

ARIZONA POLLUTANT DISCHARGE ELIMINATION SYSTEM (AZPDES)

This document provides pertinent information concerning the reissuance of the Arizona Pollutant Discharge Elimination System (AZPDES) individual stormwater permit listed below. The Arizona Department of Transportation (ADOT) is the owner and operator of the statewide ADOT municipal separate storm sewer system (MS4) that is classified as a Phase I MS4 under the National Pollutant Discharge Elimination System (NPDES) program defined at 40 CFR 122.26(b)(4). The conditions contained in this permit are intended to maintain the Water Quality Standards listed in Arizona Administrative Code (A.A.C.) R18-11-101 *et. seq.* This permit is proposed to be issued for a period of five years.

Permittee	Arizona Department of Transportation (ADOT)
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AZPDES Permit No.	AZS000018
LTF Number	109584

I. BACKGROUND ON STORMWATER REGULATION UNDER THE CLEAN WATER ACT

The regulation of municipal stormwater discharges originated from the Water Quality Act of 1987, which incorporated Section 402(p) into the Clean Water Act (CWA). This section mandates that permits for Municipal Separate Storm Sewer Systems (MS4s) require controls to decrease pollutant discharges to the maximum extent practicable (MEP), as referenced in CWA 402(p)(3)(B)(iii). The U.S. Environmental Protection Agency (U.S. EPA) subsequently developed a phased approach to regulate these discharges under the National Pollutant Discharge Elimination System (NPDES) program. The final regulations for the first phase, known as the Phase I stormwater regulations, were published on November 16, 1990. These regulations required both medium and large MS4s defined under the NPDES program at 40 CFR 122.26(b)(7) and 40 CFR 122.26(b)(4), respectively, to obtain a NPDES permit.

The term "municipal separate storm sewer" is legally defined at 40 CFR 122.26(b)(8) as a system of conveyances including streets, catch basins, curbs, gutters, ditches, and storm drains. The system is owned or operated by a public body (e.g., a state, city, county, special district, or Indian tribe) having jurisdiction over the disposal of sewage, industrial wastes, or stormwater, and which discharges to Waters of the United States (WOTUS). The system must be designed or used for collecting or conveying stormwater and must not be a combined sewer or part of a Publicly Owned Treatment Works (POTW). The ADOT MS4 serves a high-population urbanized area and manages an extensive interconnected system of stormwater conveyances across a network of state highways.

NPDES federal regulations have been incorporated by reference into the Arizona Pollutant Discharge Elimination System (AZPDES) rules in the Arizona Administrative Code (A.A.C. R18-9-A905). This fact sheet provides the rationale and supporting information for the renewal of the Phase I MS4 stormwater permit being issued by the Arizona Department of Environmental Quality (ADEQ) to ADOT. Both the permit and the fact sheet cite federal regulations that provide the regulatory authority for the conditions contained in the permit.

II. NATURE OF DISCHARGE

The discharge from a Phase I MS4 may be variable in volume, flow rate, and duration. Discharge is heavily influenced by local conditions, weather, impervious cover in the watershed, and human activity. The resulting flow is often called urban runoff. Discharges typically only occur during and immediately after a precipitation event. The pollutants in an MS4 discharge are primarily picked up or washed off land surfaces when precipitation occurs.

Any discharge to the MS4 that is not composed entirely of stormwater except discharges pursuant to an AZPDES/NPDES permit and/or other allowable non-stormwater discharges [40 CFR 122.26(b)(2)] are illicit discharges. The Permittee must implement a program to detect, investigate, and eliminate non-stormwater discharges.

III. STATUS OF PERMIT

AZPDES permit applied for	Renewal
Date application received	December 19, 2025
Date application was determined administratively complete	January 23, 2026
Previous permit expiration date	June 30, 2026

IV. STATUS OF COMPLIANCE WITH THE EXISTING AZPDES PERMIT

Date of Most Recent Audit	06/30/2021
Date of Most Recent Inspection	02/27/2025 Inspection ID 462280; no potential violations were noted as a result of this inspection.
Discharge Monitoring Reports (DMR) Reviewed	07/2021 through 11/2025
Lab Reports Reviewed	07/2021 through 11/2025
Notice(s) of Violation (NOV) Issued	None
NOVs Closed	N/A
Formal Enforcement Action(s)	None

V. RECEIVING WATER

The State of Arizona has adopted water quality standards to protect the designated uses of its surface waters. Streams have been divided into segments and designated uses assigned to these segments. The water quality standards vary by designated use depending on the level of protection required to maintain that use. The protected surface water as identified in A.A.C. R18-11 Appendix B for each outfall and the corresponding designated uses are listed in Table 2. Should any WOTUS receiving discharge from this MS4 be listed as impaired or not-attaining on the CWA 303(d) list during the permit term or if a TMDL lists the ADOT MS4 as a point source contributor for the pollutant(s) of concern, the permit requirements outlined in Section 3.4 of the permit will immediately apply. If a WOTUS protected surface water is classified as an OAW during the permit term and has the potential to be impacted by ADOT MS4 discharges, the permit may be reopened and modified in accordance with A.A.C. R18-9-B906 and 40 CFR 122.62 to include additional protective conditions, per Section 3.3 of the permit.

Receiving Water Impairments, Total Maximum Daily Loads (TMDLs), and Outstanding Arizona Waters (OAWs)

At the time of issuance, ADEQ identified impaired receiving waters within one quarter mile of an ADOT MS4 point source discharge based on available information. These segments are included on the 303(d) list by Hydrologic Unit Code (HUC) reach for the pollutants listed below. In accordance with Section 4.4.C, the Permittee shall submit an IDDE Program Inventory of known outfall locations. Discharges to receiving waters on the 303(d) list are subject to the permit conditions outlined in Section 3.4 of the permit.

- Queen Creek — From the headwaters to the Town of Superior WWTP outfall
 - HUC AZ15050100-014A is impaired for copper (listed in 2002) and lead (listed in 2010).
- Nogales Wash — Headwaters to confluence with Potrero Creek
 - HUC AZ15050301-011 is impaired for chlorine and copper (listed in 1996), *E. coli*, (listed in 1998), and ammonia nitrogen (listed in 2004).

At the time of permit renewal, ADEQ identified receiving waters with a U.S. EPA approved TMDL listing the ADOT MS4 as a contributor of point source discharge for the pollutant(s) of concern. The TMDLs with corresponding pollutants of concern are listed below. Discharges to receiving waters with an Approved TMDL are subject to the permit conditions outlined in Section 3.4 of the permit.

- ADEQ, "Gila River: Centennial Wash to Gillespie Dam," OFR 15-03, November 2015.
 - TMDL for boron and selenium
- ADEQ, "Upper Granite Creek Watershed *E. coli* TMDL," OFR 14-08, October 2015.
 - TMDL for *E. coli*
- ADEQ, "Watson Lake TMDL: Total Nitrogen, DO, pH & Total Phosphorus Targets," OFR 14-03, February 2015.
 - TMDL for nitrogen, dissolved oxygen, pH, and phosphorus
 - In a formal letter dated April 6, 2026, the Permittee notified ADEQ that the ADOT MS4 does not discharge into Watson Lake. A section of State Route 89, owned by the City of Prescott, acts as a physical barrier preventing ADOT discharge from reaching the lake. Accordingly, representative monitoring for Watson Lake is not required under this permit.
- ADEQ, "Little Colorado River Silver Creek to Carr Lake Draw Reach # 15020002-004 *Escherichia coli* TMDL," OFR 12-03, June 2013.

- TMDL for *E. coli*
- ADEQ, "Little Colorado River Silver Creek to Carr Lake Draw Reach # 15020002-004 Suspended Sediment Concentration TMDL," OFR 12-05, June 2013.
 - TMDL for suspended sediment concentration (SSC)
- ADEQ, "Oak Creek and Spring Creek Verde River Watershed Total Maximum Daily Loads for *Escherichia coliform*," OFR 10-01, May 24, 2010.
 - TMDL for *E. coli*
- ADEQ, "San Pedro River *E. coli* TMDL Reach #15050203-001," OFR 12-01, August 2013.
 - TMDL for *E. coli*
- ADEQ, "Upper Santa Cruz River Subwatershed Clean Water Plan for *E. coli*," EQR-18-12, February 2020.
 - TMDL for *E. coli*

Outstanding Arizona Water (OAW) means a surface water that is classified as an outstanding state resource water by the Director under A.A.C. R18-11-112. At the time of permit renewal, OAWs known by ADEQ to be receiving waters for ADOT MS4 point source discharge are listed below. Discharges to OAWs are subject to the permit conditions outlined in Section 3.3 of the permit.

- Oak Creek, from its headwaters to its confluence with the Verde River

Monitoring for Discharge to Impaired and TMDL Receiving Waters

The monitoring outfalls listed in Table 1.a are established to monitor stormwater discharge from the ADOT MS4 within one quarter mile of the ordinary high-water mark of a water that is listed as impaired or not-attaining on the 2024 Clean Water Act 303(d) list. The monitoring outfalls listed in Table 1.b are established to monitor stormwater representative of discharge from the ADOT MS4 to a receiving water with a Total Maximum Daily Load (TMDL) approved by the U.S. Environmental Protection Agency (U.S. EPA). Monitoring locations are subject to change and additional monitoring locations may be added to the permit through permit modification based on new information submitted to ADEQ by ADOT during the permit term to meet the reporting requirements specified in Section 3.4 and Section 4.4.C of the permit.

Table 1.a. Stormwater Outfalls Within ¼ Mile of an Impaired or Not-Attaining Receiving Water without a TMDL.

Outfall ID	Latitude	Longitude	Location in Decimal Degrees	HUC Reach	Parameter
Superior Office	33° 17' 14.10" N	111° 06' 40.30" W	33.28725, -111.1112	AZ15050100-014A	Copper, Lead
Superior Fuel (1)	33° 17' 17.10" N	111° 06' 43.45" W	33.2881, -111.1121	AZ15050100-014A	Copper, Lead
Nogales Maintenance (2)	31° 21' 22.97" N	110° 55' 38.96" W	31.3564, -110.9275	AZ15050301-011	Ammonia Nitrogen, Chlorine, Copper, and <i>E. coli</i>

Footnote:

1. Representative monitoring will instead be performed at the nearby ADOT Superior Office Monitoring Outfall, which is closer to Queen Creek.
2. Representative monitoring will instead be performed at the Nogales Stormwater Monitoring Outfall described in Table 1.a above.

Table 1.b. ADOT MS4 Representative Sampling Points for Discharges to Receiving Waters with an EPA-Approved TMDL.

Sampling Point ID	Latitude	Longitude	Location in Decimal Degrees	HUC Reach	Parameter(s)	TMDL
Gila	33° 19' 50.96" N	112° 37' 23.42" W	33.3308, -112.6232	15070101-008	Selenium and Boron	Gila River (Centennial Wash to Gillespie Dam)
Granite	34° 31' 19.35" N	112° 28' 47.05" W	34.5220, -112.4797	15060202-059A	<i>E. coli</i>	Upper Granite Creek
Little Colorado	34° 50' 17.58" N	110° 08' 43.55" W	34.8382, -110.1454	15020002-004	<i>E. coli</i> , Suspended Sediment Concentration	Little Colorado River
Refer to Sedona Stormwater Monitoring Outfall in Table 1.a above for representative discharge monitoring to Oak Creek.				15060202-019 15060202-18A 15060202-18B 15060202-18C 15060202-022 15060202-017	<i>E. coli</i>	Oak Creek
San Pedro	32° 55' 28.08" N	110° 43' 39.33" W	32.9245, -110.7276	15050203-001	<i>E. coli</i>	San Pedro (Lower)
Refer to Nogales Stormwater Monitoring Outfall in Table 1.a above for representative discharge monitoring to the Santa Cruz River.				15050301-009 15050301-008A 15050301-008B 15050301-011 15050301-500B	<i>E. coli</i>	Santa Cruz River

VI. MONITORING OUTFALLS

The monitoring outfalls listed in Table 2.a were determined to be representative of the following land use activities of the drainage area contributing to the system and discharge to a protected surface water. The outfalls may be a mixture of the following land use activities: Residential, Commercial, and Industrial. Table 2.b. details the protected receiving waters for each designated monitoring outfall and the designated uses assigned to each.

Table 2.a. Stormwater Monitoring Points and Outfalls. The primary land uses are estimates provided by the Permittee.

Outfall ID	Latitude	Longitude	Location in Decimal Degrees	Primary Land Use
Phoenix	33° 37' 19.898" N	112° 14' 21.602" W	33.622194, -112.239334	Urban Highway 80 % Commercial Streets 20 %
Tucson	32° 15' 17.183" N	110° 59' 49.254" W	32.254773, -110.997015	Urban Highway 90 % Commercial Streets 10 %
Sedona	34° 51' 44.741" N	111° 45' 43.643" W	34.862428, -111.762123	State Route 90 % Commercial Streets 10 %
Nogales	31° 21' 0.255" N	110° 55' 26.518" W	31.350071, -110.924033	Urban Highway 80 % Commercial Streets 20 %
Flagstaff 2 (1)	35° 10' 20.071" N	111° 39' 56.398" W	35.172242, -111.665666	Urban Highway 76 % Commercial Streets 24 %

Footnote:

1. The Flagstaff 2 monitoring point is located West side of S Beulah Blvd between the I-40 mainline and I-40 eastbound to I-17 ramp near the southwest border of Northern Arizona University, approximately 1.5 miles from the Rio de Flag measured as a linear distance. According to the permittee, stormwater samples collected at this monitoring point are representative of discharge from the ADOT MS4 to the Rio de Flag.

Table 2.b. Receiving Water and Designated Uses for Each Outfall or Monitoring Point.

Outfall or Monitoring Point ID	Monitoring Requirement	Watershed	Receiving Water	Designated Uses (1)	Permit Reference
Phoenix	Monitoring Outfall	Middle Gila Watershed	New River — Below Interstate 17 to confluence with Agua Fria River	A&We, PBC, AgL	Part 5 and Tables 2- 4
Tucson	Monitoring Outfall	Santa Cruz – Rio Magdalena – Rio Sonoyta	Santa Cruz River — Tubac Bridge to Agua Nueva WRF outfall	A&We, PBC, AgL	Part 5 and Tables 2- 4
Sedona	Monitoring Outfall	Verde River Watershed	Oak Creek (OAW) — Below confluence with unnamed tributary to confluence with Verde River	A&Ww, FBC, DWS, FC, AgI, AgL	Section 3.4, Part 5 and Tables 2- 4
Nogales	Monitoring Outfall	Santa Cruz – Rio Magdalena – Rio Sonoyta	Nogales Wash — Headwaters to confluence with Potrero Creek	A&Ww, PBC, FC	Section 3.4, Part 5 and Tables 2- 4
Flagstaff 2	Monitoring Outfall	Little Colorado Watershed	Rio de Flag (EDW) — From City of Flagstaff WWTP outfall to the confluence with San Francisco Wash	A&Wedw, PBC	Part 5 and Tables 2- 4
Superior Office	Impaired Parameter(s) Only, Discrete Sample Type	Middle Gila Watershed	Queen Creek — From the headwaters to the Town of Superior WWTP outfall	A&Ww, PBC, AgL	Section 3.4, Part 5, Table 5, and Table 6
Gila	TMDL Parameter(s) Only, Discrete Sample Type	Middle Gila Watershed	Gila River (EDW) — From the confluence with the Salt River to Gillespie Dam	A&Wedw, PBC, FC, AgI, AgL	Section 3.4, Part 5, Table 5, and Table 6
Granite	TMDL Parameter(s) Only, Discrete Sample Type	Verde River Watershed	Granite Creek — Headwaters to Watson Lake	A&Wc, FBC, FC, AgI, AgL	Section 3.4, Part 5, Table 5, and Table 6
Little Colorado	TMDL Parameter(s) Only, Discrete Sample Type	Little Colorado Watershed	Little Colorado River —Below Lyman Reservoir to confluence with the Puerco River	A&Wc, FBC, DWS, FC, AgI, AgL	Section 3.4, Part 5, Table 5, and Table 6
San Pedro	TMDL Parameter(s) Only, Discrete Sample Type	San Pedro – Willcox Playa – Rio Yaqui Watershed	San Pedro River — From Redington to confluence with the Gila River	A&Ww, FBC, FC, AgL	Section 3.4, Part 5, Table 5, and Table 6

Footnote:

1. The designated use abbreviations are defined as follows: Aquatic and Wildlife cold water (A&Wc), Aquatic and Wildlife warm water (A&Ww), Aquatic and Wildlife effluent dependent water (A&Wedw), Aquatic and Wildlife ephemeral water (A&We), Full Body Contact (FBC), Partial Body Contact (PBC), Domestic Water Source (DWS), Fish Consumption (FC), Agricultural Irrigation (AgI), Agricultural Livestock watering (AgL).

VII. SUMMARY OF PERMIT CHANGES

The following table outlines the major changes from the current permit in this permit renewal. Minor language updates, formatting changes, and reordering to remove ambiguity and improve readability were made throughout.

Current Permit	Permit Change	Reason for Change
The current permit requires the Permittee to develop an Action Plan to address consecutive surface water quality exceedances in a Water of the U.S. (WOTUS) caused by non-routine or ubiquitous stormwater pollutants: copper, lead, and <i>E. coli</i> .	Action Plan for SWQS Exceedances The permit modifies this Action Plan requirement to address consecutive surface water quality standard exceedances for all parameters. Reporting requirements using the MS4 Action Plan Form are specified. See Section 3.2 of the permit.	MS4s discharge stormwater with pollutant concentrations above the surface water quality standards (SWQS) to Arizona's protected surface waters. The Action Plan will clearly document actions taken to mitigate pollutant discharge specific to the outfall and corresponding catchment area for which consecutive monitoring test results exceeded a SWQS. ADEQ will evaluate the Action Plan reports to determine if the Permittee meets the federal Maximum Extent Practicable standard of pollutant control per 40 CFR 122.26(d)(2)(iv). Documented dates of changes to Best Management Practices (BMPs) will inform data evaluation.
ADOT will only monitor discharges to 303(d) listed impaired and 305(b) listed non-attaining waters if the point of discharge is within ¼ mile of the ordinary high-water mark of that listed water, and it has been shown through statistically robust methods and verifiable data that ADOT activities are a significant contributor of the pollutant(s) of concern to those waters.	Discharges from the MS4 to Impaired Waters Without an Approved TMDL The Permittee shall monitor for the specific 303(d) and 305(b) listed parameter(s) for impaired and non-attaining waters throughout the permit term at a representative monitoring point or outfall if the point of discharge is within one quarter mile of the ordinary high-water mark of that listed water. See Section 3.4.A of the permit.	The revised language ensures the collection of essential monitoring data required to determine if the Permittee contributes pollutants of concern to impaired and non-attaining receiving waters. This shift allows the agency to rely on empirical monitoring results rather than prior assumptions to identify significant sources of pollution and ensure water quality standards are met.

Current Permit	Permit Change	Reason for Change
The current permit requires Permittees to develop control measures and monitor for 303(d) listed parameters at a representative outfall if a receiving water is listed as impaired. It stipulates that the Stormwater Management Program (SWMP) must identify BMPs to ensure discharges do not contribute to water quality standard exceedances and includes a general requirement to monitor BMP effectiveness.	Discharges from the MS4 to Impaired Waters Without an Approved TMDL The permit requires a specific monitoring frequency (1x/wet season) for 303(d) listed parameters, requires the Permittee to notify ADEQ within 30 days if a new representative outfall is selected, requires a SWMP update within twelve months of a new impairment, and introduces a prescriptive requirement to report on at least one specific BMP effectiveness metrics (e.g., illicit discharge removal, mass of sediment removed, or trend analysis) annually. See Section 3.4.A, Table 5, and Table 6 of the permit.	These revisions establish clear, measurable, and enforceable conditions that facilitate regulatory oversight. By specifying a "once per wet season" frequency and requiring formal notification of new outfalls, ADEQ ensures that monitoring data is consistent and readily available via Discharge Monitoring Reports (DMRs). The requirement to report specific BMP metrics provides the necessary data to verify that the Permittee is meeting the federal Maximum Extent Practicable standard of pollutant control per 40 CFR 122.26(d)(2)(iv), ultimately supporting the goal of returning impaired waters to attaining status.
The current permit requires the SWMP to be consistent with established TMDLs and any associated Wasteload Allocations (WLAs). The Permittee must identify BMPs intended to meet these allocations and conduct monitoring for the associated parameters.	Discharges from the MS4 to Receiving Waters with an Approved TMDL The permit maintains consistency with TMDL requirements but adds specific administrative and technical benchmarks. Permittees must update their SWMP within twelve months of a TMDL approval and align their monitoring frequency with the Characterization Monitoring schedule (1x per permit term in one summer wet season and one winter wet season). The permit further clarifies that WLA requirements, if assigned to discharge from the ADOT MS4, remain in effect regardless of future changes to the water's impairment status in the Integrated Report. Like the non-TMDL section, it requires annual reporting on specific BMP effectiveness metrics and formal notification of outfall selections not previously listed in the permit. See Section 3.4.B, Table 5, and Table 6 of the permit.	This revision clarifies exactly what is expected and when. The six-month deadline to update the SWMP ensures that new TMDL WLAs are put into action quickly. Once a cleanup goal (WLA) is set, it stays in place even if the receiving water status changes. By standardizing monitoring frequency and tracking BMP effectiveness, ADEQ can better evaluate if the Permittee meets the federal Maximum Extent Practicable standard of pollutant control per 40 CFR 122.26(d)(2)(iv).

Current Permit	Permit Change	Reason for Change
SWQS Exceedances Notification and Planning Notifications are submitted to ADEQ at azpdes@azdeq.gov.	SWQS Exceedances Notification Section 3.2 of the permit now solely covers the Action Plan. Requirements for SWQS Exceedances Notification and Planning are now specified in Section 3.5. SWQS exceedance notification required must be submitted to ADEQ at stormwatercompliance@azdeq.gov See Section 3.5 of the permit.	The Action Plan permit requirement has been made more comprehensive and prescriptive to clearly define triggering events, qualifying actions, allowed timelines, and reporting requirements. These explicit and prescriptive conditions establish clear, measurable, and enforceable standards for the Permittee to ensure accountability and effective decrease in pollutant loading and source identification. For clarity, permit requirements not related to the Action Plan were relocated to other sections.
SWQS exceedance notification must be submitted to ADEQ at azpdes@azdeq.gov.	SWQS Excursions Notification Notification of SWQS excursions required per Section 3.5 of the permit must be submitted to ADEQ at stormwatercompliance@azdeq.gov See Section 3.5 of the permit.	This change will streamline ADEQ follow-up process for reported SWQS exceedances.
Qualifying target groups for education and outreach and qualifying topics are not specified.	Qualifying Community Target Groups The qualifying target group for education and outreach is the General Public Served by the MS4. See Section 4.2.A.1.a of the permit.	The permit specifies a qualifying target group category with a defined population that the Permittee can identify and track as part of a targeted behavioral change program. The requirement that target group must be 'served by the MS4' ensures that education and outreach efforts are focused on the permitted area, fostering active engagement where it directly impacts water quality.

Current Permit	Permit Change	Reason for Change
Qualifying target groups for education and outreach and qualifying topics are not specified.	Qualifying Professional Target Groups Qualifying professional target groups for education and outreach are professional development project proponents active within the MS4, construction site operators active within the MS4, commercial or industrial businesses within the MS4, or other professionals associated with stormwater pollutant sources active within the MS4. See Section 4.2.A.2.a of the permit	The permit replaces broad industry sectors with functional roles that the Permittee can identify and track as part of a targeted behavioral change program. The requirement that target groups must be 'served by the MS4' ensures that education and outreach efforts are focused on the permitted area, fostering active engagement where it directly impacts water quality.
The 4 th year annual report shall include an evaluation of the target audience in a subject area and any changes adopted in response to targeted behaviors in order to be more effective.	Public Education and Outreach The evaluation of behavior change among a targeted audience is replaced with a data evaluation documenting specific actions taken by the Permittee to encourage community members to reduce pollutant discharges to the MS4. The data evaluation must be presented in tables and/or graphs and submitted as an attachment to the annual report. See Section 4.2.B of the permit.	Under 40 CFR 122.26(d)(2)(iv) and (v), Stormwater Management Programs (SWMPs) must assess control measures to ensure pollutants reduction to the maximum extent practicable. Public education and outreach are fundamental to this goal and quantitative evaluation is required to measure their impact. This revision replaces speculative assessments of long-term community behavioral change with quantifiable reporting. By evaluating objective data, the Permittee can document progress, ensure accountability, and adapt outreach strategies to meet enforceable performance standards.
The Permittee shall host an annual public SWMP workshop.	Public Involvement and Participation Requirement removed. See Section 4.3 of the permit.	This requirement was removed due to the lack of documented measurable performance benefits relevant to protecting surface water quality.

Current Permit	Permit Change	Reason for Change
The Permittee shall maintain an inventory of all known MS4 outfalls, interconnections with other MS4s, major outfalls identified as priority for illicit discharges, drainage areas, and receiving waters. A copy of the storm sewer system map must be available for review by the permitting authority upon request. Each mapped outfall must be given a unique identifier.	Illicit Discharge Detection and Elimination (IDDE) The Permittee is required to submit a copy of the MS4 Areawide Illicit Discharge Detection and Elimination (IDDE) Program Inventory and Map to ADEQ with the second-year annual report. The Inventory includes all points critical for regulating pollutant discharges from the MS4 to protected surface waters. It may be submitted as an Excel Spreadsheet file or as a Feature Service, Shapefile, or Feature Class file type. The Map is the map of the regulated MS4 area and should be submitted as a Geographic Information System (GIS)-compatible file type. Updates to the inventory must be submitted electronically by the due date of the subsequent annual reports. See Section 4.4.C of the permit.	The requirement for the Permittee to submit the GIS map and outfall coordinates (rather than just maintaining them internally) is necessary to ensure ADEQ (the state NPDES regulatory authority) can effectively fulfill its oversight and enforcement mandates under the Clean Water Act including TMDL development, enforcement, and source tracking. Submitting GPS coordinates for all known MS4 outfalls provides ADEQ with essential information to ensure the Permittee meets the NPDES standard of Maximum Extent Practicable control of pollutants, per 40 CFR 122.26(d)(2)(iv), and achieves the water quality standards required by 40 CFR 122.44(d)(1). Submission of the detailed text description of the MS4 service area is required by 40 CFR 127.
In documenting an unknown source or intermittent illicit discharge, ADOT shall maintain written documentation for review by ADEQ.	Source of the Illicit Discharge Requirement removed. See Section 4.4.F of the permit.	This requirement was removed to eliminate the ambiguity of what the Permittee's legal responsibility is to produce a report describing an unknown source of illicit discharge and ADEQ's role as a reviewer of such a report. Rather, the Permittee shall determine and document through its investigations the source of all illicit discharges to the maximum extent practicable.

Current Permit	Permit Change	Reason for Change
Illicit Discharge Detection and Elimination (IDDE) Activities Summary is required in tabular format to track and maintain records. Required fields for the table are specified.	Illicit Discharge Detection and Elimination (IDDE) Illicit Discharge Detection and Elimination (IDDE) Activities Summary requires the outfall ID number and coordinates for the closest downgradient MS4 outfall that may discharge to a protected surface water. The table shall be delivered as an attachment to the Annual Report using the Microsoft Excel template provided by ADEQ. See Section 4.4.H of the permit.	The requirement for the Permittee to specify the outfall that either received the illicit discharge or was most likely to receive the illicit discharge, as well as the distance of that outfall from the verified location where the illicit discharge occurred, is necessary to ensure ADEQ can effectively fulfill its oversight and enforcement mandates under the Clean Water Act. This essential information will be used to ensure the Permittee meets the NPDES standard of Maximum Extent Practicable control of pollutants, per 40 CFR 122.26(d)(2)(iv), and achieves the water quality standards required by 40 CFR 122.44(d)(1). Submission of table as a Microsoft Excel file ensures that the information is received in a legible and usable format.
The Permittee shall develop and update at least annually an inventory, database, list, map, or other equivalent tracking system of facilities and activities with potential stormwater pollutant generating sources.	Facilities Pollution Prevention and Good Housekeeping Practices The permit clarifies required facility types to include on the ADOT Facilities Inventory, establishes a risk assessment framework to categorize facility risk levels for discharge of pollutants to the MS4, and defines annual inventory reporting requirements.. See Section 4.5.A of the permit.	These explicit and prescriptive permit requirements establish clear, measurable, and enforceable permit conditions for the Permittee.

Current Permit	Permit Change	Reason for Change
The Permittee shall implement practices, policies, and procedures to reduce stormwater impacts associated with runoff from ADOT operational rights-of-way and maintenance activities.	Measures to Control Discharge from Highway Operations and Maintenance The Permittee shall implement practices, policies, and procedures to reduce stormwater impacts associated with maintenance activities and stormwater runoff lands owned and operated by the State of Arizona that discharge to the MS4 including, but are not limited to: parking lots, streets, roads, highways, buildings, parks, road right-of-way, maintenance yards, and stormwater treatment and flow control BMPs/facilities. See Section 4.6.E of the permit.	40 CFR 122.26(d)(2)(iv)(A)(1) requires that MS4 programs include maintenance activities and a list of structural and non-structural control measures to reduce pollutants. The revised permit language introduces a comprehensive, non-exhaustive list of specific facility and land use types owned or operated by ADOT that must be managed to reduce stormwater impacts to protected surface waters from the MS4.
Report suspected non-filers to AZPDES@azdeq.gov.	Non-filer Reporting Report suspected non-filers to stormwatercompliance@azdeq.gov. See Section 4.7.A.3, Section 6.4, and the Part 9.0 definition for non-filer in the permit.	This change will streamline ADEQ follow-up process for reported potential non-filers under the AZPDES Construction General Permit (CGP).
Non-filer notification shall contain a means of communication with operators of these facilities to inform them of their responsibility to comply.	Non-filer Identification and Reporting The requirement for the Permittee to communicate to non-filers the responsibility to comply with the AZPDES permitting requirement to submit an NOI for CGP coverage was removed. See Section 4.7.A.3, Section 6.4, and the Part 9.0 definition for non-filer in the permit.	The Permittee must not enforce the state requirement to obtain permit coverage under the AZPDES CGP, but general information about the construction project or industrial facility is to be collected and provided to ADEQ within 30-days of discovery.
The Permittee shall create an inspection prioritization schedule for construction sites.	Construction Sites The permit renewal specifies that the prioritization ranking of the Construction Project Inventory will be refined and reviewed by the Permittee to inform construction site inspection scheduling. See Section 4.7.C of the permit.	This explicit and prescriptive permit requirement establishes a clear, measurable, and enforceable permit condition for the Permittee.

Current Permit	Permit Change	Reason for Change
The Permittee shall inspect construction sites identified in the inventory in accordance with the CGP and document the inspection protocols.	Construction Sites The Permittee shall develop a system to review and prioritize the Construction Project Inventory to inform inspection scheduling. The Permittee shall ensure that ADOT oversees inspection of construction project sites identified in the Construction Project Inventory at a frequency that complies with the CGP and ensure that authorized ADOT personnel conduct on-site inspections of contractor compliance with the CGP at least every three months for each construction project. See Section 4.7.D of the permit.	The revised language replaces a vague reliance on general CGP compliance with a risk-based prioritization system that establishes clear, enforceable minimum inspection frequencies. This structured approach fulfills the 40 CFR 122.26(d)(2)(iv)(D)(3) requirement for MS4 program to include specific procedures to identify and prioritize sites for inspection based on their potential water quality impact.
The Permittee shall evaluate and document three areas within the MS4 on which the Permittee will perform a retrofit feasibility assessment. The three proposed areas were submitted in the first-year annual report and the feasibility assessment was submitted in the fourth-year annual report.	Post-Construction Controls Requirement removed. See Section 4.8.A of the permit.	The retrofit feasibility assessment is replaced by the Action Plan for SWQS Exceedances in Section 3.2 of the permit to satisfy the federal requirement at 40 CFR 122.26(d)(2)(iv) for the Permittee to reduce the discharge of pollutants to the Maximum Extent Practicable using management practices, control techniques and system, design and engineering methods, and such other provisions which are appropriate. The Action Plan may implement post-construction controls (40 CFR 122.26(d)(2)(iv)(D)) to achieve the water quality standards required by 40 CFR 122.44(d)(1).

Current Permit	Permit Change	Reason for Change
The Permittee shall inspect 100% of sites discharging to the MS4 from areas of new development or redevelopment within one year following construction completion to determine the compliance of their post-construction stormwater control and achievement of 80% of the BMP's design standard for detention, retention, or treatment constitutes compliance.	Post-Construction Controls The Permittee shall continue to implement a robust post-construction program that includes inspection of sites identified in the Construction Project Inventory for post-construction controls following construction completion. The Permittee shall document its oversight of post-construction stormwater BMPs to ensure they are properly completed and maintained. This documentation must include compliance and enforcement data presented in both tables and graphs. This evaluation shall be updated annually and submitted as an attachment to the annual report. See Section 4.8.B of the permit.	Post-construction stormwater management in areas undergoing new development or redevelopment mitigates pollutant discharges to Arizona's protected surface waters. While an initial inspection within one year of construction ensures proper installation, a 100% inspection rate alone does not guarantee long-term post-construction BMP functionality. Additionally, the 80% achievement threshold was removed because the performance of diverse BMPs cannot always be accurately quantified or measured against a fixed design standard in the field. This revision provides the Permittee with the flexibility to implement a more robust program and quantitative data to track the inventory, inspection, and maintenance required to protect water quality over time.
A qualifying storm event is defined as rainfall in the amount of 0.1 inches or more and a resulting discharge. Sampling shall be performed on qualifying storm events at least 72 hours after a previous qualifying storm event.	Qualifying Storm Event If rainfall occurs intermittently separated by timeframes of less than 72 hours, that intermittent precipitation is considered part of the same single storm event. If collection during the first 30 minutes is not practicable, samples must be collected as soon as possible thereafter, but in no case shall discrete sample collection be initiated more than 3 hours after the start of the discharge. See Section 5.2.A of the permit.	The new permit language aligns with sampling requirements at 40 CFR 122.21(g)(7)(ii) to clearly define how to address "intermittent" rain and when a new storm event officially begins. It also establishes strict timeframes for "first flush" and composite sampling to ensure the data collected is consistent and scientifically defensible.

Current Permit	Permit Change	Reason for Change
Each season the Permittee shall record qualifying storm events occurring at each outfall until all samples required to be collected during that season are obtained from the outfall.	Storm Event Records Each wet season the Permittee shall record qualifying storm events occurring at each monitoring outfall until all samples required to be collected during that season are obtained from the outfall. Storm event monitoring shall be reported using the Microsoft Excel template provided by ADEQ. Additional information required on the storm event record includes total discharge flow (in gallons), indication if the stormwater sample was collected within the allowed timeframe, sample type, and if the first flush was collected. See Section 5.2.B of the permit.	The additional requirements meet federal requirements specified at 40 CFR 122.26(d)(2)(iii) and are necessary for ADEQ to evaluate data usability against program data quality objectives is necessary to ensure ADEQ can effectively fulfill its oversight and enforcement mandates under the Clean Water Act including pollutant loading approximations for TMDL development, enforcement, and source tracking.
The Permittee shall sample stormwater discharges from the MS4 to Waters of the U.S. at the monitoring outfalls.	Stormwater Sampling Stormwater samples shall be collected at the monitoring outfalls prior to mixing with receiving water or just prior to discharge. See Section 5.2.C.1 of the permit.	This explicit and prescriptive permit requirement meets federal requirements specified at 40 CFR 122.26(d)(2)(iii)(A) and establishes a clear, measurable, and enforceable permit condition for the Permittee and ensures that the monitoring results are representative of the discharge.

Current Permit	Permit Change	Reason for Change
1x/wet season sampling is “Analytical Wet Weather Monitoring” 1x /wet season during year 4 of the permit term is “Analytical Wet Weather Characterization Monitoring during Year 4”	Monitoring Frequency 1x/ Wet season sampling is “Seasonal Monitoring” 1x / Permit term (1 Summer & 1 Winter Wet Season) is “Characterization Monitoring” See Section 5.2.D, Table 3, and Table 4 of the permit.	The monitoring type names were updated to better reflect the required frequency and avoid confusion. The Permittee is now required to collect and analyze samples for Characterization Monitoring during one winter and one summer wet season within the first three years of the permit term. To ensure ADEQ receives the necessary data to protect water quality, the permit includes a flexibility provision: an extension is available if the Permittee is unable to collect the required samples within the initial three years due to insufficient discharge events or other unforeseen disruption to scheduled monitoring. Extension requests must be emailed to stormwatercompliance@azdeq.gov.
Analytical Wet Weather Monitoring does not specify units or monitoring type for average flow rate.	Seasonal Monitoring Seasonal monitoring for average flow rate shall be performed using a continuous flow meter and reported on the Discharge Monitoring Report (DMR) in gallons per minute (gpm). See Table 3 of the permit.	This explicit and prescriptive permit requirement meets federal requirements specified at 40 CFR 122.26(d)(2)(iii)(A) and establishes a clear, measurable, and enforceable permit condition for the Permittee.
Chromium VI monitoring not required.	Seasonal Monitoring The following applies requirement applies if an Aquatic and Wildlife designated use applies to the receiving water for the monitoring outfall: If total chromium exceeds 8 µg/L the Permittee must conduct sampling for chromium VI (dissolved) for the remainder of the permit term at a monitoring frequency is 1x/wet season for that outfall. Otherwise, monitoring for chromium VI (dissolved) is not required. See Table 3 and Footnote 5 of Table 3 of the permit.	The aquatic and wildlife numeric water quality standards for chromium VI are more stringent than total chromium due to the high toxicity and solubility of chromium VI. To ensure the permitted discharge achieves the water quality standards required by 40 CFR 122.44(d)(1), monitoring for total chromium may serve as an indicator parameter for chromium VI for monitoring performed at an outfall unless a test result for total chromium exceeds the 8 µg/L threshold.

Current Permit	Permit Change	Reason for Change
Characterization monitoring not required for the following parameters: 1,1-dichloroethylene, 1,2-Dichloropropane, Styrene, Bis (2-Chloroethyl) Ether, Bis (2-Ethylhexyl) Phthalate, 4-Bromophenyl Phenyl Ether, Benzidine, Alachlor, Carbaryl, Carbofuran, Chlorpyrifos, Diazinon, 2,3,7,8-TCDD, and Butyl benzyl phthalate	Characterization Monitoring Monitoring required for Characterization Monitoring at a frequency of 1x / Permit Term (1 Summer & 1 Winter Wet Season). See Table 4 of the permit.	The requirement to monitor these parameters is based on their having applicable numeric acute water quality standards for aquatic and wildlife protection and an approved test method. Acute standards are specifically designed to safeguard aquatic organisms from the immediate, short-term toxic effects of a pollutant. Monitoring is necessary to ensure the discharge concentration remains below this critical short-term threshold. Federal regulations (40 CFR 122.44(d)(1)) require NPDES permits to include monitoring for all pollutants that have the reasonable potential to cause or contribute to an excursion above any State water quality standard.
Characterization monitoring not required for the following parameters: Bis (2-chloroethoxy) methane and 4-Chlorophenyl Phenyl Ether	Characterization Monitoring Monitoring required for Characterization Monitoring at a frequency of 1x / Permit Term (1 Summer & 1 Winter Wet Season) See Table 4 of the permit.	Monitoring for these specific parameters is required because they are listed on the U.S. EPA Priority Pollutant List. Although established numeric water quality standards are absent for these pollutants, monitoring is necessary to ensure the discharge is protective of the narrative water quality standard found in A.A.C. R18-11-108(5). This standard prohibits surface waters from containing pollutants in amounts that are toxic to humans, animals, plants, or other organisms. Furthermore, federal regulations (40 CFR 122.44(d)(1)) require NPDES permits to include monitoring for all pollutants that have the reasonable potential to cause or contribute to an excursion above any State water quality standard, including such narrative criteria.

Current Permit	Permit Change	Reason for Change
If the Permittee collects samples or conducts sample analysis in house, the Permittee shall obtain a copy of the applicable QA procedures.	Sample Collection and Analysis If the Permittee collects samples or conducts sample analysis in-house, the Permittee shall develop a QA Manual that addresses these activities. If a third party collects samples or conducts sample analysis on behalf of the Permittee, the Permittee shall obtain a copy of the applicable QA procedures. See Section 5.3 of the permit.	Correction of language for accuracy and clarity.
The QA Manual shall be updated as necessary to reflect current conditions. Required contents are specified.	Sample Collection and Analysis The QA Manual shall be updated as necessary to reflect current conditions. Required contents are specified and the following required contents were added: • Sample collection frequency, • When and where samples will be collected, • How samples will be collected, • Laboratories that will perform analyses, • Any field tests to be conducted, and • Types, sizes, and number of sample bottles needed. See Section 5.3.A of the permit.	Added content ensures a comprehensive QA Manual that covers essential sample collection and analysis details and aligns the QA Manual contents requirement with other individual AZPDES permits to ensure equitable permit conditions.
Use of sufficiently sensitive test methods is not specified.	Sample Collection and Analysis The Permittee shall use analytical methods prescribed in A.A.C. R9-14-610, 40 CFR 136.3, or an alternative analytical method approved under A.A.C. R9-14-610(C) and is sufficiently sensitive in accordance with 40 CFR 136.1(c). See Section 5.3.C.2 of the permit.	The Limit of Quantitation (LOQ) must be low enough to allow comparison of the results to the applicable water quality standards to be protective of the receiving water designated uses. New language clarifies the requirement that parameters must be analyzed using sufficiently sensitive test methods in accordance with 40 CFR 136.1(c).

Current Permit	Permit Change	Reason for Change
Quality control requirements specified in the approved test method not mentioned.	Sample Collection and Analysis Analytical work must meet the quality control standards specified in the approved test methods. See Section 5.3.C.3.	This requirement is included to ensure the validity, accuracy, and legal defensibility of all monitoring data reported by the Permittee. The federal regulations at 40 CFR Part 136 require all monitoring data used to demonstrate compliance with the permit to be generated using approved analytical methods. The quality control specified within those approved test methods are integral to the method.
No unique requirements specific to mercury monitoring.	Sample Collection and Analysis The Permittee shall use an ADHS-certified low-level mercury analytical method such as EPA method 245.7 or 1631E to achieve a reporting limit at or below the most stringent surface water quality standard applicable to the receiving water for the stormwater discharge. The permittee shall also use a “clean hands/dirty hands” sampling technique such as EPA Method 1669 if necessary to achieve these reporting limits. See Section 5.3.C.4 of the Permit.	This requirement is necessary to ensure the permittee achieves a reporting limit at or below the most stringent surface water quality standard applicable to the receiving water. Federal regulations (40 CFR 122.45(c)) require that all analyses be performed using approved analytical methods that are sufficiently sensitive. Given the extreme toxicity and low numerical value of the mercury aquatic and wildlife criteria the use of an ultra-low-level method and rigorous clean sampling techniques is mandatory to generate data that is legally defensible and accurately reflects the potential of the discharge to cause or contribute to a water quality standard excursion.
DMRs shall be submitted within 30 business days of receipt of all lab reports for all methods at each outfall.	Discharge Monitoring Report The permittee shall complete and submit a DMR no later than 30 calendar days following the last day of the wet season. See Section 6.1, Table 1, and Table 7 of the permit.	The updated permit language enhances clarity and enforceability by establishing an unambiguous fixed seasonal compliance reporting date. Using calendar days eliminates confusion associated with defining business days. Establishing the final reporting deadline as the 30th day of the month following the end of the wet season provides a firm and easily confirmed date to ensure all required data are submitted on a timely seasonal cadence.

Current Permit	Permit Change	Reason for Change
The reports produced during a monitoring period are required to be electronically submitted with the DMR and include copies of laboratory reports and bench sheets for field testing parameters.	Discharge Monitoring Report Attachments to the DMR shall additionally include Storm Event Records. See Section 6.1.C of the permit.	Storm Event Records must be submitted as attachments to the DMR to verify that sampling was conducted under valid and representative conditions, as required by the permit. This requirement ensures the permittee is documenting the specific conditions under which stormwater samples were collected and guaranteeing the data is representative of the discharge as required by the permit and federal regulations (40 CFR 122.41(j)).
The annual report must be submitted on a form provided by ADEQ. If electronic reporting becomes available during the permit term, ADEQ will notify the Permittee that all future annual reports must be submitted electronically through myDEQ.	Annual Report The annual report must be submitted electronically through myDEQ. See Section 6.2 of the permit.	Electronic reporting for the annual report through myDEQ is available. Electronic reporting is required by federal regulation at 40 CFR 127.
Permit location of the following sections and parts: • Section 4.2 Employee Training • Section 4.3 Enforcement Measures and Tracking	The permit conditions were reordered and the permit locations were updated as follows: • Part 7.0 Employee Training • Section 4.9 Enforcement Measures and Tracking	This revision standardizes the order of conditions and structure of the eight Phase I MS4 individual AZPDES permits, specifically the order of sections 4.1 through 4.8 of Part 4.0 Stormwater Management Program (SWMP) to ensure consistency and facilitate the comparison of conditions among the permits.
Best Management Practices (BMPs) definition.	Definitions Best management practices mean methods, measures, or practices to prevent or decrease discharges and includes structural and nonstructural controls and operation and maintenance procedures. See Part 9.0 of the permit for the full definition.	Definition was updated to match the definition in the AZPDES MSGP.

Current Permit	Permit Change	Reason for Change
Construction Support Activity not defined.	Definitions Construction support activity means a construction-related activity that exclusively supports the construction site and involves activities such as clearing, grading, excavating, and stockpiling of fill materials or pollutant-generating activities of its own. These activities may or may not be contiguous with the construction site. See Part 9.0 of the permit for the full definition.	Defining a construction support activity is a critical component of defining construction activity, which is mentioned in the permit under Part 1.0 Authorization and Part 2.0 Legal Authority.
Control Measure or Controls definition.	Definitions Control Measure or Controls means any practice or method (including discharge limitations) used to prevent or reduce the discharge of pollutants to protected surface waters. Structural controls refer to physical controls installed on site; non-structural controls refer to best management practices, such as good housekeeping. See Part 9.0 of the permit.	Definition was updated to match the definition in the AZPDES CGP.
Interconnection not defined.	Definitions Interconnection means a type of field screening outfall where discharge from the Permittee's MS4 enters another MS4 or where discharge from another MS4 enters the Permittee's MS4. See Part 9.0 of the permit.	The definition was added to provide clarity for Effective IDDE Program Inventory requirements, per Section 4.4.C of the permit.

Current Permit	Permit Change	Reason for Change
Non-filer not defined.	Definitions Non-filer means an entity that is required to obtain coverage under an AZPDES Construction General Permit (CGP) or Multi-Sector General Permit (MSGP) but has failed to submit a Notice of Intent (NOI) or otherwise secure permit coverage for discharges to Arizona protected surface waters or to a Municipal Separate Storm Sewer System (MS4) conveyance leading to Arizona protected surface waters. See Part 9.0 of the permit.	Defining a non-filer is critical to bridge the gap between Permittee oversight and ADEQ oversight. Only facilities that meet the applicability criteria for the AZPDES CGP or MSGP coverage are considered non-filers for those permits.
Priority Outfall not defined.	Definitions For the purposes of this permit, Priority Outfall means an outfall from the MS4 identified by the Permittee through consideration of discharge to an impaired water, discharge to an Outstanding Arizona Water (OAW), discharge to a perennial water or through consideration of illicit discharge history as priority for illicit discharges or other non-stormwater flows. Priority Outfalls may be identified during dry weather screening visual inspection that may be accompanied by sample collection to identify illicit discharge. See Part 9.0 of the permit.	By identifying priority outfalls, specifically those discharging to sensitive waters or with a history of illicit activity, the Permittee enable ADEQ to strategically allocate state resources to target high-risk locations for statewide water quality assessments. This transparency ensures that both the permittee and the regulator are focused on the areas where monitoring and intervention will have the greatest environmental impact.

VIII. SUMMARY OF PERMIT CONDITIONS

1.0 Authorization

ADOT's service population was determined to exceed 250,000 based on the 1990 census, thus establishing the state agency as an operator of a large municipal separate storm sewer system under the Phase I stormwater regulations. This permit applies to discharges to Waters of the U.S. from the storm sewer system.

2.0 Legal Authority

Conditions for the Permittee to establish the legal authority to carry out the permit requirements are specified in Part 2.0 of this permit. Adequate legal authority is required to implement and enforce most parts of the Stormwater Management Program (SWMP) [See 40 CFR 122.26(d)(2)(i)]. Without adequate legal authority the MS4 would be unable to perform many vital SWMP functions such as performing

inspections and requiring installation of control measures. In addition, the permittee would not be able to penalize and/or attain remediation costs from violators.

3.0 Arizona Surface Water Quality Standards (SWQS)

The Permittee is required to protect water quality by ensuring, to the maximum extent practicable (MEP), that its MS4 discharges do not cause or contribute to an exceedance of any surface water quality standard applicable to a Water of the U.S. (WOTUS) receiving water. This obligation is outlined in federal regulations at 40 CFR 122.26(d)(2)(iv)) and incorporated by reference in A.A.C. R18-9-A905. To comply with this requirement, the Permittee must fully implement and maintain the provisions of their SWMP and all other conditions specified within this permit.

If at least two consecutive quantified test results from the same outfall indicate a SWQS excursion, the Permittee shall fulfill the Action Plan requirements in Section 3.2 based on the following:

- Copper, Lead, and *E. coli*
Submit the Action Plan Form as an attachment to the annual report. One submission for each outfall/parameter satisfies the reporting requirement for the permit term unless the Permittee modifies its planned actions to mitigate SWQS exceedances, in which case an updated Action Plan Form must be attached to the subsequent Annual Report.
- All Other Parameters
Submit the Action Plan Form as an attachment to the DMR. Reporting requirements are satisfied once two consecutive test results for that parameter/outfall meet the applicable SWQS.

4.0 Stormwater Management Program (SWMP)

4.1 **Program Implementation**

The Phase I stormwater regulations [40 CFR 122.26(d)(2)(iv)] identified the following general components of a SWMP:

1. Measures to reduce pollutants from commercial and residential areas;
2. Measures to control illicit connections and illegal dumping to the storm sewer system;
3. Measures to reduce pollutants from industrial facilities; and
4. Measures to reduce pollutants from construction sites.

The Phase I regulations on SWMP requirements are specified in 40 CFR 122.26(d) and are incorporated by reference into the state rules.

4.2 **Public Education and Outreach**

The public education and outreach program must be tailored and targeted to specific water quality issues of concern in the relevant community. These community-wide and targeted issues must then guide the development of the comprehensive outreach program, including the creation of appropriate focus topics and educational materials. The permit includes a list of potential residential and commercial issues, but the permittee may also choose other issues that contribute significant pollutant loads to stormwater.

The underlying principle of any public education and outreach effort is to change behaviors. The Permittee shall document actions that demonstrate how it encourages community members to reduce pollutant discharges to the MS4 to the maximum extent practicable presented in tables and/or graphs with a brief description of how the Permittee's progress compares to previous

years. This evaluation shall be performed annually and submitted as an attachment to the annual report.

4.3 Public Involvement and Participation

This permit requires the involvement of the public, which includes opportunities for citizens to participate in implementation of the stormwater program. Public participation in implementation of the stormwater program can include many different activities such as stream clean-ups, storm drain markings, and volunteer monitoring. Permittees are encouraged to work together with other entities that have an impact on stormwater (for example: schools, homeowner associations, DOTs, or other MS4 permittees).

4.4 Illicit Discharge Detection and Elimination (IDDE)

The Clean Water Act, Section 402(p)(3)(B)(ii) mandates MS4 permits to “effectively prohibit non-stormwater discharges into the storm sewers.” The permit implements this federal requirement by requiring the Permittee to develop robust procedures to investigate and eliminate illicit discharges. Furthermore, the permit standardizes the reporting process by introducing a specific format for documenting these discharges and submitting the information to ADEQ in the annual report.

In recognition of the complexity of the statewide service area, the Permittee may provide a detailed text statement that describes the MS4 service area instead of providing a GIS compatible polygon layer. The requirement for the Permittee to submit a detailed text description of the MS4 service area and its Effective Illicit Discharge Detection and Elimination (IDDE) Program Inventory (as specified in Section 4.4.C) is necessary to ensure ADEQ can effectively fulfill its oversight and enforcement mandates under the CWA, including TMDL development and source tracking. The detailed text description of the MS4 service area is required to comply with federal electronic reporting requirements at 40 CFR Part 127. Additionally, the requirement for Phase I MS4 permittees to provide GPS coordinates (latitude/longitude) for all outfalls, interconnections, and receiving waters in the Effective IDDE Program Inventory is essential to inform ADEQ of conditions necessary to achieve Water Quality Standards (WQS), as mandated by 40 CFR 122.44(d)(1). An accurate, modern inventory is essential for ADEQ’s iterative process of identifying and controlling the source of pollutants impacting surface water quality. Furthermore, the requirement for an Effective IDDE Program Inventory reflects the standard for effective stormwater management. The requirement for MS4s to meet Maximum Extent Practicable is a performance standard that is intended to be dynamic and adaptive. The criteria for Maximum Extent Practicable evolve as technology and institutional capabilities improve. Utilizing modern GIS mapping is a Best Management Practice (BMP) for maintaining an effective IDDE program and managing stormwater assets. Requiring submission enables effective regulatory oversight to ensure the MS4 is employing the Maximum Extent Practicable level of control for identifying and controlling pollutant sources, which aligns with the general program requirements in 40 CFR 122.26(d)(2)(iv). Since the MS4’s infrastructure and the surrounding land use change over time, requiring an updated, modern map in a renewal is necessary to ensure the IDDE program remains effective. The Effective IDDE Program Inventory shall be submitted as attachments to the second-year annual report and thereafter as attachments to the annual reports if updates were made during the reporting year.

Section 4.4.E.1 of the permit requires the Permittee to immediately respond to all reports of illicit discharges which constitute a threat to human health or the environment. An example of an appropriate immediate response includes Hazmat responses. Otherwise, response to reports of

illicit discharge shall involve investigation within five business days for at least 90% of all reports of illicit discharges, per Section 4.4.E.2 of the permit.

4.5 State Facilities Pollution Prevention and Good Housekeeping Practices

State of Arizona owned and operated facilities serve as hubs of activity for a variety of staff from many different departments. Some municipalities will have one property at which all activities take place (e.g., the maintenance yard), whereas others will have several specialized facilities such as those listed above. An inventory, list, database, map, or other equivalent tracking system of such facilities will help staff responsible for stormwater compliance build a better awareness of their locations within the MS4 service area and their potential to contribute stormwater pollutants. The facility inventory will also serve as a basis for setting up periodic facility assessments and developing, where necessary, facility stormwater pollution prevention plans. SWPPPs are necessary only for heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee not covered by an MSGP per 4.5.B.1.

4.6 Measures to Control Discharge from Highway Operations and Maintenance

The permit requires a program to address roadway and storm sewer system maintenance, cleaning and repair, vegetation management, erosion abatement and winter storm policies. Specific requirements include repairs, maintenance, and cleaning for roadways used for stormwater conveyance and ADOTs storm sewer system. Maintenance from roadways includes inspections, proper waste disposal, and good housekeeping measures.

4.7 Construction Sites

MS4 permits must address construction-related requirements (and often more specific state requirements) found in the following Federal regulations - Phase I MS4 Regulations 40 CFR 122.26(d)(2)(iv)(D). Stormwater discharges from construction sites generally include sediment and other pollutants such as phosphorus and nitrogen, turbidity, pesticides, petroleum derivatives, construction chemicals, and solid wastes that may become mobilized when land surfaces are disturbed. The permit requires MS4 permittees to require construction site operators at defined sites to meet certain minimum stormwater requirements relating to erosion and sediment control and pollution prevention, and to meet other restrictions imposed on them by the State, or local regulations. These minimum requirements clearly specify the expectations for addressing erosion control, sediment control, and pollution prevention control measures at construction sites.

4.8 Post-Construction

Developed land changes the hydrology of sites, increasing impervious surfaces which lead to higher stormwater discharge volumes and higher pollutant loads. The purpose of implementing a post-construction standard under 4.8.B.1 is to decrease stormwater pollutants by maintaining or restoring stable hydrology in receiving waters thereby protecting water quality by having post-construction hydrology mimic the original natural hydrology of the area. This requirement is achieved through continuation of an inspection, maintenance, and tracking program for post-construction stormwater BMPs.

The applicable post-construction standards are documented in the “ADOT Post-Construction Best Management Practices Manual.”

Section 4.8.A.1.a also provides that “the Permittee may also implement a program of equivalent efficacy, provided that such a program’s adequacy is documented by the Permittee prior to discharge.” A common example of such an equivalent program would be an update or change to the Permittee’s post-construction best management practices manual. Such updates or changes

are common. Provided the updates or changes to the Permittee's stormwater standards manual do not lessen environmental protections from the version referenced in the permit such changes are permissible.

5.0 Monitoring Requirements

Monitoring conditions were developed to meet the following objectives:

- To characterize stormwater quality and identify stormwater pollutants;
- To detect and eliminate illicit discharges; and
- To evaluate the effectiveness of specific control measures and implementation of the SWMP as a whole, in minimizing the discharge of pollutants.

Each season the Permittee shall record qualifying storm events (0.1 inches or more and resulting in a discharge) occurring at each monitoring outfall in the Storm Event Record.

Stormwater samples shall include whenever possible the "first flush" (first 30 minutes of stormwater discharge) of a qualifying storm event to identify initial pollutants that may shock surface waters, as well as assess the effectiveness of structural controls, such as retention basins, in managing the first flush of pollutants. The first flush may also be effective in detecting non-stormwater discharges to the stormwater system because such pollutants may be flushed out of the system during the initial portion of the discharge. This permit requires the Permittee to maintain monitoring records, including the volume, duration, and flow rate of stormwater discharge.

Stormwater samples shall be collected from the first qualifying storm event of each wet season defined in Table 1 of the permit, and subsequent qualifying storm events, as necessary, to complete the required Seasonal Monitoring and Characterization Monitoring at each monitoring outfall listed in Table 2 of the permit. If sampling of subsequent storm events is necessary to complete the requisite monitoring, stormwater samples shall be collected from qualifying storm events that are at least 72 hours (3 calendar days) after a previous qualifying storm event. If rainfall occurs intermittently separated by timeframes of less than 72 hours, that intermittent precipitation is considered part of the same single storm event. A new storm event does not begin until there has been a 72-hour period of no measurable rainfall. If the required Characterization Monitoring cannot be completed within first three years of the permit term, the Permittee must submit a written request to ADEQ by email at stormwatercompliance@azdeq.gov for an extension. For a reporting year, monitoring for all parameters listed in Table 3 and Table 4 of the permit shall be completed at the frequency specified.

6.0 Reporting Requirements

6.1 **Discharge Monitoring Reports (DMRs)**

This permit requires the Permittee to conduct wet weather sampling throughout the permit term. Discharge monitoring records (DMRs) through myDEQ will be available for the Permittee to submit their monitoring results. The reports will be electronically submitted along with the following attachments:

1. Original copies of certified laboratory reports,
2. Original copies of bench sheets or similar documentation for field testing parameters,
3. Storm Event Records, and
4. For all field testing, or if the information below is not included on the laboratory reports, the permittee shall attach a bench sheet or similar documentation to each DMR that includes, for all analytical results during the reporting period the following:
 - a. The analytical result;

- b. The number or title of the approved analytical method, preparation and analytical procedure utilized by the field personnel or laboratory, and the LOD and LOQ for the analytical method for the parameter; and
- c. Any applicable data qualifiers using the most current revision of the Arizona Data Qualifiers.

Sample Collection for the 2026 Summer Wet Season (June 01 – October 31, 2026)

Sampling results must be reported under the permit coverage active at the time of sample collection. Samples collected for the Summer Wet Season (June 01, 2026 – October 31, 2026) prior to the permit renewal effective date shall be reported on the current permit DMR. If these results fulfill any seasonal monitoring requirements in Table 3 of the renewal permit, they may be applied toward satisfying the 2026 Summer Wet Season requirements in the permit renewal. To do this for the renewal permit the Permittee may enter NODI 9 (Conditional Monitoring — Not Required This Period) on the DMR for the specific parameters and outfalls already reported to ADEQ for any for any 2026 Summer Wet Season sampling.

6.2 Annual Report

The Permittee shall submit an annual report that summarizes the progress of the SWMP and findings of monitoring events for each year of the permit term. The annual report will be submitted electronically through myDEQ. The reporting period for the annual report will be July 1 – June 30. The annual report is due by September 30th of each year of the permit term.

6.3 Renewal Application

This permit requires that a renewal application is submitted at least 180 days prior to expiration of the permit. The application form provided by ADEQ submitted as an attachment to the 4th year annual report in myDEQ will satisfy the 40 CFR 122.21(d)(2) federal requirement to reapply 180 days prior to the permit expiration date and ensure the Permittee meets renewal application requirements specified in A.A.C. R18-9-B904(B).

6.4 Suspected Non-filers

The suspected non-filer reporting condition is retained in this permit for the MS4 to report any suspected construction activities or industrial activities occurring without the required AZPDES permit coverage to discharge stormwater associated with those activities (e.g., CGP and MSGP non-filers). See the definition for non-filer in Part 9.0 Definitions of the permit. The evaluation that an operator is lacking AZPDES permit coverage will be based on inspection of the site or facility, or other information available to the Permittee, such as public complaints, business licenses, building permits, and other ADOT records. The Permittee must not enforce the state requirement to obtain permit coverage, but general information about the construction project or industrial facility is to be collected and provided to ADEQ on a monthly basis. This reporting can be accomplished by e-mail to the stormwatercompliance@azdeq.gov inbox. The subject line for the non-filer report should include "Non-filer - MS4 Permittee Name - AZPDES Permit Number."

7.0 Employee Training

In accordance with 40 CFR 122.26(d)(2)(iv)(D) training for new and existing employees is required on topics of illicit discharge detection and elimination (IDDE), pollution prevention, good housekeeping practices, industrial and commercial facilities, construction sites, and post-construction site plan review and inspection.

8.0 Standard AZPDES Permit Conditions & Notification

In accordance with 40 CFR 122.41, conditions applicable to all NPDES permits are included in Part 7.0 of this permit. Other standard conditions are specified in this permit in accordance with 40 CFR 122.21, 122.22, 122.64, Arizona Revised Statutes, and the Clean Water Act.

IX. ADMINISTRATIVE INFORMATION

Public Notice (A.A.C. R18-9-A907)

The public notice is the vehicle for informing all interested parties and members of the general public of the contents of a draft AZPDES permit or other significant action with respect to an AZPDES permit or application. The basic intent of this requirement is to ensure that all interested parties have an opportunity to comment on significant actions of the permitting agency with respect to a permit application or permit. This permit will be public noticed online on ADEQ's website after a pre-notice review by the applicant and other affected agencies.

Public Comment Period (A.A.C. R18-9-A908)

Rules require that permits be public noticed on ADEQ's website or in a newspaper of general circulation within the area affected by the facility or activity. The public comment period begins on the publication date of the notice and extends for 30 calendar days. ADEQ shall respond to all significant written comments submitted during the public comment period when a final permit decision is reached or when a final permit is issued.

Public Hearing (A.A.C. R18-9-A908(B))

A public hearing may be requested in writing by any interested party. The request should state the nature of the issues proposed to be raised during the hearing. A public hearing will be held if the Director determines there is a significant amount of interest expressed during the 30-day public comment period, or if significant new issues arise that were not considered during the permitting process.

EPA Review (A.A.C. R18-9-A908(C))

A copy of this draft permit and any revisions made to this draft as a result of public comments received will be sent to EPA Region 9 for review. If EPA objects to a provision of the draft, ADEQ will not issue the permit until the objection is resolved.

X. ADDITIONAL INFORMATION

Additional information relating to this permit may be obtained from:

Arizona Department of Environmental Quality
Water Quality Division – Surface Water Protection Permits
Attn: Corin Hammond
1110 West Washington Street
Phoenix, Arizona 85007

Or by contacting Corin Hammond at (602) 771 - 4144 or by e-mail at hammond.corin@azdeq.gov.

XI. INFORMATION SOURCES

While developing effluent limitations, monitoring requirements, and special conditions for the permit, the following information sources were used:

1. AZPDES Permit Application received December 19, 2025, along with supporting data, facility diagram, and maps submitted by the applicant with the application. Additional information was received by ADEQ on March 05, 2026 and April 06, 2026.
2. ADEQ files on the Arizona Department of Transportation MS4.
3. ADEQ Geographic Information System (GIS) Website.
4. Arizona Administrative Code (AAC) Title 18, Chapter 11, Article 1, Water Quality Standards for Surface Waters, adopted December 31, 2016.
5. A.A.C. Title 18, Chapter 9, Article 9. Arizona Pollutant Discharge Elimination System rules.
6. Code of Federal Regulations (CFR) Title 40:
 - a. 122, *EPA Administered Permit Programs: The National Pollutant Discharge Elimination System.*
 - b. 127, *NPDES Electronic Reporting.*
 - c. 136, *Guidelines Establishing Test Procedures for the Analysis of Pollutants*
7. U.S. EPA NPDES Permit Writers' Manual, September 2010.
8. U.S. EPA, "Transportation Stormwater Permit Compendium," EPA-833-R-18-001, August 2018.
9. ADOT Research Center, "Evaluating Total Maximum Daily Load Pollutants from ADOT's Storm Sewer System Discharges," SPR-761, March 2023.
10. ADOT, "Technical Memo: Evaluating Total Maximum Daily Load Pollutants from ADOT's Storm Sewer System Discharges," SPR-761, Submitted by Wood Environment & Infrastructure Solutions, Inc., June 11, 2021.
11. ADEQ, "Gila River: Centennial Wash to Gillespie Dam," OFR 15-03, November 2015.
12. ADEQ, "Upper Granite Creek Watershed E. coli TMDL," OFR 14-08, October 2015.
13. ADEQ, "Watson Lake TMDL: Total Nitrogen, DO, pH & Total Phosphorus Targets," OFR 14-03, February 2015.
14. ADEQ, "Little Colorado River Silver Creek to Carr Lake Draw Reach # 15020002-004 *Escherichia coli* TMDL," ORF 12-03, June 2013.
15. ADEQ, "Little Colorado River Silver Creek to Carr Lake Draw Reach # 15020002-004 Suspended Sediment Concentration TMDL," OFR 12-05, June 2013.
16. ADEQ, "Oak Creek and Spring Creek Verde River Watershed Total Maximum Daily Loads for *Escherichia coliform*," OFR 10-01, May 24, 2010.