



*Environmental
Health and Safety*

March 27, 2023

Texas Commission on Environmental Quality
Team Leader
Stormwater & Pretreatment Team, MC-148
P.O. Box 13087
Austin, Texas 78711-3087

RE: Phase II MS4 Annual Report for The University of Texas at El Paso
TPDES # TXR040334 for General Permit Authorization

Dear Team Leader:

This letter serves to transmit the required annual report for the Texas Pollutant Discharge Elimination System Small Municipal Separate Storm Sewer System General Permit, Authorization number TXR040334 for The University of Texas at El Paso, a level 2 non-traditional campus MS4 within an Urbanized Area.

The annual report is for calendar year 2022, beginning 01/01/2022 and ending 12/31/2022.

A separate Notice of Change has not been submitted based on the fact that changes have not been proposed for the next permit year.

As required by the general permit, a copy of the report has been mailed to the TCEQ's region 6, at 401 E. Franklin Ave, Suite 560, El Paso, Texas 79901-1212.

Sincerely,

A blue ink signature of Emilio Rodriguez, written in a cursive style.

Emilio Rodriguez
Assistant Vice President
Environmental Health and Safety
The University of Texas at El Paso
500 W. University
El Paso, Texas 79968-0648
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Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number TXR040334

A. General Information

Authorization Number: TXR040334

Reporting Year (year will be either 1, 2, 3, 4, or 5): 9

Annual Reporting Year Option Selected by MS4:

Calendar Year: x

Permit Year: _____

Fiscal Year: _____ Last day of fiscal year: (____)

Reporting period beginning date: (month/date/year) 01/01/2022

Reporting period end date: (month/date/year) 12/31/2022

MS4 Operator Level: 2, non-traditional

Name of MS4: The University of Texas at El Paso

Contact Name: Emilio Rodriguez

Telephone Number: 915-747-7124

Mailing Address: 500 W. University Ave., El Paso, TX 79968-0648

E-mail Address: erodriguez22@utep.edu

A copy of the annual report was submitted to the TCEQ Region: YES x NO _____

The annual report was submitted to: TCEQ Region 6

B. Status of Compliance with the MS4 GP and SWMP

1. Provide information on the status of complying with permit conditions:
(TXR040000 Part IV.B.2)

	Yes	No	Explain
Permittee is currently in compliance with the SWMP as submitted to and approved by the TCEQ.	Yes		The SWMP implementation applies to all areas under the jurisdiction of the University or properties it controls. No new areas have been added or acquired since the issuance of the permit.
Permittee is currently in compliance with recordkeeping and reporting requirements.	Yes		Recordkeeping has been via emails, photographs, Excel spreadsheets and Facilities Services (operations) work orders. A continuing effort to consolidate files into a single repository of electronic data is underway.
Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.).	Yes		The university meets compliance history eligibility as a level 2 non-traditional MS4.
Permittee conducted an annual review of its SWMP in conjunction with preparation of the annual report	Yes		The SWMP dated July 2019 was reviewed and amended in September 2020. No modifications have been made to the SWMP since 2020.

2. Provide a general assessment of the appropriateness of the selected BMPs. You may use the table below to meet this requirement (**see Example 1 in instructions**):

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
1: Public Education, Outreach and Involvement	Public Education Pamphlets and Training Program Inlet markings Engagement of Student Organizations	Yes, Active and ongoing Yes, active and ongoing with periodic review of inlet markings through active work orders of maintenance Yes, active and ongoing with newspaper and magazine advertisements.
2: Illicit Discharge Detection and Elimination	Map all outfalls and inlets for the Campus Train field staff Perform field screening of waterways and inlet/outfalls.	Yes, No changes made from last year. A total of 91 inlets and outfalls were identified and mapped by Facilities. Yes, Personnel have been trained to recognize illicit sources and actively address with prompt resolution. Yes, there were no illicit discharges detected in the calendar year through screening.
3/4: Construction Site Control and Post-Construction Site Control	Require ESC for sites at and above 1 acre Perform rain event screenings	Yes, there is one site over 1 acre in the calendar year beginning in December 2022. No applicable rain event in December 2022.
5: Pollution Prevention & Good Housekeeping for Municipal Operations	Train all Facilities and grounds contracted staff Housekeeping inspections of waste accumulation areas.	Yes, personnel received requisite awareness training for good housekeeping. Yes, shops are routinely cleared of accumulated materials that could otherwise become contaminants or floatables.

3. Describe progress towards achieving the goal of reducing the discharge of pollutants to the MEP. If no progress was made or the BMP did not result in a reduction in pollutants, provide an explanation. Use the table below to meet this requirement (**see Example 2 in instructions**):

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
1	Public Education	Training Newsprint Publication Outreach meetings/events	1,285 6 1	Employees Publications Tabling Events	No, but indirectly causes awareness that promotes reduction. One event took place
2	Dry weather screening Rain event screening	Outfalls along arroyo	5 3	Inspections Work orders for clearing	Yes, Inspections and work orders noted floatables and overgrowth to be removed by campus staff
3/4	Construction site inspection	Construction sites	3	Inspections	Three construction site inspections occurred in 2022

5	O&M Operations Housekeeping	SOP	undetermined	Waste collections	Yes, Prompt housekeeping of grounds prevents pollutants entering the waterways in wind and rain events.

4. Provide the measurable goals for each of the MCMs, and an evaluation of the success of the implementation of the measurable goals (**see Example 3 in instructions**):

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
1	Training of Personnel	Met goal – Trained 95.72% of active employees assigned the training during the calendar year.
1	Conduct meetings and cleanups with student organizations.	Did not meet goal – met with one student organization but this did not lead to a cleanup event.
1	Map campus inlets	Met goal – All are marked and numbered, and mostly mapped by Facilities group.
2	Perform arroyo and inlet inspections following rain events over 0.25 inches.	Met goal – Seven rain events over 0.25 inches occurred, and three work orders were generated via electronic email request.
3/4	Pre-construction plan reviews.	Pre-construction activities occurred for 2022 for a construction site over 1 acre. Several pre-construction meetings occurred in 2022 to review the project SWPPP, ESC, NOI and inspection schedule and training.

4	Perform site inspections following rain events over 0.25 inches and high winds	No rain events over 0.25 inches occurred during the construction site development starting in December 2022.
5	Housekeeping at plant areas	Met goal – Shop cleanings and visual monitoring by managers.
5	Contractor awareness training	Construction site development occurred in December 2022 which impacted more than 1 acre. Contractor awareness training occurred on October 4, 2022, in preparation of site development.

C. Stormwater Data Summary

Provide a summary of all information used, including any lab results (if sampling was conducted) to assess the success of the SWMP at reducing the discharge of pollutants to the MEP. For example, did the MS4 conduct visual inspections, clean the inlets, look for illicit discharge, clean streets, look for flow during dry weather, etc.?

Besides visual observations during dry weather walks of the arroyos and inspections following rain events, the campus has not performed any stormwater quality testing or analysis. A lack of visible evidence of discharges has led the campus to believe that no such testing should occur. We may however perform water quality testing at the entry point to the campus where the continuous 3 gpm flow has been noted. As mentioned previously, this flow is not discolored in any way, nor does it appear to impact the ability of plant life to flourish.

D. Impaired Waterbodies

1. Identify whether an impaired water within the permitted area was added to the latest EPA-approved 303(d) list or the Texas Integrated Report of Surface Water Quality for CWA Sections 305(b) and 303(d). List any newly-identified impaired

waters below by including the name of the water body and the cause of impairment.

Not applicable

2. If applicable, explain below any activities taken to address the discharge to impaired waterbodies, including any sampling results and a summary of the small MS4's BMPs used to address the pollutant of concern.

Not applicable

3. Describe the implementation of targeted controls if the small MS4 discharges to an impaired water body with an approved TMDL.

Not applicable

4. Report the benchmark identified by the MS4 and assessment activities:

Benchmark Parameter <i>(Ex: Total Suspended Solids)</i>	Benchmark Value	Description of additional sampling or other assessment activities	Year(s) conducted
Not applicable			

5. Provide an analysis of how the selected BMPs will be effective in contributing to achieving the benchmark:

Benchmark Parameter	Selected BMP	Contribution to achieving Benchmark
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<i>Not applicable</i>		

6. If applicable, report on focused BMPs to address impairment for bacteria:

Description of bacteria-focused BMP	Comments/Discussion
Not applicable	

7. Assess the progress to determine BMP's effectiveness in achieving the benchmark.

For example, the MS4 may use the following benchmark indicators:

- number of sources identified or eliminated;
- number of illegal dumpings;
- increase in illegal dumping reported;

- number of educational opportunities conducted;
- reductions in sanitary sewer flows (SSOs); /or
- increase in illegal discharge detection through dry screening.

Benchmark Indicator	Description/Comments
Not applicable	

E. Stormwater Activities

Describe activities planned for the next reporting year:

MCM(s)	BMP	Stormwater Activity	Description/Comments
1: Public Education, Outreach and Involvement	Public Education Pamphlets and Training Program	Advertise stormwater pollution prevention awareness to students, faculty and staff	Produce and distribute public education pamphlets during campus events and advertise stormwater pollution prevention through the campus newspaper.
2: Illicit Discharge Detection and Elimination	Perform field screening of waterways and inlet/outfalls.	Train MS4 field staff to perform dry weather screening inspections and identify illicit discharge sources	Provide illicit discharge reporting, response and enforcement

3/4: Construction Site Control and Post- Construction Site Control	Require ESC for sites at and above 1 acre	Perform a minimum of one documented inspection for construction sites above 1 acre.	A small construction site notice has been submitted in October 2022 for stormwater activities beginning in December 2022.
5: Pollution Prevention & Good Housekeeping for Municipal Operations	Train all Facilities and grounds contracted staff	Inform or train staff involved in good housekeeping practices	Develop an operation & maintenance program to identify housekeeping and BMP's to reduce pollutants for Physical Plant crews, grounds crews, outdoor field laboratories, and fleet maintenance activities.

F. SWMP Modifications

1. The SWMP and MCM implementation procedures are reviewed each year.

☒ Yes ☐ No

2. Changes have been made or are proposed to the SWMP since the NOI or the last annual report, including changes in response to TCEQ's review.

☐ Yes ☒ No

If "Yes," report on changes made to measurable goals and BMPs:

MCM(s)	Measurable Goal(s) or BMP(s)	Implemented or Proposed Changes (Submit NOC as needed)
Not Applicable		

Note: If changes include additions or substitutions of BMPs, include a written analysis explaining why the original BMP is ineffective or not feasible, and why the replacement BMP is expected to achieve the goals of the original BMP.

3. Explain additional changes or proposed changes not previously mentioned (i.e. dates, contacts, procedures, annexation of land, etc.).

G. Additional BMPs for TMDLs and I-Plans

Provide a description and schedule for implementation of additional BMPs that may be necessary, based on monitoring results, to ensure compliance with applicable TMDLs and implementation plans.

Not applicable

BMP	Description	Implementation Schedule (start date, etc.)	Status/Completion Date (completed, in progress, not started)
Not applicable			

H. Additional Information

1. Is the permittee relying on another entity to satisfy any permit obligations?

☐ Yes ☒ No

If "Yes," provide the name(s) of other entities and an explanation of their responsibilities (add more spaces or pages if needed).

Name and Explanation:

Name and Explanation:

Name and Explanation:

Name and Explanation:

2.a. Is the permittee part of a group sharing a SWMP with other entities?

☐ Yes ☒ No

2.b. If "yes," is this a system-wide annual report including information for all permittees?

☐ Yes ☐ No

If "Yes," list all associated authorization numbers, permittee names, and SWMP responsibilities of each member (add additional spaces or pages if needed):

Authorization Number: _____ Permittee: _____

Authorization Number: _____

Permittee: _____

Authorization Number: _____

Permittee: _____

Authorization Number: _____

Permittee: _____

I. Construction Activities

1. The number of construction activities that occurred in the jurisdictional area of the MS4 (Large and Small Site Notices submitted by construction site operators):

___ One single project in the last quarter of the calendar year _____

- 2a. Does the permittee utilize the optional seventh MCM related to construction?

___ Yes ___x___ No

- 2b. If "yes," then provide the following information for this permit year:

The number of municipal construction activities authorized under this general permit	
The total number of acres disturbed for municipal construction projects	Not applicable

Note: Though the seventh MCM is optional, implementation must be requested on the NOI or on a NOC and approved by the TCEQ.

J. Certification

If this is this a system-wide annual report including information for all permittees, each permittee shall sign and certify the annual report in accordance with 30 TAC §305.128 (relating to Signatories to Reports).

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.

Name (printed): Emilio Rodriguez Title: Assistant Vice President

Signature:  Date: 03/27/2023

Name of MS4: The University of Texas at El Paso, a level 2 non-traditional MS4

Name (printed): _____ Title: _____

Signature: _____ Date: _____

Name of MS4 _____

Name (printed): _____ Title: _____

Signature: _____ Date: _____

Name of MS4 _____

Name (printed): _____ Title: _____

Signature: _____ Date: _____

Name of MS4 _____

Name (printed): _____ Title: _____

Signature: _____ Date: _____

Name of MS4 _____

If you have questions on how to fill out this form or about the Stormwater Permitting program, please contact us at 512-239-4671.

Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, contact us at 512-239-3282.