THE UNIVERSITY OF TEXAS AT EL PASO

Stormwater Management Program

July 2019 (amended Sept 2020)

This SWMP is for a level 2 non-traditional small MS4 that is a State-owned and operated university campus. Approximately 1,200 students reside within campus residence halls, with another 29,000 faculty, staff and students commuting to the campus from neighboring municipal jurisdictions outside of the boundaries of the subject university based MS4.

All operations on the campus are under the direct management of the campus administration through its own employees or contracted personnel performing services for the direct benefit of the university campus. It is not a municipality with a diverse constituency of private business and industry. There are not industrial sources present at the MS4. Therefore Minimum Control Measures 1, 2, 3, 4, 5 and 7 are applicable as designated for a level 2 non-traditional small MS4.

1. Minimum Control Measure (MCM):

a. Public Education, Outreach and Involvement

Outreach efforts are to operational units within the campus organization, construction contractors performing services to the campus, and to students through handouts, flyers and campus newspaper advertisements. Outreach to businesses and industrial facilities are not applicable under MCM 1 because we do not have such entities operating on the campus.

A. Best Management Practice (BMP): SWMP includes a storm water education and outreach program to educate public employees, students and visitors about hazards associated with the illegal discharges and improper disposal of waste and about the impacts storm water can have on water quality, including steps they can take to reduce pollutants in storm water.

- Produce and distribute public education pamphlets pertaining to storm water pollution impact and prevention.
- Provide storm drain inlet stenciling/marking to identify inlets to be protected against illicit discharges.
- Train employees on storm water pollution sources, identification and prevention using Computer-Based Web Training Modules.
- Advertise Storm water Pollution Prevention awareness to students through the campus newspaper.

B. Minimum Measure Objective:

The University of Texas El Paso, Environmental Health and Safety Department (EHS) developed and implemented computer based training for its employees which is repeated annually. Additionally it produces and distributes educational materials for the University community, construction site operators, and visitors by providing educational pamphlets and training to appropriate personnel whose activities may contribute to storm water pollution.

C. Measurable Goals implemented and continuing in each calendar year as follows:

- Public education pamphlets pertaining to Storm water Pollution Impact and Prevention awareness.

  Implemented/Continuing Measurable Goal: The Environmental Health and Safety Department (EHS) developed and distributes pamphlets to the University community, construction site operators, student residents, and visitors. The pamphlets are distributed in lobbies and waiting areas of university buildings where public access is routine. These resources will be reproduced and refreshed in January of each calendar year ahead of promotion efforts that will occur during Earth Week (April). An accounting of these educational and promotional items will be made in the annual report.

- Storm Drain Inlet Stenciling/Marking

  Implemented/Continuing Measurable Goal: EHS has installed storm drain curb markers, indicating "No Dumping, Drains to Waterways". The curb markers are affixed to all storm drain inlets located within University property along with a unique number assignment. A review of all numbered inlets in December of each calendar year will assure that no storm drain marker is missing, and that new storm drains have the curb marker affixed. An accounting of these storm drain curb markers will be made in the annual report.

- Computer-Based Training (CBT) of employees on storm water pollution and prevention

  Implemented/Continuing Measurable Goal: EHS has developed and provides annually Computer Based Training (CBT) to employees whose activities may affect the quality of storm water. Targeted employees include all Physical Plant personnel (automobile

maintenance personnel, grounds crew personnel, building maintenance, etc…), art department faculty, and engineering and science faculty. Training focuses on identifying storm water pollution impact activities specific to the campus operations and identifies methods of identification for illicit discharges and for prevention. The training is assigned to employees and affected individuals in October of each calendar year. An accounting of for the number of persons trained using CBT will be made in the annual report.

- Provide SWMP and Annual Reports via MS4 website

  Measurable Goal: UTEP will publish its MS4 SWMP via an MS4 link at the website http://www.utep.edu/ehs/, along with annual reports. **The date to be implemented will be April 30th, 2021, one month following the 2020 Annual Report due date.**

b. Public Involvement

The SWMP is for a level 2 non-traditional small MS4 that is a State-owned and operated University campus, and not a municipality with a diverse constituency of private business and industry. However there is a diversity of operations within the campus organization. All such operations on the campus are under the direct management of the campus administration through its own employees or contracted personnel performing services for the direct benefit of the campus. Therefore public involvement under MCM 1 is handled both through awareness campaigns and training implemented via the computer-based training. The campus constituency is also provided informational pamphlets with contacts for reporting suspected illicit discharges to eh&s@utep.edu, phone the campus EH&S MS4 operator at (915) 747-7124, or use the Compliance Helpline (888) 228-7713. These same communication means may be used to provide feedback on the information provided in the pamphlets. Equally monthly meetings occur with students of the campus at the Student Union where student organizations are invited to participate in discussion with members of Student Government and the Green Fund Committee. These monthly meetings afford the opportunity for student involvement in outreach planning for volunteer activities such as arroyo clean-up or other public education efforts regarding the state of environmental cleanup efforts, including storm water protection for the campus MS4.

A. Best Management Practice (BMP):

- Involve student organizations in awareness campaign efforts and other volunteer events aimed at education and clean-up of conveyances.

- Hold regular meetings with affording student organizations to participate and offer input on plans for public education and outreach

B. Minimum Measure Objective:

Involve students in developing, reviewing and recommending storm water pollution prevention priorities and programs.

C. Measurable Goals:

- Involve student organizations in planning efforts for public outreach events

  Measurable Goal implemented: Solicit student organizations through participation in regular monthly Student Government and Green Fund Committee meetings to discuss public awareness campaigns, education awareness materials and volunteer events to promote Pollution Prevention, including events to clean-up the campus conveyances. Report number of student organizations contacted or participating in the regular meetings in the annual report. **Goal shall be to contact three organizations of students per calendar year beginning 2021 reporting year.**

- Hold annual meetings with student government organization to present and receive input from students on promotion efforts

  Measurable Goal implemented: Annual meetings will be held (to coincide with Earth Day planning activities) to receive comment and constructive input regarding the University's storm water management program and organization of volunteer events. Report on number of student organizations represented at the annual meeting in the annual report. Goal shall be to reach three organizations per calendar year and involve the organizations in Earth Day events and arroyo cleanup events. Two events will be planned to coincide with both Spring and Fall semesters. **Two promotion events will occur each calendar year by December 15th, 2020.**

2. Minimum Control Measure (MCM):
Illicit Discharge Detection and Elimination (IDDE)

Rainfall in El Paso is highly seasonal with amounts generally less than 8 inches per year. The MS4 storm conveyances and arroyos are dry throughout the year except

during rare rainfall events. Dry weather screening may be accomplished in any given month of the year. However the UTEP MS4 endeavors to perform these screenings in May/June and November/December time periods of each calendar year to minimize disruption of other campus activities. The dry weather screenings of storm drainage system outfalls along the dry arroyo conveyances are conducted to identify non-storm water flows, suspect illicit discharges, and to identify any debris and other floatables to be removed. Areas noted with apparent discharges are further followed up-gradient to determine exact source of discharge and to investigate if such sources are illicit in nature. Work orders for support from the campus Facilities Services are generated to facilitate correction of any deficient items found for improvement. Temporary means for control of illicit discharges may include the strategic use of dams, berms and diversion into a sanitary sewer system, where permitted.

Reports of illicit discharges may occur at any time. When such reports occur they may come in via email to eh&s@utep.edu or by phone at (915) 747-7124. EH&S will dispatch trained personnel to investigate any such report within one business hour of the report and will take actions to immediately remedy any identified actual illicit discharge that could feasibly place the public or the environment at risk. Such incidents will be reported to TCEQ within 24 hours. Any illicit discharge having potential to reach the receiving water body of the Rio Grande through the adjacent MS4, the City of El Paso, will be raised to the attention of the City of El Paso's MS4 operator in order that they may assist in implementing control measures. Again, work orders for corrective action support may be generated to campus Facilities Services group since they function as our campus public works organization, and they may where warranted solicit support in such instances from the City of El Paso public works or the El Paso Water Utilities Public Service Board where such support is necessitated by the scale of response required by the evolving discharge event.

MS4 EH&S staff attend training and local County and Municipal EOC exercises in association with other regional jurisdictions' MS4 personnel to better understand and coordinate practices available to detect and investigate illicit discharge sources and/or connections. New staff will receive On-the Job-Training (OJT) with already trained personnel until the next formal course or training exercise is available.

A. Best Management Practices (BMPs):

- Establish and maintain a Storm Drain Map with outfalls and inlets
- Train MS4 field staff to perform dry weather screening inspections, identify illicit discharge sources, and direct mitigation of discharges
- Illicit discharge reporting, response and enforcement

- Procedures to investigate and correct leaking onsite sewer systems **UTEP does not have any onsite sewage disposal systems within the boundaries of its MS4**

B. Minimum Measure Objective:

Maintain an up-to-date comprehensive map of the storm drain system for the University campus according to the requirements outlined in the permit. Carry out twice annual dry weather inspections of the principle conveyances and associated outfalls to identify and remove illicit discharges, establish enforcement actions to be taken with identified responsible parties, and encourage public involvement in eliminating and reporting illicit discharges. Train EH&S personnel to perform inspections, record results and to direct mitigation of illicit discharges identified. Respond timely to reports of illicit discharges, with reporting of risks to the public and/or the environment.

C. Measurable Goals:

- Storm Drain Map

  In regards to the mapping of outfalls, an existing campus topographic map has been enhanced to include a numbered blue circle at the location of each outfall and storm sewer inlet on the campus. The numbers assigned correspond to a unique inventory number for each location. Inspection results are documented through work orders that use this same number as an identifier when corrective actions are warranted. The map also identifies major channels that cross the campus. There are no receiving waters along or adjacent to the campus nor within the boundaries of the MS4. As such they are not reflected on the MS4 map.

  Measurable Goal: A Storm Drainage map has been developed by the campus. While this map has been useful, it is also an extremely large file. The University has been using an ArcGIS system to manage information related to the inlets and outfalls of the campus. It will continue to serve as a resource for reference by MS4 staff in tracking of efforts related to inspections and maintenance. It will be updated routinely each calendar year to reflect most current conditions, reflecting any new outfalls and inlets. The **total number of inlets and outfalls will be reported in the annual report each calendar year beginning with 2020 annual report**.

- Train MS4 field staff to 1) perform dry weather screenings to identify potential illicit discharge sources, 2) record and investigate

reported or otherwise identified discharges, 3) direct mitigation of identified illicit discharges, and 4) timely report to TCEQ both verbally and by fax any discharge found to pose risk to the public or the environment.

Measurable Goal: A listing of courses attended by EH&S MS4 field staff will be reported in the annual report for each calendar year. The number of field staff personnel trained each year will also be reported. This measure will be fully implemented with 2020 annual report. **Goal is to train a minimum of two field staff every two years by December 2020.**

- Illicit discharge reporting, response and enforcement

  Employee computer-based training and general public awareness pamphlets identify the non-compliance created by illicit discharges and provide for three different means to report suspected noncompliance, including a compliance helpline among the three. MS4 staff will immediately investigate all reports of illicit discharges to determine if noncompliance is evident and what the source of non-compliance is/was. University employees or students found responsible for intentional or negligent acts may be subjected to disciplinary actions in accordance with Handbook of Operating Procedures and Student Judicial Procedures to include termination and/or dismissal as a possible penalty for actions causing non-compliance. Contractors found responsible may be subject to financial penalty, cost of corrective actions and/or termination of contract depending on the severity of the non-compliance. Illicit discharges resulting from offsite activities will be reported to the City of El Paso MS4 for their action, and will be reported to TCEQ where actions are not sufficient to remedy the situation within 24 hours or if the situation creates a risk to the public or the environment.

  Implemented/Continuing Measurable Goal: The number of reported and investigated illicit discharges is reported in the annual report each year.

- Procedures for conducting inspections in response to complaints of illicit discharges.

  The campus consist nearly 90 buildings associated with the campus across 421 acres. Any reported discharges are immediately acted upon to resolve in concert with the local City storm water utility,

where necessary. Inspections are conducted both in immediate response within 24 hours to complaints, and where substantiated also to include follow-up inspections to assure corrective actions have been carried out.

Measurable Goal: The procedures for conducting investigated illicit discharges will be developed fully by December 2020.

3. Minimum Control Measure (MCM):

Construction Site Stormwater Runoff Control

The University currently uses a standardized specification (see attached) regarding SWPPP for construction sites. This document is consistent with the Erosion Sediment Control practices that follow such construction activities. Contractors must comply with these sections for erosion sediment control and to control construction site waste. Requirements in these spec sections require development, review to consider offsite water quality impacts, plan acceptance, and routine site inspections to ensure continuing compliance of the SWPPP program and control measures utilized. Construction sites will be inspected by EH&S personnel for compliance following any event where site runoff or soil migration onto the public way is observed by campus personnel or as follow-up to a report from the public. During such an inspection an assessment of soil and runoff containment practices, waste management practices, and compliance with the site plan will be rendered. Documents will also be reviewed to ensure continuity of compliance efforts. Members of the public who have comments regarding compliance at the construction sites may report issues to eh&s@utep.edu, phone the campus EH&S MS4 operator at (915) 747-7124, or use the Compliance Helpline (888) 228-7713. Contractors found noncompliant with the spec sections may be subject to the following sanctions: first violation - requirement for retraining, second violation - required replacement of the SWPPP administrator, and third violation - removal from the University bidders' list and violator will be reported to the local office of the TCEQ for further investigation of the offense(s). If the violator is a University employee the institution's reprimand policies will be used which may include suspension or termination for multiple offenses.

A. Best Management Practice (BMP):

- Require Erosion Sediment Control (ESC) plan for construction sites greater than 1 acre, with implementation of BMPs to control pollutants and uncontrolled run-off.

- Include ESC requirements in bid solicitations and contracts for construction activities.

- Perform pre-construction plan reviews followed by quality assurance inspections using MS4 personnel who by training are familiar with the BMPs used in General Permit TXR150000.

B. Minimum Measure Objective:

Use established set of minimum erosion and sediment control requirements in compliance with TPDES CGP TXR150000 for construction activities that disturb 1 acre or more of land or if the construction activity is part of a larger common plan of development that will disturb one acre or more. Requirements include planning, installation, inspection and maintenance of erosion and sediment control equipment.

C. Measurable Goals:

- Require Erosion Sediment Control (ESC) plan for areas of 1 acre or greater.

  Measurable Goal: Perform a minimum of one documented inspection for construction sites above 1 acre. Report number of construction site inspections in the annual report each year. This goal is implemented.

- Include ESC requirements in bid solicitation applications and contracts for contractors.

  Measurable Goal: Measurable Goal will be in full implementation with inclusion of the construction specification sections for all site developments of 1 acre or above, and the performance of site ESC plan reviews prior to work. Much of these practices are already in existence but the review of site ESC or SWPPP plans has not been fully implemented. This goal is implemented to align with start of required documented site inspections. Report number of construction sites of 1 acre or larger in the annual report each year. **No such sites are planned at present.**

- Perform pre-construction plan reviews followed by quality assurance inspections using MS4 personnel who by training are familiar with the BMPs used in Construction General Permit TXR150000.

  EH&S staff are trained to perform quality reviews and to provide comment for pre-construction storm water pollution prevention plans.

Measurable Goal: Train EH&S MS4 staff to perform reviews of pre-construction storm water pollution prevention plans and to perform site evaluations of BMPs used in Construction General Permit TXR150000. This goal is implemented. Report on number of personnel attending the SWPPP review training in the annual report. **Goal shall be to train a minimum of two personnel every other year by December 31st beginning 2021.**

4. **Minimum Control Measure (MCM):**
Post Construction Storm water Management in New Development and Redevelopment.

Controls must be established whenever activities will disrupt soils (uncover or destabilize) one acre or more area under a common plan of development. Developers or University personnel as the case may be shall submit an appropriate Notice of Intent with TCEQ and copy the EH&S department at the University. EH&S will then require that the development contractor and other involved personnel establish controls appropriate to the topography and soils affected.

Storm water runoff control from sites with new/re-development activities at sites of 1 acre or larger including with new/re-development activities at sites that are part of a larger common plan of development will be controlled through a program of applied storm runoff and erosion control measures implemented throughout the construction phase of the work and left in place during transition phases for redevelopment in accordance with campus plan of development. These controls will be inspected routinely following rain events of greater than 0.25 inches in a 24 hour day to ensure continuing functionality as a control measure. Related to this, rain gauge logging is performed by EH&S staff to document daily rain totals and may be viewed in the www.CoCoRaHS.org website as station number TX-EP-53. Until stabilized or one year, whichever is longer, the control measures at redevelopment sites will be inspected by EH&S MS4 personnel for compliance following any wind or rain event where site runoff or soil migration onto the public way is observed by campus personnel or as follow-up to a report from the public. During such an inspection an assessment of soil and runoff containment practices, waste management practices, and compliance with the site plan will be rendered. Any areas noted where controls have failed will be promptly remedied to reestablish control. Per MCM 3, contractors and developers may be progressively sanctioned where they repeatedly fail to control run-off through necessary repairs. The campus ultimate goal will be to re-establish native ground cover. All areas of redevelopment shall ultimately be re-established and stabilized at or above 75% of remaining surface area prior to issuance of NOT. Site visits by trained EH&S MS4 staff will verify this requirement is met.

Specific preapproved control measures which may be implemented as appropriate are published within the attached spec section.

A. Best Management Practice (BMP):

- Maintain all permanent Erosion Sediment Control (ESC) equipment.

- Stabilize all unpaved areas from construction activities of 1 acre or greater.

- Document inspection and corrective actions for developed areas post-development to assure continuing effectiveness of control measures and equipment established.

B. Minimum Measure Objective:

Ensure that all disturbed areas from construction activities, of 1 acre or greater are controlled to reduce runoff into storm water system.

C. Measurable Goals:

- Maintain all Permanent ESC Equipment.
  Measurable Goal partially implemented: All areas having permanent ESC equipment are to be inspected once a year after the control equipment has been installed. ESC locations will be added to inlet, outfall map(s). Work orders shall be generated where ESC equipment requires maintenance. Addition to maps shall occur as ESC equipment are added. **To date, none have been added as no new ESC equipment are installed.**

- Assure stabilization of areas post-construction. Stabilize all unpaved areas from construction activities of 1 acre or more, or areas of less than 1 acre that are part of a larger common plan of development.

  Measurable Goal implemented/continuing: Inspect all areas post construction of 1 acre or greater to verify that a density of 70% or more of native background from disturbed areas is re-established and stabilized prior to completion of project and issuance of NOT. Document stabilization inspections and report number in the annual report. **No such site exists or is planned at present. A schedule for implementation will apply to the next future construction site over 1 acre in size.**

- Document inspection and corrective actions for developed areas post-development to assure continuing effectiveness of control measures and equipment established.

Measurable Goal partially implemented: Document inventory and inspection of permanent controls and equipment. Track corrective actions found necessary through the scheduled inspections. Add permanent controls and equipment to map(s) to facilitate inspection tracking process. Addition to maps shall occur as Permanent Controls and Equipment are added. None have been added to date as no new Permanent Controls and Equipment are installed. **Expected first to be added in December 2019 with completion of major construction project, the IDRB. However project used hardscape without any needed Permanent Control Equipment. Next future site will potentially be subject to this measure.**

5. Minimum Control Measure (MCM):
Pollution Prevention and Good Housekeeping for Municipal Operations

A. Best Management Practices (BMP):

- Implement an operation and maintenance (O&M) program, including an employee training component, in place to reduce/prevent pollution from campus activities and campus owned areas included but not limited to park and open space maintenance; street and road maintenance; fleet and building maintenance; storm water system maintenance; new construction and land disturbances; campus parking lots; vehicle and equipment maintenance and storage yards; waste transfer stations; and salt/sand storage locations.

- Develop and maintain an inventory of the MS4's facilities and storm water control measures.

- Inform or train staff involved in good housekeeping practices.

- Waste from the MS4 is removed and properly disposed of in accordance with 30 TAC Chapters 330 or 335 as applicable.

- Contractors hired by the MS4 must be required to comply with operating procedures. MS4 develop contractor oversight procedures.

- MS4 evaluates O&M activities for their potential to discharge pollutants in storm water for road and parking lot maintenance, bridge maintenance, cold weather operations, and right-of-way maintenance etc. Identify pollutants of concern that could be discharged from the O&M activities. Develop and implement

pollution prevention measures that will reduce discharge of pollutants from O&M activities. Inspect pollution prevention measures at MS4 facilities.

- MS4 maintains structural controls.

B. Minimum Measure Objective: Expand Facilities Services operational & maintenance procedures to expand operations training to identify and maintain all structural controls, while also minimizing potential sources of storm water pollution. EH&S will add any identified or installed structural controls to its inlet and outfall map(s) in order to better track inspections and work order issuance regarding needed maintenance. Facilities Services shops (Grounds, Building Maintenance, Waste Management and Fleet Management) will assess their potential source operations and regularly secure and/or remove any items that can become pollution sources, floatables or potential storm water contaminants. All service contractors will be held to same protective requirements while working on the campus. In addition to prevention efforts to avoid pollution of the conveyances, the conveyances will periodically be cleared of debris, dredge spoils and floatables twice per year. This maintenance is to be scheduled associated with the scheduled outfall inspections in May/June and November/ December of each year. These dates are selected to best avoid disruption of classes and other campus activities. The dates may also be well coordinated to help engage the student volunteers anticipated as a result of MCM 1.

C. Measurable Goals

- Develop an operation & maintenance program to identify housekeeping measures and BMPs to reduce pollutants for Physical Plant crews, grounds crews, outdoor field laboratories, and fleet maintenance activities.

  Measurable Goal: Expand upon O&M guiding principles document to establish areas of concern for storm water protection, pollution prevention procedures and maintenance schedules specific to the pollution source. Add an inventory list of source concern areas and structural control areas to inspect and maintain. **Implement by Dec 31, 2021 and report annually thereafter.**

  Provide instruction to Facilities Services personnel, other affected campus operations personnel, contractors' personnel and fleet maintenance personnel on operation and maintenance activities regarding Storm water Management and Pollution Prevention Measures, and their roles in support of best prevention measures.

Distribute updated storm water pollution prevention pamphlets and posters in appropriate areas for employee education/ information. Provide updated training to all affected personnel on the site-specific pollution prevention in their work areas. Distribution of informational material has been ongoing and continues. **Implement site specific training update by Dec 31, 2021.**

Measurable Goal: Target date for specific pollution prevention awareness training shall be ongoing annually to keep awareness current and high among departments with highest potential to affect water conveyances. A mandatory contractor pollution prevention awareness training program will be presented for all new contractors controlling 1 acre or more of land area to reinforce established behaviors. Status of these initiatives and the number of awareness training events will be reported in the annual reports each calendar year beginning with the 2021 annual report. **Implement Contractor awareness training by Dec 31, 2021 and report number of Contractors trained each year thereafter.**

6. Minimum Control Measure (MCM):
Not Applicable

7. Minimum Control Measure (MCM):
Authorization for Construction Activities where the Small MS4 is the Site Operator

At the time of the Permit Application, UTEP does not elect to operate construction activities larger than 1 acre where UTEP is the site operator. UTEP does not foresee that it would engage in such activities directly with its own personnel. When areas affected by construction activities equal or exceed 1 acre in size, UTEP will outsource such activities and follow MCMs 3, 4 and 5 regarding those construction activities and the contracted services associated.

Should UTEP later reconsider and determine to become a construction site operator, it will submit a Notice of Change (NOC) to Permit #TXR040334.