars Hill	Waldo	Columbia
**RE Office #73	Camden	Ouachita
** Rison Rest Area	Rison	Cleveland
Union County Area Headquarters and RE Office #76	El Dorado	Union

DISTRICT EIGHT FACILITIES		
Table A-8		
FACILITY NAME	CITY	COUNTY
** Big Piney Rest Area (I-40 Eastbound)	Russellville	Johnson
** Big Piney Rest Area (I-40 Westbound)	Russellville	Pope
Conway County Area Headquarters	Morrilton	Conway
District 8 Headquarters and RE Office #86	Russellville	Pope
Faulkner County Area Headquarters and RE Office #84	Conway	Faulkner
Johnson County Area Headquarters and RE Office #82	Clarksville	Johnson
Montgomery County Area Headquarters	Pencil Bluff	Montgomery
Perry County Area Headquarters	Perryville	Perry
Pope County Area Headquarters	Russellville	Pope
** Radio Tower-Mt. Nebo	Mt. Nebo State Park	Yell
** Radio Tower-Peterman	Hector	Pope
Van Buren County Area Headquarters	Clinton	Van Buren
Yell County Area Headquarters	Danville	Yell
**I-40 & St Hwy. 92 in Plummerville (Exit 112) Park & Ride Lot	Plummerville	Conway
**I-40 & St Hwy. 89 in Mayflower (Exit 135) Park & Ride Lot	Mayflower	Faulkner
**I-40 & St Hwy 60 (Exit 129) Park & Ride Lot	Conway	Faulkner

DISTRICT NINE FACILITIES		
Table A-9		
FACILITY NAME	CITY	COUNTY
Baxter County Area Headquarters	Mountain Home	Baxter
** Bella Vista Welcome Center	Bella Vista	Benton
Benton County #1 Area Headquarters	Garfield	Benton
Benton County #2 Area Headquarters	Gentry	Benton
Boone County Area Headquarters	Harrison	Boone
Carroll County Area Headquarters	Berryville	Carroll
District 9 Headquarters and RE Office #92	Harrison	Boone
** Harrison Welcome Center	Harrison	Boone
Madison County Area Headquarters	Huntsville	Madison
Marion County Area Headquarters and RE Office #95	Yellville	Marion
Newton County Area Headquarters	Jasper	Newton
Peel Ferry Maintenance Building	Peel	Marion
** Radio Tower-Gaither	Gaither	Boone
** Radio Tower-Henderson Ferry	Henderson	Baxter
** Radio Tower-Hindsville	Hindsville	Madison
** Radio Tower-Marshall	Marshall	Searcy
**RE Office #94	Bentonville	Benton
Searcy County Area Headquarters	Marshall	Searcy
** Siloam Springs Welcome Center	Siloam Springs	Benton

DISTRICT TEN FACILITIES**Table A-10**

FACILITY NAME	CITY	COUNTY
** Bardstown Rest Area (I-55 Southbound- Closed)	Bardstown	Mississippi
** Blytheville Welcome Center	Blytheville	Mississippi
Clay County Area Headquarters	Corning	Clay
** Corning Welcome Center	Corning	Clay
Craighead County Area Headquarters and RE Office #06	Jonesboro	Craighead
District 10 Headquarters and RE Office #04	Paragould	Greene
Greene County Area Headquarters	Paragould	Greene
** Hilton Rest Area (I-55 Northbound- Closed)	Osceola	Mississippi
** Imboden/Black Rock Rest Area	Black Rock	Lawrence
Lawrence County Area Headquarters	Walnut Ridge	Lawrence
Mississippi County #2 Area Headquarters	Osceola	Mississippi
Poinsett County Area Headquarters	Marked Tree	Poinsett
** Radio Tower-Harrisburg	Harrisburg	Poinsett
** Radio Tower-Paragould	Paragould	Greene
** Radio Tower-Osceola	Osceola	Mississippi
** Radio Tower-Ravenden	Ravenden Springs	Randolph
Randolph County Area Headquarters	Pocahontas	Randolph
**RE Office #05	Osceola	Mississippi

Appendix B: Highway Mileage Within Phase II Regulated Small MS4 Areas

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ARDOT Highway System Miles Within Phase II Regulated Small MS4 Areas (2020 Census) Table B-1				
Regulated MS4 Area	Regulated Interstates (Miles)	Regulated US Routes (Miles)	Regulated State Routes (Miles)	Total Miles
Arkadelphia Urban Area	5.32	3.8	5.93	15.05
Conway Urban Area	37.62	10.97	22.58	71.17
El Dorado Urban Area	0	33.27	4.11	37.38
Fayetteville Urban Area	65.95	65.56	104.54	236.05
Fort Smith Urban Area	63.64	39.38	46.78	149.80
Hot Springs Urban Area	0	62.65	23.80	86.45
Jonesboro Urban Area	32.70	11.33	47.28	91.31
Little Rock Urban Area*	87.59	52.51	107.43	247.53
Mountain Home Urban Area	0	15.94	11.59	27.53
Pea Ridge Urban Area	0	0	5.4	5.4
Pine Bluff Urban Area	21.68	28.23	33.16	83.07
Prairie Grove Urban Area	0	1.32	7.54	8.86
Siloam Springs Urban Area	0	6.47	5.83	12.3
Texarkana Urban Area	38.22	20.23	11.40	69.85
West Memphis Urban Area	32.60	7.86	11.66	52.12
Totals	385.32	359.52	449.03	1193.87

Notes:

The mileage within each MS4 area was computed using US Census Bureau data and arcGIS. For mapping purposes, each side of a divided highway is considered to be a discrete section of roadway.

For sections of highway that are under construction when the MS4 area is mapped, the location is recorded and tracked for mapping when the construction is complete.

*The mileage shown for the Little Rock Urban Area does not include those miles of highway that fall within the City of Little Rock, which are covered under NPDES Permit ARS000002.

Appendix C: Sources of Information Used In ARDOT Stormwater Management

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Sources of Information Used in ARDOT Stormwater Management

ARDOT Erosion and Sediment Control Design and Construction Manual

ARDOT Illicit Discharge Detection and Reporting Protocol

ARDOT Website

Arkansas Pollution Control and Ecology Commission Rule 2; Rule Establishing Water Quality Standards for Surface Waters of the State of Arkansas as revised, effective May 7, 2022.

EPA. 2010. EPA Spill Prevention, Control and Countermeasures (SPCC) Regulation. 40 CFR Part 112. A Facility Owner/Operator's Guide to Oil Pollution Prevention. June 2010. EPA 540-K-09-001.

Individual ARDOT Facility Stormwater Pollution Prevention Plans

NPDES General Construction Stormwater Permit ARR150000, November 2021

NPDES General Permit ARR040000; Regulated Small Municipal Separate Storm Sewer Systems (MS4s) Located within the State of Arkansas, August 2024

NPDES Pesticide General Permit, ARG870000, March 2021

Stormwater Quality Management Program, August 2022, NPDES Permit ARS000002

Standard Specifications for Highway Construction

Statewide Stormwater Management Program, July 2024, NPDES Permit ARR000004

Appendix D: Stormwater Management Program Table of Organization and District Contact Information

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ARDOT Stormwater Management Program Table of Organization Table D-1			
BMP No.	BMP Description	BMP Point of Contact	Contact Number
	MCM 1 Public Education and Outreach		
1.1	Stormwater educational handouts	Natural Resources Section	(501) 569-2553/ 2519
1.2	Stormwater information on ARDOT website	Natural Resources Section	(501) 569-2553/ 2519
1.3	ARDOT public stormwater hotline	Natural Resources Section	(501) 569-2553/ 2519
1.4	Spanish stormwater educational material	Natural Resources Section	(501) 569-2553/ 2519
1.5	Storm drain marking at ARDOT Facilities	Natural Resources Section	(501) 569-2553/ 2519
1.6	Department Recurring Publications	Natural Resources Section	(501) 569-2553/ 2519
	MCM 2 Public Involvement/Participation		
2.1	Public notice of Stormwater Management Program (SWMP)	Natural Resources Section	(501) 569-2553/ 2519
2.2	Involvement with other entities	Natural Resources Section	(501) 569-2553/ 2519
2.3	Maintain Stormwater Management Program on website	Natural Resources Section	(501) 569-2553/ 2519
2.4	Sponsor Adopt-A-Highway Program	District Engineers	See District Contact List
2.5	Litter Hotline and Reporting	Arkansas Highway Police	(501) 569-2681
2.6	NPDES Standing Committee	Committee Chair-Environmental Division	(501) 569-2285
2.7	Pre-construction meeting with contractors	District Construction Engineer	See District Contact List
	MCM 3 Illicit Discharge Detection and Elimination		
3.1	Storm Sewer System Outfall Collection and Mapping	Natural Resources Section	(501) 569-2553/ 2519
3.2	MS4 dry weather field screening	Natural Resources Section	(501) 569-2553/ 2519
3.3	Maintenance employee training	District Maintenance Engineer	See District Contact List
3.4	Hotline and website reporting for public	Natural Resources Section	(501) 569-2553/ 2519
3.5	Maintenance facility staff assistance visits	Natural Resources Section	(501) 569-2553/ 2519

ARDOT Stormwater Management Program Table of Organization Table D-1			
BMP No.	BMP Description	BMP Point of Contact	Contact Number
	MCM 4 Construction Site Stormwater Runoff Control		
4.1	Training program for Construction personnel	Natural Resources Section/Assistant Chief Engineer-Operations	(501) 569-2522 (501) 569-2221
4.2	New standard features and methods for construction BMPs	Natural Resources Section/State Construction Engineer	(501) 569-2522/ (501) 569-2251
4.3	Erosion and Sediment Control Manual	Natural Resources Section/State Construction Engineer	(501) 569-2522/ (501) 569-2251
4.4	Method for public comments on ARDOT activities	Natural Resources Section	(501) 569-2553/ 2519
4.5	Contractor erosion and sediment control training	State Construction Engineer	(501) 569-2251
4.6	Staff assistance visits to ARDOT construction sites	Natural Resources Section	(501) 569-2553/ 2519
	MCM 5 Post Construction Stormwater Management in New Development and Redevelopment		
5.1	Research and implement new post-construction BMPs as needed	Natural Resources Section/State Construction Engineer	(501) 569-2522/ (501) 569-2251
5.2	Maintenance of permanent BMPs	District Maintenance Engineers	See District Contact List
5.3	Employee training	Natural Resources Section/District Maintenance Engineers	(501) 569-2522/ See District Contact List
5.4	Review plans for new facilities	Natural Resources Section	(501) 569-2553/ 2519
5.5	Review existing facilities	Natural Resources Section	(501) 569-2553/ 2519
5.6	Post construction BMP review	Natural Resources Section	(501) 569-2553/ 2519

ARDOT Stormwater Management Program Table of Organization Table D-1			
BMP No.	BMP Description	BMP Point of Contact	Contact Number
	MCM 6 Pollution Prevention/Good Housekeeping for Municipal Operations		
6.1	Collect and dispose of litter from right of way	District Maintenance Engineer	See District Contact List
6.2	Street sweeping	District Maintenance Engineer	See District Contact List
6.3	Drainage system surveys	District Maintenance Engineer	See District Contact List
6.4	Pollution prevention plans for Department facilities	Natural Resources Section/District Maintenance Engineer	(501) 569-2522/ See District Contact List
6.5	Staff assistance visits to maintenance facilities	Natural Resources Section	(501) 569-2522
6.6	Maintenance employee training	Natural Resources Section/District Maintenance Engineers	(501) 569-2522/ See District Contact List
6.7	Vegetation management	State Maintenance Engineer	(501) 569-2233
6.8	Litter tracking	State Maintenance Engineer	(501) 569-2233

District Contact Information

District 1

2701 Highway 64, P.O. Box 278, Wynne, Arkansas 72396-0278
Telephone: (870) 238-8144 Fax: (870) 238-2994
Counties: Crittenden, Cross, Lee, Monroe, Phillips, St. Francis and Woodruff

District 2

4900 Highway 65 South, P.O. Box 6836, Pine Bluff, Arkansas 71611-6836
Telephone: (870) 534-1612 Fax: (870) 534-2038
Counties: Arkansas, Ashley, Chicot, Desha, Drew, Grant, Jefferson and Lincoln

District 3

2911 Highway 29 North, P.O. Box 490, Hope, Arkansas 71802-0490
Telephone: (870) 777-3457 Fax: (870) 777-3489
Counties: Hempstead, Howard, Lafayette, Little River, Miller, Nevada, Pike and Sevier

District 4

808 Frontier Road, P.O. Box 11170, Barling, Arkansas 72917-1170
Telephone: (479) 484-5306 Fax: (479) 484-5300
Counties: Crawford, Franklin, Logan, Polk, Scott, Sebastian and Washington

District 5

1673 Batesville Boulevard, P.O. Box 2376, Batesville, Arkansas 72503-2376
Telephone: (870) 251-2374 Fax: (870) 251-2393
Counties: Cleburne, Fulton, Independence, Izard, Jackson, Sharp, Stone and White

District 6

8900 Mabelvale Pike, P.O. Box 190296, Little Rock, Arkansas 72219-0296
Telephone: (501) 569-2266 Fax: (501) 569-2366
Counties: Garland, Hot Spring, Lonoke, Prairie, Pulaski and Saline

District 7

2245 California Avenue, P.O. Box 897, Camden, Arkansas 71711-0897
Telephone: (870) 836-6401 Fax: (870) 836-4864
Counties: Bradley, Calhoun, Clark, Cleveland, Columbia, Dallas, Ouachita and Union

District Contact Information

District 8

372 Aspen Lane, P.O. Box 70, Russellville, Arkansas 72811-0070

Telephone: (479) 968-2286 Fax: (479) 968-4006

Counties: Conway, Faulkner, Johnson, Montgomery, Perry, Pope, Van Buren and Yell

District 9

4590 Highway 65, P.O. Box 610, Harrison, Arkansas 72602-0610

Telephone: (870) 743-2100 Fax: (870) 743-4630

Counties: Baxter, Benton, Boone, Carroll, Madison, Marion, Newton and Searcy

District 10

2510 Highway 412 West, P.O. Box 98, Paragould, Arkansas 72451-0098

Telephone: (870) 239-9511 Fax: (870) 236-1156

Counties: Clay, Craighead, Greene, Lawrence, Mississippi, Poinsett and Randolph

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