THE UNIVERSITY OF TEXAS AT EL PASO

Stormwater Management Program (SWMP)

January 2025

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Description

This Stormwater Management Program (SWMP) is for a level 2b non-traditional small Municipal Separate Storm Sewer System (MS4) that is a state-owned and operated university campus. Approximately 1,000 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 no industrial sources present at the MS4. Therefore, Minimum Control Measures 1, 2, 3, 4, 5, and 6 are applicable as designated for a level 2b non-traditional small MS4.

1. Minimum Control Measure 1 (MCM1): *Public Education, Outreach and Involvement*

Outreach efforts under MCM 1 are directed toward the campus community, including students, staff, faculty, visitors, and contractors, through the public EH&S webpage and the visual educational messaging provided by storm drain and inlet identification. Outreach to businesses and industrial facilities is not applicable under MCM 1 because UTEP does not have such entities operating on the campus.

A. Best Management Practices (BMPs)

The Environmental Health and Safety (EH&S) department at UTEP will implement a public education and outreach program designed to inform students, employees, visitors, and contractors about the impacts of stormwater pollution, illicit discharges, and improper waste disposal. Public outreach will be accomplished through digital resources and visible messaging on stormwater infrastructure across campus. The EH&S will implement the following two BMPs under this MCM:

- **Information on the MS4 Operator's website.** The EH&S department will maintain a publicly accessible and regularly updated website containing the current SWMP, approved annual reports, educational information on stormwater pollution prevention and, resources that promote public involvement and transparency. The website serves as a continuous public education tool and will be updated throughout the permit term.
- **Maintain or mark storm drains and inlets with, "No Dumping - Drains to Creek" or a similar message.** EH&S will stick, maintain, and replace "NO DUMPING – DRAINS TO WATERWAY" decals on stormwater inlets throughout the campus. These visual decals reinforce public awareness regarding the direct connection between the storm drain system and the receiving waterbody.
- **Publish articles in local newspaper or newsletter, may be electronic.** UTEP will publish stormwater education content in campus publications such as *The Prospector, Minero*, or electronic newsletters distributed to students, faculty, and staff. Articles will contain

group-specific educational messages addressing pollutants of concern (e.g., vehicle fluids, chemicals, yard waste, trash, illicit discharges) and seasonally appropriate topics such as pre-monsoon awareness or Earth Week outreach. Articles will include EH&S contact information to facilitate reporting of stormwater concerns.

- **Social media posts/social media campaign.** EH&S will use UTEP-affiliated social media platforms (e.g., Instagram, Facebook, X) to distribute short public education messages regarding stormwater protection. Posts may include topics such as preventing illicit discharges, proper waste disposal, protecting the stream, and reporting stormwater concerns. Social media is an efficient tool for reaching large student populations and satisfies TXR040000 requirements for public outreach using electronic communication. EH&S will coordinate with University Communication to ensure that posts are distributed broadly and at seasonally appropriate times.

B. Minimum Measure Objective

The objective of MCM1 is to increase public awareness and encourage participation in protecting stormwater quality. EH&S will work to achieve this by:

- Providing continuous access to stormwater information through the public EH&S website.
- Maintaining visible storm drain decal that discourage illicit discharges.
- Publishing stormwater educational articles in campus communication media.
- Conducting social media campaigns that reach a broad segment of the campus population.
- Ensuring transparency and public access to SWMP documents and annual reports.

These activities aim to build an informed campus community that contributes to reducing pollutants in stormwater.

C. Measurable goals

- Information on the MS4 Operator's website.
    - Maintain an updated public-facing website containing the SWMP, annual reports, and stormwater educational materials at the EH&S website: https://www.utep.edu/ehs/programs/environmental-protection.html
    - Review and update the website at least once per year.
    - Document all updates and publications in the annual report.
- Maintain or mark storm drains and inlets with, "No Dumping - Drains to Creek" or a similar message.
    - Placard, stencil or paint a minimum of **10%** of all stormwater inlets each year within high-impact areas identified by EH&S or within impairment watersheds located inside the University boundary.
    - Once all known stormwater inlets have been marked, EH&S will inspect and maintain **at least 15%** of inlet markers annually.
    - Maintain documentation of the number of inlets inspected and the maintenance performed annually.
    - Add newly identified inlets to the storm drain inventory and include them in future marking and maintenance activities.

- Publish Articles in Campus Newspapers or Newsletters
    - Develop article topics that are **group-specific** (e.g., students, engineering programs, residential students) and address **pollutants of concern** at seasonally appropriate times.
    - Publish or electronically distribute **a minimum of two stormwater educational articles per year** through *The Prospector, Minero*, or campus newsletters.
    - Maintain copies or screenshots of publications and estimate audience reach for annual reporting.
- Social Media Posts / Social Media Campaign
    - Conduct at least **one social media stormwater education campaign annually**, consisting of multiple posts or messages distributed via UTEP affiliated platforms.
    - Ensure that posts reach a broad portion of the campus community (e.g., via main university channels or EH&S accounts).
    - Document the number of posts, distribution dates, and estimated reach in the annual report.

2. Minimum Control Measure 2 (MCM2): *Public Involvement/Participation*

The SWMP is for a level 2b 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 are under the direct management of the University through its employees or contracted personnel performing services for the direct benefit of the campus community.

The university also ensures that members of the public have clear and accessible communication channels to contact EH&S staff regarding stormwater concerns. Community members may report suspected illicit discharges or provide feedback on the SWMP through:

Email: ehs@utep.edu
EH&S MS4 staff Phone Line: (915) 747-7124
EH&S website: https://www.utep.edu/ehs/programs/environmental-protection.html
Compliance Helpline: (888) 228-7713

These communication avenues allow the campus community to contribute directly to stormwater efforts and program involvement.

A. Best Management Practices (BMPs)

- **Habitat improvement; tree planting; invasive vegetation removal; stream restoration.**
  EH&S will host or support an annual habitat improvement event designed to involve the campus community in environmental stewardship activities such as tree planting, removal of invasive vegetation, habitat enhancement or stream restoration. Events may take place in streams, green spaces, parks, or areas adjacent to public waterways. A single event may consist of multiple combined locations.
- **Educational display/booth at a school, public event, or similar event that provides information or displays that work to improve public understanding of issues related to water quality.**

EH&S will provide a staffed educational booth or display at least once per year during a public campus event, student fair, orientation activity or similar gathering. The booth will provide information about water quality, impacts of stormwater pollution, SWMP elements and responsibilities and, materials that strengthen public understanding of stormwater stewardship. Thus, BMP creates a direct, interactive opportunity for public engagement and education.

- **MS4 Area-Wide Stormwater Survey for Public Input**. UTEP will develop and distribute an annual stormwater survey to gather feedback from faculty, staff, and students whose activities, roles, or locations on campus have a direct relationship with or potential impact on stormwater infrastructure. The survey will solicit input on stormwater concerns, awareness levels, pollutant sources, and the effectiveness of existing MS4 program elements. Responses will be used to improve SWMP implementation and enhance public involvement.

B. Minimum Measure Objective

The objective of MCM 2 is to strengthen public participation and involvement in stormwater management by:

- Encouraging hands-on environmental stewardship activities.
- Providing opportunities for students and employees lo learn about and support stormwater protection.
- Maintaining clear channels for public feedback and reporting,
- Enhancing stormwater awareness through public-facing events, surveys, and communication tools.

The University aims to create a campus culture that actively supports environmental protection and stormwater quality improvement.

C. Measurable goals

- Habitat improvement; tree planting; invasive vegetation removal; stream restoration.
    - EH&S will host or support **at least one** habitat improvement event annually (required for Level 1 and 2 MS4s).
    - Ensure the event meets the minimum area requirement: **0.5 acres, or 25 yards** of stream or land area.
    - Acceptable activities include tree planting, invasive species removal, habitat restoration, or stream stabilization.
    - Report annually: type of event, location(s), estimated area improved, number of participants, environmental benefit achieved.
- Educational display/booth at a school, public event, or similar event that provides information or displays that work to improve public understanding of issues related to water quality.
    - Provide or support at least one staffed educational booth or display at a public campus event annually.
    - Track and report the event name and date, estimated audience reached, number of participants engaged, and educational materials distributed or displayed.
    - Summarize results and participation annually.
- MS4 Area Wide Stormwater Survey

- Develop and distribute **a minimum of one** stormwater public survey annually.
- Ensure the survey reaches **at least 75%** of the intended campus audience through mass email systems, campus announcements, or digital platforms.
- Develop and maintain a **tracking system** (e.g., distribution analytics, email metrics) to estimate the percentage of audience reached.
- Summarize survey results, participation metrics, and notable feedback in the annual report, including a description of how the input will be used to improve SWMP implementation.

3. Minimum Control Measure 3 (MCM3): *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 streams 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 team will 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 stream 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 stream 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 current and **accurate 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.
- **Public reporting of illicit discharges and spills**.
- **Develop and maintain procedures for responding to illicit discharges, illegal dumping and spills.**
- **Source investigation and elimination of illicit discharges and illegal dumping.**
- **Inspection Procedures**.

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 principal 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 MS4 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

- Establish and maintain a current and accurate Storm Drain Map with outfalls and inlets.
  A campus map has been developed in conjunction with Facilities Services to include the location of each outfall and storm sewer inlet on the campus. The numbers assigned on the map correspond to a unique inventory number for each location. Inspection results are documented through work orders that use the 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.
    - A Storm Drain 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 goal is to review and update, as necessary, at least once annually to include features which have been added, removed or changed.**
- 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 email of any discharge found to pose risk to the public or the environment.

- Conduct training for all the stormwater field staff conducted in person, on-line classes, or using self-paced training materials such as videos or reading materials. **The Goal is to train a minimum of one training annually for 100% of MS4 field staff that may encounter or otherwise observe an illicit discharge, illegal dumping, or illicit connection as part of normal job responsibilities. Maintain training records and include a summary in the annual report.**

- Public reporting of illicit discharges and spills.
  UTEP maintains at least one public reporting mechanism at all times. The MS4 helpline number and reporting process are published on the EH&S website and promoted at least twice per year. The EH&S department will be the central point to receive reports for illicit discharges and spills.
  - EH&S will maintain and publicize the reporting methodology used for reporting illicit discharges, illegal dumping, or other water quality impacts associated with discharges. **The goal is to maintain a minimum of one public reporting mechanism 100% of the time during the year. EH&S will publicize the MS4 helpline telephone number a minimum of two times annually through advertisements in the campus newspaper and on the MS4 EH&S website.**
- Develop and maintain procedures for responding to illicit discharges, illegal dumping, and spills.
  The campus consists of 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 ensure corrective actions have been carried out.
  - The procedures for responding to illicit discharges, illegal dumping, and spills are part of the Storm Water Management Plan. **The goal is to review and update the IDDE procedures at least one time annually to address changes and make improvements to the established procedures. Respond to all complains within one business hour of notification and conduct follow-up inspections for 100% of confirmed discharges.**
- Source investigation and elimination of illicit discharges and illegal dumping.
  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.

- Source investigation and elimination of illicit discharges and illegal dumping are carried out by MS4 trained staff. The goal is to **respond to 100% known illicit discharges and illegal dumping incidents on campus**. UTEP does not have any onsite sewage disposal systems with the boundaries of its MS4, however sanitary sewer discharges are considered high priority discharges. UTEP will **respond to 100% high priority discharges within 24 hours** by contacting The City of El Paso and El Paso Water Utilities for corrective action. UTEP will **respond to 100% known illicit discharges or illegal dumping incidents** where UTEP does not have jurisdiction by notifying the adjacent MS4 operators or the TCEQ Region 6 office throughout the permit year. UTEP will **notify TCEQ immediately of 100% of illicit flows** believed to be an immediate threat to human health or the environment throughout the permit year.

- Inspection Procedures. Inspections will be conducted at regular intervals by MS4 trained staff to include dry weather screening inspections, rainfall inspections, stormwater inlet inspections, inlet decal inspections and complaint report inspections. The MS4 trained staff will conduct follow-up inspections to ensure that corrective measures have been implemented by the party responsible. The inspections will follow an electronic inspection template format for the type of inspection and will be logged using the electronic online reporting system for stormwater inspections.
    - The goal is to **review and update the procedures at least one time annually** to address changes and make improvements to the established procedure found in the electronic repository.

4. Minimum Control Measure 4 (MCM4): *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 specification sections require development, review to consider offsite water quality impacts, plan acceptance, and routine site inspections to ensure continuing compliance with 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. Contractors found noncompliant with the specification 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 policies will be used which may include suspension or termination for multiple offenses.

A. Best Management Practices (BMPs)

- **Requirements and control measures for operators of small and large construction activities relating to stormwater management.**
- UTEP will require an **Erosion Sediment Control (ESC) plan for construction sites greater than 1 acre**, with implementation of BMPs to control pollutants and uncontrolled run-off.
- **Prohibitive discharges at construction sites in conjunction with TPDES CGP, TXR150000 permitted activities.**
- **Construction and site plan review for TPDES CGP, TXR150000 permitted activities.**
- **Construction Site Inspections and enforcement.**
- **Information submitted by the Public.**
- **MS4 Staff Training.**

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

- Requirements and control measures for operators of small and large construction activities relating to stormwater management.
    - UTEP will require operators of small and large construction activities to select, install, implement, and maintain stormwater control measures that prevent illicit discharges to the MEP as outlined in its construction documents and instructions to bidders**. The goal is to review and update the instructions to bidders at least one time during the permit term to address changes and make improvements to the instruction to bidders where applicable.**
- UTEP will prohibit discharges at construction sites in conjunction with TPDES CGP, TXR150000 permitted activities.
    - UTEP will prohibit wastewater discharges from washout of concrete and water well drilling operations, unless managed by an appropriate control; wastewater from washout and cleanout of stucco, paint, from release oils, and other construction materials; Fuels, oils or other pollutants used in vehicle equipment operation and maintenance; Soaps or solvents used in vehicle and equipment washing; and Discharges from dewatering activities, including discharges from dewatering of trenches and excavations, unless managed by appropriate BMPs. **The goal is to develop and maintain a policy for prohibitive discharges at construction sites in compliance with TPDES CGP TXR150000 for construction activities that disturb 1 acre or more of land.**

- Construction and site plan review for TPDES CGP, TXR150000 permitted activities.
    - UTEP will perform a site plan review for all permitted stormwater pollution prevention plans (SWP3) that will be developed for submission with TPDES CGP, TXR150000. UTEP will 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. **The goal is to implement site plan review procedures for 100% of new construction site plans received each year and to review and update site plan review procedures at least once annually to address changes and make improvements to the established procedures where applicable.**
- Implementation of procedures of construction site inspections Construction site inspections and enforcement.
    - UTEP will inspect large and small construction sites that have appropriate coverage under the TPDES CGP, TXR 150000. Inspections will evaluate threats to water quality such as: soil erosion potential; site slope; project size and type; sensitivity of receiving water bodies; proximity to receiving water bodies; non-stormwater discharges; and past record of compliance by the operators of the construction site. Inspections will be written and will determine if control measures have been selected, installed, implemented and maintained. **The goal is to review and update inspection procedures at least annually to address changes and make improvements to the established procedures; to conduct inspections at a minimum of 80% of active construction sites annually; and to follow up inspections in 100% of cases where necessary.**
- Information submitted by the Public.
    - 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. **The goal is to review and update procedures for the receipt and consideration of information submitted by the public at least one time annually to address changes and make improvements to the established procedures. EH&S will maintain a webpage and provide a telephone number on its MS4 website for receipt of information submitted by the public throughout the permit term.**
- MS4 Staff Training.
    - MS4 inspection staff will be trained and knowledgeable in stormwater construction activities. The training for MS4 staff will be conducted by qualified MS4 staff and outside trainers. Trained MS4 staff will perform reviews of pre-construction storm water pollution prevention plans and perform site evaluations of BMPs used in Construction General Permit TXR150000. **The goal is to conduct a minimum of one training course annually for 100% of MS4 staff whose primary job duties are related to implementing the construction stormwater program.**

5. Minimum Control Measure 5 (MCM5): *Post Construction Stormwater Management in a New Development and Redevelopment.*

Controls must be established whenever activities disrupt soils (uncover or destabilize) one acre or more area under a common plan of development. Developers or University personnel 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.

Stormwater 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 MCM3, contractors and developers may be progressively sanctioned where they repeatedly fail to control run-off through necessary repairs. The goal will be to re-establish native ground cover. All areas of redevelopment shall ultimately be re-established and stabilize 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.

A. Best Management Practices (BMPs)

- **Post-construction policy for runoff from new development and redevelopment projects.**
- **Document and maintain records of enforcement actions.**
- **Long term operation and maintenance of structural control measures installed.**

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 BMPs as part of post-construction activities.
    - Post-construction policy for operators of new development sites will design, install, implement, and maintain a combination of structural and non-structural BMPs that

protect water quality. The goal is to **review and update the policy at least one time during the permit term** to address changes and make improvements to the policy where applicable.

- Document and maintain records of enforcement actions.
    - UTEP will document and maintain written records of enforcement actions when deficiencies are noted during inspections of post-construction BMPs. The goal is to **maintain a record of 100% of enforcement actions taken each year** and make **100% of enforcement records available to TCEQ for review within 24 hours of request.**
- Long term maintenance of post-construction stormwater control measures.
    - UTEP will perform maintenance of post-construction stormwater controls measures in conjunction with Municipal Operation and Maintenance Activities listed under Section 6; Pollution Prevention and Good Housekeeping for Municipal Operations. **The goal is to implement a yearly maintenance plan and schedule addressing 100% of stormwater control measures added by construction projects. Require 100% of operators develop and implement a maintenance plan addressing maintenance requirement for any structural control measures installed through a construction project, and to maintain documentation of 100% of maintenance performed. Make everything available for review to TCEQ within 24 hours of the request.**

6. Minimum Control Measure 6 (MCM6): *Pollution Prevention and Good Housekeeping for Municipal Operation*

As a level 2b non-traditional small MS4, the University of Texas at El Paso (UTEP) implements pollution prevention and good housekeeping practices to reduce stormwater pollution from municipal operations. These practices apply to all UTEP-owned facilities, operational areas, maintenance activities, and contractors performing work on campus.

A. Best Management Practices (BMPs)

- UTEP facilities and control inventory.
- Training and education.
- Disposal of waste material.
- Contractor requirements and oversight.
- Assessment of UTEP owned operations.
- Identification of pollutants of concern.
- Pollution prevention measures.
- Inspection of pollution prevention measures.
- Structural control maintenance.

B. Minimum Measure Objective

Expand Facilities Services operational & maintenance procedures and training to identify and maintain all structural controls, while also minimizing potential sources of stormwater pollution. EH&S will add

any identified or installed structural controls to its inlet and outfall map(s) 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.

C. Measurable goals

- UTEP facilities and control inventory.
    - UTEP will develop and maintain an inventory of MS4's facilities and stormwater control measures to include applicable permit numbers, registration numbers, and authorizations for each facility or controls. The inventory will be made available to TCEQ upon request. The goal is to develop and maintain an annual inventory for **100% of UTEP owned and operated facilities and controls**; and to **update the inventory at least one time annually** to address changes or addition to the facilities and controls where applicable.
- Training and education.
    - 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. Provide updated training to all affected personnel on site-specific pollution prevention. The goal is to **conduct a minimum of one training course annually for 100% of employees involved in implementing pollution prevention and good housekeeping practices**.
- Disposal of waste material.
    - UTEP will remove and properly dispose of waste in accordance with 30 TAC Chapters 330 or 335 as applicable. The goal is to ensure that **100% of waste from the MS4 site is disposed of in accordance with TAC Chapters 330 or 335**, as applicable each year.
- Contractor requirements and oversight.
    - Contractors hired by UTEP to perform maintenance activities will be contractually required to comply with all the stormwater control measures, good housekeeping practices, and facility-specific stormwater management operating procedures. The goal is to ensure that **100% of contractors** hired to perform maintenance activities are **contractually required to comply with all stormwater control measures, good housekeeping practices and facility-specific stormwater management**. **Implement oversight procedures of contractor activities in 100% of contracts** to ensure that contractors are using appropriate controls measures and SOPs each year, and **oversight**

procedures are maintained on-site 100% of the time and made available for review by TCEQ within 24 hours of request.

- Assessment of UTEP owned operations.
    - 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, stormwater 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. The goal is to **evaluate 100% of O&M activities, in conjunction with procedure reviews if appropriate, for their potential to discharge pollutants in stormwater annually** including road and parking lot maintenance, cold weather operations, and right-of-way maintenance.
- Identification of pollutants of concern.
    - UTEP will evaluate 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. The goal is to **identify pollutants of concern that could be discharged from all O&M activities that are part of the assessment of UTEP owned operations and maintain a list of 100% of the pollutants identified.**
- Pollution prevention measures.
    - Develop and implement a set of pollution prevention measures that will reduce the discharge of pollutants in stormwater from UTEP owned operations. The goal is to **track 100% of the application of deicing and anti-icing compounds in storage areas and record the amount of compound used for each application annually**; and **place barriers around or keep runoff away from 100% of deicing chemical storage areas to prevent discharge into surface waters each year.**
- Inspection of pollution prevention measures.
    - UTEP will visually inspect all pollution prevention measures that are implemented on-site to ensure they are working properly. The goal is to **visually inspect 100% of pollution prevention measures at least one time annually**. **Develop and maintain written procedures that describe the frequency of inspections and how they will be conducted**. **Review and update the inspection procedures at least one time annually**, and **maintain a log of 100% of the inspections conducted annually and make the log available for review by TCEQ within 24 hours of a request.**
- Structural control maintenance.
    - If BMPs include structural controls, maintenance of the controls will be performed by UTEP and consistent with maintaining the effectiveness of the BMP. UTEP will develop written procedures that define the frequency of inspections occurring at least annually.

The goal is to **at least one time annually, perform maintenance of 100% of the structural controls, which require maintenance**. Maintenance will follow a plan and schedule developed by UTEP and is to be consistent with maintaining the effectiveness of the BMP. UTEP will **develop and maintain written procedures that define the frequency of inspections and how they will be conducted**; and **review and update the maintenance procedures at least one time annually** to address changes or additions to the pollution prevention measures.

7. Minimum Control Measure 7 (MCM7): *Industrial Stormwater Sources – Not Applicable*

8. Minimum Control Measure 8 (MCM8): *Authorization for Construction Activities where the Small MS4 is 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, UTEP will submit a Notice of Change (NOC) to the executive director by identifying the geographical area or boundary where the activities will be conducted und the provisions of TXR040000.

Appendix I

Summary of Changes and/or Review

Original version: January 1, 2025

Second version: January 26, 2026

Updated BMPs and Measurable Goals for MCM 1 (Public Education, Outreach and Involvement) and MCM2 (Public Involvement/Participation).