THE UNIVERSITY OF NEW MEXICO

Annual Stormwater Report

December 2025| MS4 Permit # NMR04A000

EHS setting up a table for UNM's Welcome Back Days. We talked to over 100 staff, students, and community members about Pollution Prevention and Stormwater.

Presented To:

EPA

Prepared By:

ENVIRONMENTAL HEALTH & SAFETY

EXECUTIVE SUMMARY

of UNM's Annual Stormwater Report

The University of New Mexico's (UNM) Environmental Health and Safety (EHS) department prepared this MS4 Annual Report (Report). This Report supports the requirements of the United States Environmental Protection Agency's (EPA) National Pollutant Discharge Elimination System (NPDES) program. Specifically, the Report is published to comply with the Middle Rio Grande (MRG) Watershed Based Municipal Separate Stormwater Sewer System Permit (MS4 Permit).[1] The Permit requires UNM to implement a program to reduce pollutants in stormwater runoff to the maximum extent practicable.

EHS administers the MS4 Program on behalf of UNM, and it consists of six Minimum Control Measures (MCMs) to comply with the provisions of the MS4 Permit:

- MCM 1 – Public Education and Outreach
- MCM 2 – Public Participation
- MCM 3 – Pollution Prevention (P2) & Good Housekeeping
- MCM 4 – Illicit Discharge Detection and Elimination (IDDE)
- MCM 5 – Management of Construction Site Runoff
- MCM 6 – Management of Post-Construction Site Runoff

Each MCM above is addressed in detail in this Report. Additionally, this Report summarizes the changes, updates, progress, and limitations of the MS4 Program for Reporting Year 2025 (RY25), or July 1, 2024 – June 30, 2025. Likewise, it addresses UNM's water quality priorities, long-term stormwater management measures, program resources, and program evaluation efforts.

UNM's Stormwater Impact

UNM is a public research university located in central Albuquerque, New Mexico, serving a faculty, staff, and student population of 33,000. The main campus is approximately 600 acres, split into three parts – North, Central, and South. Central Campus sits between Central Avenue on the south, Girard Boulevard on the east, Lomas Boulevard on the north, and University Boulevard on the west. It is home to the primary academic operations of the university. North Campus, which includes the medical and law schools, is located on the north side of Lomas Boulevard across from Central Campus. South Campus is a mile south of Central Campus, centered around University Boulevard and Avenida César Chavez. It primarily houses athletic facilities and UNM's Science and Technology Park.

UNM's MS4 serves all three campuses, which contain numerous buildings and facilities with large areas of impervious surfaces where various operations occur that have stormwater implications. The UNM MS4 system drains stormwater to the west toward the Rio Grande, but before discharging to the river, UNM's storm sewer connects to two other permit-regulated municipalities:

- The City of Albuquerque (COA), and
- The Albuquerque Metropolitan Arroyo Flood Control Authority (AMAFCA).

How the General Public & UNM's Community Can Get Involved

If you have questions, would like more information, or wish to provide public comments, contact EHS (EHSWEB-L@list.unm.edu) and review UNM's stormwater website (goto.unm.edu/sw).

[1] MS4 Permit # NMR04A000

Enclosures:

On the following six pages, the completed MS4 Annual Report Format is attached. These six pages serve as UNM's official annual report. All other information contained within this document is for supplementary purposes only.

NPDES Stormwater Program: MS4 Annual Report Format

National Pollutant Discharge Elimination System (NPDES)

Check box if you are submitting an individual Annual Report with one or more cooperative program elements. ☒

Check box if you are submitting an individual Annual Report with individual program elements only. ☐

Check box if this is a new name, address, etc. ☐

1. MS4(s)

THE UNIVERSITY OF NEW MEXICO
Name of MS4

Casey | Hall | Director, EHS
Name of Contact Person (First) (Last) (Title)

505-277-2753 | cbhall4@unm.edu
Telephone (including area code) E-mail

1801 Tucker St NE
Mailing Address

Albuquerque | NM | 87131
City State ZIP code

What size population does your MS4(s) serve? 33,000 NPDES number

What is the reporting period for this report? (mm/dd/yyyy) From Jul 1, 2024 to Jun 30, 2025

2. Water Quality Priorities

A. Does your MS4(s) discharge to waters listed as impaired on a state 303(d) list? ☒ Yes ☐ No

B. If yes, identify each impaired water, the impairment, whether a TMDL has been approved by EPA for each, and whether the TMDL assigns a wasteload allocation to your MS4(s). Use a new line for each impairment, and attach additional pages as necessary.

Impaired Water	Impairment	Approved TMDL		TMDL assigns WLA to MS4	
AMAFCA (NDC) to Rio Grande	NM 2105_50	☒ Yes	☐ No	☒ Yes	☐ No
AMAFCA (SDC) to Rio Grande	NM 2105_50	☒ Yes	☐ No	☒ Yes	☐ No
		☐ Yes	☐ No	☐ Yes	☐ No
		☐ Yes	☐ No	☐ Yes	☐ No

2. B. Continued

Impairment		Approved TMDL		TMDL assigns WLA to MS4	
		☐ Yes	☐ No	☐ Yes	☐ No
		☐ Yes	☐ No	☐ Yes	☐ No
		☐ Yes	☐ No	☐ Yes	☐ No
		☐ Yes	☐ No	☐ Yes	☐ No

C. What specific sources contributing to the impairment(s) are you targeting in your stormwater program?

Trash, debris, sediment, pet waste (E. coli), hazardous chemicals, waste from birds (E. coli), fats, oils, nutrients

D. Do you discharge to any high-quality waters (e.g., Tier 2, Tier 3, outstanding natural resource waters, or other state or federal designation)? ☐ Yes ☒ No

E. Are you implementing additional specific provisions to ensure their continued integrity? ☐ Yes ☒ No

3. Public Education and Public Participation

A. Is your public education program targeting specific pollutants and sources of those pollutants? ☒ Yes ☐ No

B. If yes, what are the specific sources and/or pollutants addressed by your public education program?

Trash, debris, animal waste, fats, oils, grease, sediment, hazardous chemicals

C. Note specific successful outcome(s) (e.g., quantified reduction in fertilizer use; NOT tasks, events, publications) fully or partially attributable to your public education program during this reporting period.

Educated 12,626 staff about illicit discharge via *Basic Annual Safety Training* and 7 staff about permit rules via a *SW Mgmt.* course; Educated 802 folks about pollution via in-person events.

D. Do you have an advisory committee or other body comprised of the public and other stakeholders that provides regular input on your stormwater program? ☐ Yes ☒ No

4. Construction

A. Do you have an ordinance or other regulatory mechanism stipulating:

Erosion and sediment control requirements?	☒ Yes	☐ No
Other construction waste control requirements?	☒ Yes	☐ No
Requirement to submit construction plans for review?	☒ Yes	☐ No
MS4 enforcement authority?	☒ Yes	☐ No

B. Do you have written procedures for:

Reviewing construction plans?	☒ Yes	☐ No
Performing inspections?	☒ Yes	☐ No
Responding to violations?	☒ Yes	☐ No

C. Identify the number of active construction sites ≥ 1 acre in operation in your jurisdiction at any time during the reporting period. 7

D. How many of the sites identified in 4.C did you inspect during this reporting period? 7

E. Describe, on average, the frequency with which your program conducts construction site inspections.

UNM EHS (i.e., the owner) inspects sites once per month and more often, when public complaints are reported. The construction site operator inspects every two weeks or after significant rain events.

F. Do you prioritize certain construction sites for more frequent inspections? ☒ Yes ☐ No

If Yes, based on what criteria? Sites with significant violations are promptly re-inspected to ensure corrective actions are implemented.

G. Identify which of the following types of enforcement actions you used during the reporting period for construction activities, indicate the number of actions, or note those for which you do not have authority:

☒ Yes	Notice of violation	0	No Authority	☐
☐ Yes	Administrative fines		No Authority	☒
☒ Yes	Stop Work Orders		No Authority	☐
☐ Yes	Civil penalties		No Authority	☒
☐ Yes	Criminal actions		No Authority	☒
☐ Yes	Administrative orders		No Authority	☒
☐ Yes	Other			

H. Do you use an electronic tool (e.g., GIS, data base, spreadsheet) to track the locations, inspection results, and enforcement actions of active construction sites in your jurisdiction? ☒ Yes ☐ No

I. What are the 3 most common types of violations documented during this reporting period?

Construction track out, concrete washout on the ground, & inadequate housekeeping.

J. How often do municipal employees receive training on the construction program? Annually

5. Illicit Discharge Elimination

A. Have you completed a map of all outfalls and receiving waters of your storm sewer system? ☒ Yes ☐ No

B. Have you completed a map of all storm drain pipes and other conveyances in the storm sewer system? ☒ Yes ☐ No

C. Identify the number of outfalls in your storm sewer system. 0

D. Do you have documented procedures, including frequency, for screening outfalls? ☒ Yes ☐ No

E. Of the outfalls identified in 5.C, how many were screened for dry weather discharges during this reporting period?

0

F. Of the outfalls identified in 5.C, how many have been screened for dry weather discharges at any time since you obtained MS4 permit coverage? 0

G. What is your frequency for screening outfalls for illicit discharges? Describe any variation based on size/type.

UNM does not have outfalls (as defined in Part VII of the permit). However, UNM has identified significant discharge points flowing into major drainage channels (owned by other MS4s) & screens those per the IDDE Plan's schedule.

H. Do you have an ordinance or other regulatory mechanism that effectively prohibits illicit discharges? ☒ Yes ☐ No

I. Do you have an ordinance or other regulatory mechanism that provides authority for you to take enforcement action and/or recover costs for addressing illicit discharges? ☒ Yes ☐ No

J. During this reporting period, how many illicit discharges/illegal connections have you discovered? 3

K. Of those illicit discharges/illegal connections that have been discovered or reported, how many have been eliminated? 3

L. How often do municipal employees receive training on the illicit discharge program? Annually

6. Stormwater Management for Municipal Operations

A. Have stormwater pollution prevention plans (or an equivalent plan) been developed for:

All public parks, ball fields, other recreational facilities and other open spaces	☒ Yes	☐ No
All municipal construction activities, including those disturbing less than 1 acre	☒ Yes	☐ No
All municipal turf grass/landscape management activities	☒ Yes	☐ No
All municipal vehicle fueling, operation and maintenance activities	☒ Yes	☐ No
All municipal maintenance yards	☒ Yes	☐ No
All municipal waste handling and disposal areas	☒ Yes	☐ No

Other

B. Are stormwater inspections conducted at these facilities? ☒ Yes ☐ No

C. If Yes, at what frequency are inspections conducted? Annually

D. List activities for which operating procedures or management practices specific to stormwater management have been developed (e.g., road repairs, catch basin cleaning).

Management practices are in place for construction activities, post-construction design and planning, illicit discharge, street sweeping, trash pickup, and infrastructure maintenance.

E. Do you prioritize certain municipal activities and/or facilities for more frequent inspection? ☒ Yes ☐ No

F. If Yes, which activities and/or facilities receive most frequent inspections?

Facilities cited with NOVs for illicit discharge or other permit requirements are promptly re-inspected to ensure corrective actions are implemented.

G. Do all municipal employees and contractors overseeing planning and implementation of stormwater-related activities receive comprehensive training on stormwater management? ☒ Yes ☐ No

H. If yes, do you also provide regular updates and refreshers? ☒ Yes ☐ No

I. If so, how frequently and/or under what circumstances?

New staff in planning, design, and construction receive on-boarding training, and again annually. Updates are also provided as new info arises. Refresher courses are mandated for recurring violators.

7. Long-term (Post-Construction) Stormwater Measures

A. Do you have an ordinance or other regulatory mechanism to require:

Site plan reviews for stormwater/water quality of all new and re-development projects?	☒ Yes	☐ No
Long-term operation and maintenance of stormwater management controls?	☒ Yes	☐ No
Retrofitting to incorporate long-term stormwater management controls?	☒ Yes	☐ No

B. If you have retrofit requirements, what are the circumstances/criteria?

Retrofitting requirements are limited to redevelopment ≥ 1 acre, which requires managing 80th percentile storm volumes. Voluntary retrofitting efforts are also under way across campus to treat runoff.

C What are your criteria for determining which new/re-development stormwater plans you will review (e.g., all projects, projects disturbing greater than one acre, etc.)?

All new and redevelopment projects that disturb ≥ 1 acre or projects disturbing < 1acre but part of a common plan that is ≥ 1 acre. Some additional voluntary reviews are provided for sites not meeting those criteria.

D. Do you require water quality or quantity design standards or performance standards, either directly or by reference to a state or other standard, be met for new development and re-development? ☒ Yes ☐ No

E. Do these performance or design standards require that pre-development hydrology be met for:

Flow volumes	☒ Yes	☐ No
Peak discharge rates	☒ Yes	☐ No
Discharge frequency	☐ Yes	☒ No
Flow duration	☐ Yes	☒ No

F. Please provide the URL/reference where all post-construction stormwater management standards can be found.

https://ehs.unm.edu/ehs-standards-and-

G. How many development and redevelopment project plans were reviewed during the reporting period to assess impacts to water quality and receiving stream protection? 3

H. How many of the plans identified in 7.G were approved? 3

I. How many privately owned permanent stormwater management practices/facilities were inspected during the reporting period? 0

J. How many of the practices/facilities identified in I were found to have inadequate maintenance? N/A

K. How long do you give operators to remedy any operation and maintenance deficiencies identified during inspections? Depends on severity.

L. Do you have authority to take enforcement action for failure to properly operate and maintain stormwater practices/facilities? ☐ Yes ☒ No

M. How many formal enforcement actions (i.e., more than a verbal or written warning) were taken for failure to adequately operate and/or maintain stormwater management practices? 0

N. Do you use an electronic tool (e.g., GIS, database, spreadsheet) to track post-construction BMPs, inspections and maintenance? ☒ Yes ☐ No

O. Do all municipal departments and/or staff (as relevant) have access to this tracking system? ☐ Yes ☒ No

P. How often do municipal employees receive training on the post-construction program? Annually

8. Program Resources

A. What was the annual expenditure to implement MS4 permit requirements this reporting period? 150,000

B. What is next year's budget for implementing the requirements of your MS4 NPDES permit? 150,000

C. This year what is/are your source(s) of funding for the stormwater program, and annual revenue (amount or percentage) derived from each?

Source:	Institutional and General funds	Amount $		OR	100
Source:		Amount $		OR	
Source:		Amount $		OR	

D. How many FTEs does your municipality devote to the stormwater program (specifically for implementing the stormwater program; not municipal employees with other primary responsibilities)? 1 FTE

E. Do you share program implementation responsibilities with any other entities? ☒ Yes ☐ No

Entity	Activity/Task/Responsibility	Your Oversight/Accountability Mechanism
TAG (Tech. Advis	cooperative compliance monitoring	Intergovernmental Agreement

9. Evaluating/Measuring Progress

A. What indicators do you use to evaluate the overall effectiveness of your stormwater management program, how long have you been tracking them, and at what frequency? These are not measurable goals for individual management practices or tasks, but large-scale or long-term metrics for the overall program, such as macroinvertebrate community indices, measures of effective impervious cover in the watershed, indicators of in-stream hydrologic stability, etc.

Indicator	Began Tracking (year)	Frequency	Number of Location
Volume of recycling & waste diversion	2012	Annually	N/A
# of community members engaged	2012	Semi-Annually	N/A
# of IDDE inspections w. NOVs	2018	Annually	Variable
% of P2 Inspections w. NOVs	2021	Annually	Variable
% of construction sites inspected	2021	Annually	Variable

B. What environmental quality trends have you documented over the duration of your stormwater program? Reports or summaries can be attached electronically, or provide the URL to where they may be found on the Web.

See report Middle Rio Grande E. Coli Analysis and Research: http://www.amafca.org/documents/2015_Annual_Report/AMAFCA%202015%20%28Jan%20to%20June%29%20Annual%20Report%20II.A%20-%20VI.pdf

10. Additional

Please attach any additional information on the performance of your MS4 program, including information required in Parts I.C, I.D, and III.B. If providing clarification to any of the questions above, please provide the question number (e.g., 2C) in your response.

Certification Statement and Signature

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

☒ Yes ☐ No

Federal regulations require this application to be signed as follows: **For a municipal, State, Federal, or other public facility**: by either a principal executive or ranking elected official.

Signature | Teresa Costantinidis, Executive Vice President | Name of Certifying Official, Title | Date (mm/dd/yyyy)

OVERVIEW: SWMP IMPLEMENTATION

Key Term(s):

- ***SWMP - Stormwater Management Plan:*** A plan outlining how UNM works to achieve the best stormwater management practices, available at https://ehs.unm.edu/assets/documents/misc-environmental-health/UNM_SWMP.pdf

Below, MCM Tables 1 – 6 display permit requirements, proposed plans and goals, and the current status for implementing all six MCMs outlined in the permit. In other words, these tables communicate how UNM's SWMP complied with the permit requirements by implementing plans with measurable goals. Then, the status column shows if and how UNM achieved each goal for the previous reporting year period.

MCM Table 1 – Public Education & Outreach

Requirement	Plan	Goal	Status
1.1. Develop, revise, implement, and maintain an education and outreach program as required in Part I.D.5.g.(i) and Part I.D.5.g.(ii): (i) The permittee shall, individually or cooperatively, develop, revise, implement, and maintain a comprehensive stormwater program to educate the community, employees, businesses, and the general public of hazards associated with the illegal discharges and improper disposal of waste and about the impact that stormwater discharges on local waterways, as well as the steps that the public can take to reduce pollutants in stormwater. Permittees previously covered under NMS000101 and NMR040000 must continue existing programs while updating those programs, as necessary, to comply with the requirements of this permit.	UNM will provide public education and outreach regarding stormwater impacts on the Middle Rio Grande watershed.	To provide educational opportunities (e.g., literature, training, media campaigns) for the entire UNM community to learn about mitigating pollution.	EHS developed a written Education and Outreach (E&O) program, as incorporated into the SWMP. In total, EHS provided E&O directly to 802 and indirectly to >12,003 community members in RY25 through various efforts as explained below. EHS participated in UNM's "Welcome Back Days" event at the beginning of each academic semester and handed out fliers with stormwater education literature. In total, approximately 134 (+3% YOY) community members engaged with the material. EHS hosted E&O events called "EHS Roadshows," where academic departments (e.g., Chemistry) are targeted to provide pollution prevention literature among other topics. In total, approximately 110 (62% YOY) community members engaged with the material.

(ii) The permittee must implement a public education program to distribute educational knowledge to the community or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff. The permittee must: (a) Define the goals and objectives of the program based on high-priority community-wide issues; (b) Develop or utilize appropriate educational materials, such as printed materials, billboard and mass transit advertisements, signage at select locations, radio advertisements, television advertisements, and websites; (c) Inform individuals and households about ensuring proper septic system maintenance, ensuring the proper use and disposal of landscape and garden chemicals, including fertilizers and pesticides, protecting and restoring riparian vegetation, and properly disposing of used motor oil or household hazardous wastes; (d) Inform individuals and groups how to become involved in local stream and beach restoration activities as well as activities that are coordinated by youth service and conservation corps or other citizen groups;			EHS tabled at the UNM Sustainability Fair engaging 222 (-16% YOY) community members about stormwater pollution. EHS participated in UNM's Safety Week. During this multi day event EHS for the first time provided pollution prevention and stormwater literature among other topics. EHS engaged with 306 (-37% YOY) students and community members. EHS participated in UNM's Compliance week. During the event EHS discussed stormwater and pollution prevention with 30 Staff, student, faculty, and community members. EHS included stormwater education in its *Basic Annual Safety Training*. 12,626 faculty, staff, and students completed BAST in RY25~~3.~~ UNM's indirect E&O efforts also included: (1) Posting general information on the UNM stormwater website. The stormwater webpage receives ~ 27 views a month. (2) Publishing information in UNM's newspaper, *The Daily Lobo*; and (3) Providing training to UNM staff. This information included: (1) How to review and provide feedback on UNM's Annual Report; (2) The proper handling, disposal, and recycling of: a. Used motor vehicle fluids, b. Household and industrial hazardous wastes, c. Organic waste, d. Recyclable waste, and

(e) Use tailored public education programs, using a mix of locally appropriate strategies, to target specific audiences and communities. Examples of strategies include distributing brochures or fact sheets, sponsoring speaking engagements before community groups, providing public service announcements, implementing educational programs targeted at school-age children, and conducting community-based projects such as storm drain stenciling, and watershed cleanups; and (f) Use materials or outreach programs directed toward targeted groups of commercial, industrial, and institutional entities likely to have significant stormwater impacts. For example, providing information to restaurants on the impact of grease clogging storm drains and to garages on the impact of oil discharges. The permittee may tailor the outreach program to address the viewpoints and concerns of all communities, particularly minority and disadvantaged communities, as well as any special concerns relating to children. The permittee must make information available for non-English speaking residents, where appropriate.			e. Car wash water; (3) The proper use and handling of fertilizers, pesticides, and herbicides; and/or (4) The procedures to report illicit discharges and improper disposals. EHS aired public radio station announcements in July on KUNM (89.9 FM) with the following message: "Support comes from the U-N-M Department of Environmental Health & Safety, reminding New Mexico that picking up after pets is a simple way to help keep the Rio Grande clean during monsoon season." According to their most recent annual report, KUNM has ~91,750 listeners/week across NM, and assuming 10% of listeners heard the ad, EHS reached 9,175 EHS distributed 2,500 FOG flyers (Figure 3) for incoming freshmen moving into the dorms. The flyer informed residents how to dispose of FOG properly. EHS educated facility owners and operators on their responsibility to control pollutants from their facility to the MS4. EHS continues to collaborate with UNM's Facilities Design & Construction (FDC) to install and maintain storm drain placards on inlets across UNM's Albuquerque Campuses with the message "No Dumping, only Rain in the Drain."

1.2. Enhance the program to include requirements in Part I.D.5.g.(v) through Part I.D.5.g.(viii): (v) Where necessary, to comply with the Minimum Control Measures established in Part I.D.5.g.(i) and Part I.D.5.g.(ii), the permittee should develop a program or modify/revise an existing education and outreach program to: (a) Promote, publicize, and facilitate the use of Green Infrastructure (GI)/Low Impact Development (LID)/Sustainability practices; and (b) Include an integrated public education program (including all permittee departments and programs within the MS4) regarding litter reduction, reduction in pesticide/herbicide use, recycling, and proper disposal (including yard waste, hazardous waste materials, and used motor vehicle fluids), and GI/LID/Sustainable practices (including xeriscaping, reduced water consumption, water harvesting practices allowed by the New Mexico State Engineer Office). (vi) The permittee may collaborate or partner with other MS4 operators to maximize the program and cost-effectiveness of the required outreach. (vii) The education and outreach program may use citizen hotlines as a low-cost strategy to engage the public in illicit discharge surveillance.	UNM will engage its community about Green Stormwater Infrastructure (GSI), illicit discharge reporting, and Fats, Oils, & Grease (FOG) best practices.	To promote GSI awareness and development on campus. To inform the community about how and when to report illicit discharges. To inform food handling employees and residential hall inhabitants about reducing FOG discharges to wastewater and storm sewers.	EHS provided and maintained two primary reporting methods for illicit discharge: (1) The **Accident, Incident & Spill Reporting** form is available 24/7 to report spills at goto.unm.edu/spill; and (2) A 24/7 Duty Officer is available to respond to reports of illicit discharges by calling (505) 951-0794. EHS informed UNM employees and students about these two methods in various training courses and E&O events. EHS continued to distribute educational poster for UNM's Food Service Establishment (FSE) sinks. The poster's contents inform employees and students about how to dispose of FOG, the consequences of failing to do so, and how to report illicit discharges. EHS also made the FOG poster available in Spanish and was provided to each food service establishment. EHS distributed 2,500 FOG flyers for incoming freshmen moving into the dorms. The flyer (Figure 3) informed residents how to dispose of FOG properly.

(viii) The permittee may use stormwater educational materials provided by the State, Tribe, EPA, environmental, public interest or trade organizations, or other MS4s. The permittee may also integrate the education and outreach program with existing education and outreach programs in the Middle Rio Grande area. Examples of existing programs include: (a) Classroom education on stormwater; A. Develop a watershed map to help students visualize the area impacted. B. Develop pet-specific education (b) Establish a water committee/advisor group; (c) Contribute and participate in Stormwater Quality Team; (d) Education/outreach for commercial activities; (e) Hold regular employee training with industry groups (f) Education of lawn and garden activities; (g) Education on sustainable practices; (h) Education/outreach of pet waste management; (i) Education on the proper disposal of household hazardous waste; (j) Education/outreach programs aimed at minority and disadvantaged communities and children; (k) Education/outreach of trash management; (l) Education/outreach in public events;			

A. Participate in local events—brochures, posters, etc. B. Participate in regional events (i.e., State Fair, Balloon Fiesta). (m) Education/outreach using the media (e.g., publish local newsletters); (n) Education/outreach on water conservation practices designed to reduce pollutants in stormwater for home residences.			
1.3. Describe other proposed activities to address the Public Education and Outreach on Stormwater Impacts Measure:	N/A	N/A	N/A

MCM Table 2 – Public Participation

Requirement	Plan	Goal	Status
2.1. Develop (or update), implement, and maintain a public involvement and participation plan as required in Part I.D.5.h.(ii) and Part I.D.5.h.(iii): (ii) The permittee shall develop, revise, implement and maintain a plan to encourage public involvement and provide opportunities for participation in the review, modification, and implementation of the SWMP; develop and implement a process by which public comments on the plan are received and reviewed by the person(s) responsible for the SWMP; and, make the SWMP available to the public and to the operator of any MS4 or Tribal authority receiving discharges from the MS4. Permittees previously covered under NMS000101 or NMR040000 must continue existing public involvement and participation programs while updating those programs, as necessary, to comply with the requirements of this permit. (iii) The plan required in Part I.D.5.h.(ii) shall include a comprehensive planning process that involves public participation and, where necessary intergovernmental	UNM will continue to welcome public participation in its SWMP. EHS will involve academic and non-academic departments (e.g., Facilities Management, Planning, Design & Construction; Architecture [academic]; and Geography & Environmental Studies [academic]) as stakeholders in the development and revision of UNM's SWMP. UNM will participate in local public forums where active public involvement occurs (e.g., Technical Advisory Group) on stormwater issues. EHS will train and update other	To provide the community with the means to participate in the development, implementation, and revision of the SWMP.	UNM requested public participation and feedback on its SWMP and all Annual Reports. These are posted on the EHS website, and a participation narrative with a link is advertised in the *Daily Lobo* newspaper. For example, Annual Reports are advertised for public comment in the newspaper with the following language: "**AS LOCAL STORM SEWERS** collect rainfall and snowmelt, the water that runs off can carry contaminants to the Rio Grande. However, UNM remains committed to sustainably protecting the natural environment. To learn how UNM protects the river, review the Annual Stormwater Report at goto.unm.edu/stormwater. UNM requests and encourages public comments on this report before December 1st, which can be emailed to EHSweb-L@list.UNM.edu." Likewise, EHS posted 20 notices (i.e., posters; see **Error! Reference source not found.**) soliciting feedback on the Annual Report at various locations around campus. Posters included similar language to the ad and included a link and a QR code for accessing the report. EHS solicited comments from academic and non-academic departments regarding the Annual Report. EHS attended and participated in all Technical Advisory Group meetings this Reporting Year. Members regularly include: - City of Albuquerque - AMAFCA (Albuquerque Metropolitan Arroyo Flood Control Authority) - NM DOT (New Mexico Dept. of Transportation District 3) - Bernalillo County - Sandoval County - Village of Corrales

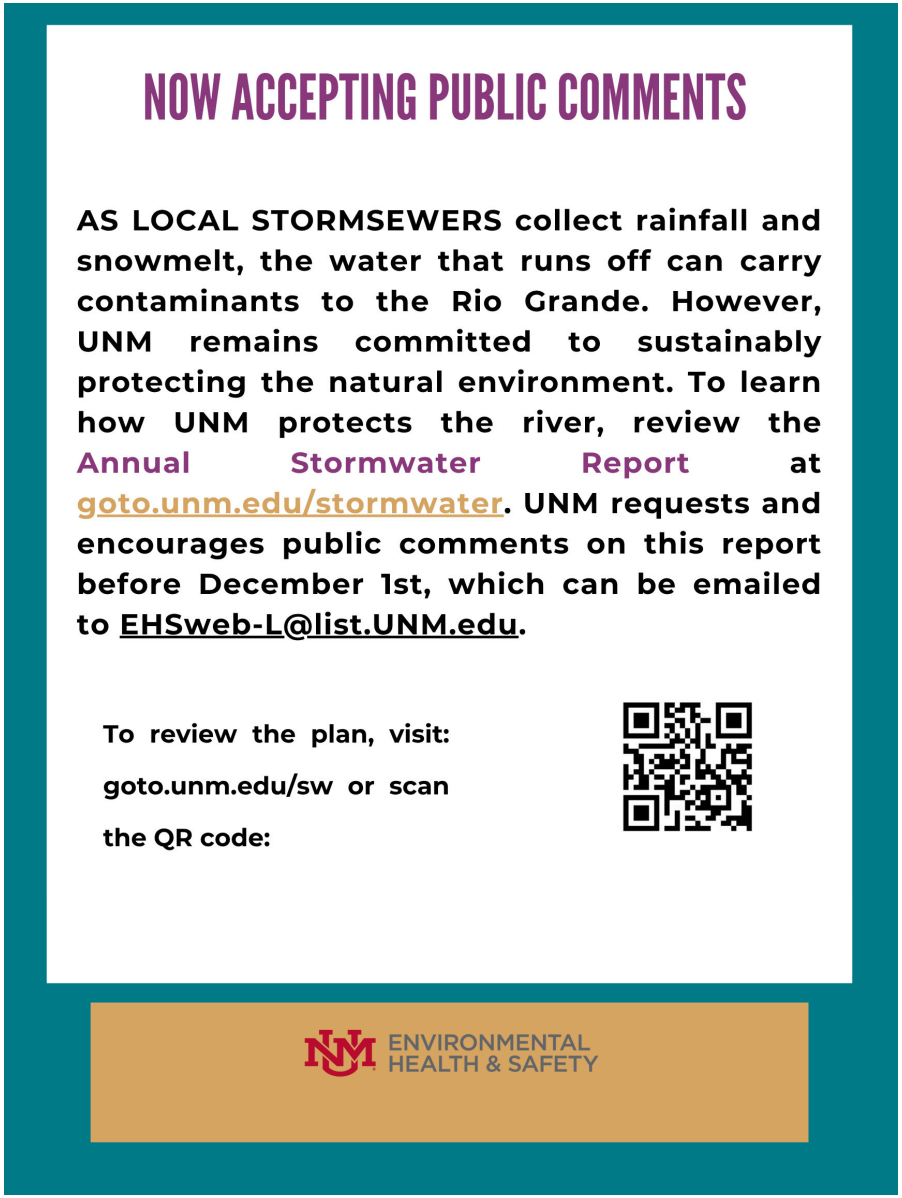
coordination to reduce the discharge of pollutants to the maximum extent practicable using management practices, control techniques, and system, design and engineering methods, and such other provisions which are appropriate. The permittee must include the following elements in the plan: (a) A detailed description of the general plan for informing the public of involvement and participation opportunities, including types of activities; target audiences; how interested parties may access the SWMP; and how the public was involved in the development of the SWMP; (b) The development and implementation of at least one (1) assessment of public behavioral change following a public education and/or participation event; (c) A process to solicit involvement by environmental groups, environmental justice communities, civic organizations, or other neighborhoods/organizations interested in water quality-related issues, including but not limited to the Middle Rio Grande Water Quality Work Group, the Middle Rio Grande Bosque Initiative, the Middle Rio Grande Endangered Species Act Collaborative Program, the Middle	departments about stormwater issues and solicits input and participation.		- City of Rio Rancho - Los Ranchos de Albuquerque - KAFB (Kirtland Air Force Base) - Town of Bernalillo - EXPO (State Fairgrounds/Expo NM) - SSCAFCA (Southern Sandoval County Arroyo Flood Control Authority) - ESCAFCA (Eastern Sandoval County Arroyo Flood Control Authority) - Sandia Laboratories, Department of Energy (DOE) - Pueblo of Sandia - Pueblo of Isleta - Pueblo of Santa Ana

Rio Grande-Albuquerque Reach Watershed Group, the Pueblos of Santa Ana, Sandia and Isleta, Albuquerque Bernalillo County Water Utility Authority, UNM Colleges, and Schools, and Chartered Student Organizations; and (d) An evaluation of opportunities to utilize volunteers for stormwater pollution prevention activities and awareness throughout the area.			
2.2. Describe the plan to comply with State, Tribal, and local notice requirements when implementing a Public Involvement and Participation Program as required in Part I.D.5.h.(iv): (iv) The permittee shall comply with State, Tribal, and local public notice requirements when implementing a public involvement/ participation program.	UNM will provide public notice of its plan to submit an NOI (Notice Of Intent) and SWMP to the EPA.	To comply with State, Tribal, and local notice requirements.	UNM provided public notice of its plan to submit an NOI and SWMP to the EPA. The notice was published in the Albuquerque Journal. The draft NOI and SWMP were published on the EHS website, with copies available at the Zimmerman Library. The public was allowed 30 days to submit written comments.
2.3. Describe a plan to include elements as required in Part I.D.5.h.(v): (v) The public participation process must reach out to all economic and ethnic groups. Opportunities for members of the public to participate in program development and implementation include serving as	UNM will serve on the Technical Advisory Group (TAG) and participate in voluntary monitoring.	To encourage participation in program development and implementation.	EHS attended and participated in Technical Advisory Group meetings. EHS participated in the voluntary monitoring efforts led by AMAFCA and COA. Details are appended to this report.

citizen representatives on a local stormwater management panel, attending public hearings, working as citizen volunteers to educate other individuals about the program, assisting in program coordination with other pre-existing programs, or participating in volunteer monitoring efforts.			
2.4. As required in Part I.D.5.h.(viii), provide the internet site (or website) where the SWMP document, Annual Reports, and other documents will be available to the public: (viii) The permittee must provide public accessibility of the Stormwater Management Program (SWMP) document and Annual Reports online via the Internet and during normal business hours at the MS4 operator's main office, a local library, posting on the internet, and/or other readily accessible location for public inspection and copying consistent with any applicable federal, state, tribal, or local open records requirements. Upon a showing of significant public interest, the MS4 operator is encouraged to hold a public meeting (or include it in the agenda of a regularly scheduled city council meeting, etc.) on the NOI, SWMP, and Annual Reports. (See Part III B)	EHS will publish UNM's SWMP and Annual Reports on its website and provide a forum.	To seek and address input from the public.	UNM requested public participation and feedback on its SWMP and all Annual Reports.

2.5. Enhance the program to include requirements in Part I.D.5.h.(ix): (ix) The permittee may integrate the public Involvement and participation program with existing education and outreach programs in the Middle Rio Grande area. Examples of existing programs include Adopt-A-Stream Programs; Attitude Surveys; Community Hotlines (e.g., the establishment of a "311"-type number and system established to handle storm-water-related concerns, setting up a public tracking/reporting system, using phones and social media); Revegetation Programs; Storm Drain Stenciling Programs; Stream cleanup and Monitoring program/events.	UNM will integrate public education and outreach efforts with public involvement and participation efforts.	To provide a cohesive outreach and participation campaign that informs the community about stormwater issues and reporting procedures.	EHS established and maintained campaigns and reporting infrastructure to facilitate maximum public education and involvement.
2.6. Describe other proposed activities to address the Public Involvement and Participation Measure:	N/A	N/A	N/A

Figure 1- Public Feedback Poster for the RY25 Annual Report



MCM Table 3 – Pollution Prevention (P2) & Good Housekeeping

Requirement	Plan	Goal	Status
3.1. Develop or update the Pollution Prevention/Good House Keeping program to include the elements in Part I.D.5.c.(i): (i) The permittee must develop, revise and implement an operation and maintenance program that includes a training component and the ultimate goal of preventing or reducing pollutant runoff from municipal operations. Permittees previously covered under NMS000101 or NMR040000 must continue existing programs while updating those programs, as necessary, to comply with the requirements of this permit. The program must include: (a) Development and implementation of an employee training program to incorporate pollution prevention and good housekeeping techniques into everyday operations and maintenance activities. The employee training program must be designed to prevent and reduce stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance. The permittee must also develop a tracking procedure and ensure that employee	UNM will implement, review and enhance pollution prevention practices. When possible, UNM will implement new source control procedures to limit the discharge of pollutants from the MS4. As required, UNM's Facilities Management Department will implement: a) Stormwater Operations & Maintenance (O&M) Program b) grounds and landscaping maintenance; c) road and parking lot operation and maintenance; d) fleet and building maintenance; e) new construction and	To train employees about pollution prevention, response, and reporting procedures relating to operations and maintenance of stormwater infrastructure.	Online Stormwater Management training was provided to UNM's Facilities Management Department during the reporting period. This reporting year involved significantly more effort towards in-person trainings and E&O. Nevertheless, the following courses were offered with the following satisfactory completion statistics: ○ Stormwater Management: 6 (-40% YOY); ○ Hazardous Waste Management: 67 (-59% YOY); ○ Wastewater Management: 8 (+14% YOY); & ○ Lab Safety Series 1, 2, & 3: 58 people (+87% YOY). EHS maintained and enforced its *Stormwater Guidance for UNM Staff and Contractors*. The goal of this document is to inform persons in charge of new and redevelopment projects on campus about stormwater rules and ways to comply with the EPA's *2022 Construction General Permit* and *MRG MS4 Permit*. EHS trained 7 (+250% YOY) persons in charge of new and redevelopment projects on campus about pre and post-construction requirements regarding stormwater rules. EHS redrafted, published, and implemented UNM's SPCC as required every five years per 40 CFR 112. Likewise, EHS developed enhanced tools and procured additional support equipment for preventing, controlling, and counter-measuring oil spills. UNM has prepared a written Stormwater Operation and Maintenance manual that includes the required elements listed. UNM's Facilities Management Department implemented: a) Stormwater Operations & Maintenance (O&M) Program

turnover is considered when determining the frequency of training; (b) Maintenance activities, maintenance schedules, and long-term inspection procedures for structural and non-structural stormwater controls to reduce floatable, trash, and other pollutants discharged from the MS4. (c) Controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, fleet or maintenance shops with outdoor storage areas, salt/sand storage locations, snow disposal areas operated by the permittee, and waste transfer stations; (d) Procedures for properly disposing of waste removed from the separate storm sewers and areas listed in Part I.D.5.c.(i).(c) (such as dredge spoil, accumulated sediments, floatables, and other debris); and (e) Procedures to ensure that new flood management projects assess the impacts on water quality and examine existing projects for incorporating additional water quality protection devices or practices. Note: The permittee may use training materials that are available from EPA, NMED, Tribe, or other organizations.	land disturbance training; f) utility systems maintenance; & g) MS4 system maintenance. The UNM O&M program will include training for appropriate UNM staff on improving stormwater quality. UNM's Facilities Management Department's O&M Program maintains: a) An updated list of stormwater quality facilities by drainage basin, including location and description; b) A target number of 20 stormwater quality facilities will be inspected once every three months by UNM's Facilities Management Department and cleaned if necessary; and		b) Grounds and landscaping maintenance; c) Road and parking lot operation and maintenance; d) Fleet and building maintenance; e) New construction and land disturbance training; f) Utility systems maintenance; & g) MS4 system maintenance.

	c) A leading source control program of the street and hard-scaping sweep and daily (M-F) litter pickup on campus. EHS maintains UNM's Spill Prevention, Countermeasure, and Control (SPCC) Plan to address the risks from oil tanks greater than or equal to 55 gallons. UNM takes measures to ensure that parties responsible for a spill on campus take reasonable steps to control and minimize threats to human health and the environment. Potential discharges will be controlled through the implementation of spill prevention practices, self-inspections, and employee training.		

	UNM's Facilities Management Department's O&M Program will also include measures to control the following stormwater pollutants: a) De-icing salts; b) Roadway debris and roadside vegetation management practices; leaked automotive fluids in equipment maintenance yards; c) Debris on hard-scaping (roads, etc.) that can be reduced by modifying street sweeping strategies; and d) Targeting problem areas on campus that may have greater pollution potential.		
3.2. Enhance the program to include the elements in Part I.D.5.c.(ii):	UNM will:	Submit annual progress	

(ii) The Pollution Prevention/Good Housekeeping program must include the following elements: (a) Develop or update the existing list of all stormwater quality facilities by drainage basin, including location and description; (b) Develop or modify existing operational manual for de-icing activities addressing alternate materials and methods to control impacts on stormwater quality; (c) Develop or modify an existing program to control pollution in stormwater runoff from equipment and vehicle maintenance yards and maintenance center operations located within the MS4; (d) Develop or modify the existing street sweeping program. Assess possible benefits from changing the frequency or timing of sweeping activities or utilizing different equipment for sweeping activities; (e) A description of procedures used by permittees to target roadway areas most likely to contribute pollutants to and from the MS4 (i.e., runoff discharges directly to sensitive receiving water, roadway receives a majority of de-icing material, roadway receives excess litter, roadway	Implement the O&M program to support waste disposal standard operating procedures (SOPs), including for motor vehicle fluids, toxic paints, solvents, fertilizers, pesticides, herbicides, and any other hazardous material, by June 2017. This will include a list of opportunities for recycling substances. Also, SOPs will address the removal of sediments, debris, floatables, and litter, including pet wastes. By June 20, 2017, re-assess existing flood control infrastructure for the potential to retro-fit it with additional water quality enhancement features. Note: UNM's O&M Program maintains:	updates in the Annual Report.	UNM's Facilities Management Department continued routine O&M operations for street sweeping, trash collections, and recycling. Hazardous chemicals and used oils from maintenance shops were disposed of through EHS or other third-party vendors. With the exception of a few small detention basins, UNM does not have flood control infrastructure. The flood control infrastructure is owned and operated by AMAFCA. No retrofit evaluations were conducted during this reporting period.

receives greater loads of oil and grease); (f) Develop or revise existing standard operating procedures for the collection of used motor vehicle fluids (at a minimum oil and antifreeze) and toxics (including paint, solvents, fertilizers, pesticides, herbicides, and other hazardous materials) used in permittee operations or discarded in the MS4, for recycle, reuse, or proper disposal; (g) Develop or revise existing standard operating procedures for the disposal of accumulated sediments, floatables, and other debris collected from the MS4 and during permittee operations to ensure proper disposal; (h) Develop or revised existing litter source control programs to include public awareness campaigns targeting the permittee audience; and (i) Develop or review and revise, as necessary, the criteria, procedures, and schedule to evaluate existing flood control devices, structures, and drainage ways to assess the potential of retrofitting to provide additional pollutant removal from stormwater. Implement routine reviews to ensure new and/or innovative practices are implemented where applicable.	a) an updated list of stormwater quality facilities by drainage basin, including location and description; and b) a target number of 20 stormwater quality facilities shall be inspected once every three months by UNM's Facilities Management Department and cleaned if necessary.		

(j) Enhance inspection and maintenance programs by coordinating with maintenance personnel to ensure that a target number of structures per basin are inspected and maintained per quarter; (k) Enhance the existing program to control the discharge of floatables and trash from the MS4 by implementing source control of floatables in industrial and commercial areas; (l) Include in each annual report a cumulative summary of retrofit evaluations conducted during the permit term on existing flood control devices, structures, and drainage ways to benefit water quality. Update the SWMP to include a schedule (with priorities) for identified retrofit projects; (m) Flood management projects: review and revise, as necessary, technical criteria guidance documents and program for the assessment of water quality impacts and incorporation of water quality controls into future flood control projects. The criteria guidance document must include the following elements: A. Describe how new flood control projects are assessed for water quality impacts. B. Provide citations and descriptions of design			

standards that ensure water quality controls are incorporated in future flood control projects. C. Include methods for permittees to update standards with new and/or innovative practices. D. Describe master planning and project planning procedures and design review procedures. (n) Develop procedures to control the discharge of pollutants related to the storage and application of pesticides, herbicides, and fertilizers applied, by the permittee's employees or contractors, to public right-of-ways, parks, and other municipal property. The permittee must provide an updated description of the data monitoring system for all permittee departments utilizing pesticides, herbicides, and fertilizers.			
3.3. Develop or update a list and a map of industrial facilities owned or operated by the permittee as required in Part I.D.5.c.(iii): (iii) Comply with the requirements included in the EPA Multi-Sector General Permit (MSGP) to control runoff from industrial facilities (as	UNM does not have operations within the campus jurisdiction that would normally be categorized as industrial.	N/A	N/A

defined in 40 CFR 122.26(b)(14)(i)-(ix) and (xi)) owned or operated by the permittees and ultimately discharge to the MS4. The permittees must develop or update: (a) A list of municipal/permittee operations impacted by this program, (b) A map showing the industrial facilities owned and operated by the MS4, (c) A list of the industrial facilities (other than large construction activities defined as industrial activity) that will be included in the industrial runoff control program by category and by basin. The list must include the permit authorization number or an MSGP NOI ID for each facility, as applicable.			
3.4. Describe other proposed activities to address Pollution Prevention/Good Housekeeping for Municipal/permittee Operations Measure:	UNM will continue to explore additional activities to address the Pollution Prevention/Good Housekeeping requirements for municipal operations.	Additional proposed activities will be reported in the annual report.	In RY22, EHS completed a GIS inventory of all storm drains on campus and replaced all missing/damaged “no dumping” plaques. No changes were necessary in RY24. EHS performed 43 (0% YOY) pollution prevention inspections across campus. In RY25, EHS continued its Pollution Prevention (P2) program, tailoring inspections to 17 different facility operations. Previously, inspectors utilized a generic inspection checklist, which did not review specific guidelines for different operations. The new checklists are designed using agency (e.g., EPA, ABCWUA) fact sheets and regulations to improve program efficacy. Now, each operation type has specific inspection

			criteria to identify hazards and reduce pollution. For example, the new checklists reflect the following 17 facility operations: 1. Automotive 2. Business 3. Chemical 4. Dental 5. General (non-specific) 6. Groundskeeping & Pest Control 7. Material & Equip. Storage 8. Medical (non-Dental) 9. Metal Works 10. Painting & Coating 11. Print & Copy 12. Research Laboratory (non-Chem; non-Med.) 13. Restaurant (FOG) 14. Restaurant (non-FOG) 15. Solid Waste & Recycling 16. Utilities 17. Water Use & Conservation EHS continues expanding the scope to reach beyond just stormwater quality issues. Using the precautionary principle throughout various processes to minimize pollution to the environment, including the hydrosphere, atmosphere, lithosphere, and biosphere. A logic model of the revised program is shown in Figure 2 below, detailing the P2 program's new scope of work. EHS continued distributing educational posters, including a Spanish version, to Food Service Establishment (FSE) kitchen sinks. The poster's contents inform employees and students about how to dispose of FOG, the consequences of failing to do so, and how to report illicit discharges. Clearly, the MS4 Permit is exclusively concerned with storm sewers, but sanitary sewer overflows can occur. Therefore, EHS continued distributing educational signage (see Figures 4 & 5) to post above laboratory sinks to reduce illicit discharges

			to sanitary sewers. Likewise, the materials reduce the potential to introduce POTW pass-throughs, which are also regulated under the NPDES program.

Figure 2 - A Logic Model for the Revised P2 Program.

UNM Pollution Prevention (P2) Program: A Logic Model

Intervening with the precautionary principal to minimize pollution.

ENVIRONMENTAL HEALTH & SAFETY

Inputs	Output Activities	Output Audience	Short-Term Outcomes	Med-Term Outcomes	Long-Term Outcomes
What EHS invests. →	*What EHS does.* →	*Who EHS reaches.* →	*Quantitative/Measurable results.* →		*Narrative results.*
◔ Time ◴ $ Money $ ▸ Expertise ◂	1. Inspect Facilities to minimize pollution risks. 2. Design training for P2 (general & sector-based). 3. Provide preventative training annually. 4. Provide remedial training for P2 violators.	1. Facilities Managers 2. Grounds/Landscaping Staff 3. Restaurant Staff 4. Automotive Staff 5. Waste Mgmt. Staff 6. Research Staff A. Arch./Eng./Plan. B. Labs	↗ Training ↗ Awareness ↘ Ignorance ↘ Illicit behavior	↗ BMPs ↗ Use of green products ↗ IPM use ↗ Enhanced O&M ↗ Eco-consciousness ↘ IDDE: ↘ Soil Erosion ↘ F.O.G. ↘ Petroleum ↘ Floatables ↘ Chemicals	**Enhance the quality of the:** • Atmosphere (air); • Hydrosphere (water); • Lithosphere (soil); & • Biosphere (life), ✓ Human & ✓ Non-human. **Achieve Compliance with:** • ABC AQB Title V Permit • SDWA (42 USC 300f) • NMED GWB MOU • P2 Act (42 USC 133) • PST Rule (20.5 NMAC) • SPCC Plan (40 CFR 112) • MS4 Permit • CGP Permit • ABCWUA MOU

Assumptions:

1. The P2 program focuses on preventing pollution sources that impacts air, water, soil, or life through inspection, education, & training.
2. Changes will be outlined in a new P2 SOP (expected FY23).
3. Implementing preventative & remedial training will reduce adverse behaviors.

External Factors:

1. Internal/External Policies
2. Internal/External Agencies/Departments

Program Evaluation:

Identify Metrics → Collect Data → Analyze → Synthesize & Report → Intervene → Restart

Key:

↗ = Increase; ↘ = Decrease

Figure 3 – FOG 3 for UNM Student Residents

Figure 4 - No Chemicals Down the Drain Stickers.

Figure 5 - Hazardous Waste Poster

<table>
<tr><th>Requirement</th><th>Plan</th><th>Goal</th><th>Status</th></tr>
<tr>
<td>3.1.2. Describe the plan to estimate the annual volume of floatables and trash removed from each control facility and characterize the floatable type as required in Part I.D.5.f.(i)(b):

(b) Estimate the annual volume of floatables and trash removed from each control facility and characterize the floatable type.</td>
<td>UNM does not own or operate any major stormwater quality control facilities. UNM’s Facilities Management Department recycling will continue to track and report the estimated volume of trash and recyclable materials collected from campus.

UNM carefully collects and disposes of all wastes that could be hazardous to stormwater quality. For instance, the EHS Department picks up and properly disposes of UNM’s hazardous wastes in compliance with RCRA requirements. EHS, UNM’s Facilities Management Department, and other UNM departments properly manage and dispose of regulated universal wastes and other special wastes. UNM policy UBPP 7780 forbids automotive maintenance activities on campus outside of the fleet and equipment maintenance operations at the UNM’s Facilities Management Department Automotive Center. UNM is expanding its waste collection program to include fats, oils, and greases. UNM continues to coordinate waste collection efforts amongst departments.</td>
<td>The progress and estimated volume of trash and recyclable materials will be reported in the annual report.</td>
<td>Hazardous waste disposed of by EHS in CY24:
• 14.11 tons (+6% YOY)

Non-hazardous waste disposed of by EHS in CY24:
• 2.59 tons (-63% YOY)

Otherwise, the FDC department manages and records municipal solid waste and reports data to the New Mexico Environment Department (NMED) on a Calendar Year (CY) basis. Therefore, the data below match that format. CY25 totals are not yet available. However, CY24 totals equaled 452.09 tons of recycled material and 897.71 tons of landfilled waste. These totals are broken down below:

<table>
<tr><th>Annual Report
MSW - NMED</th><th>2024</th></tr>
<tr><td>Landfilled - UNM</td><td>897.71</td></tr>
<tr><td>Brush/Green Waste</td><td>82.74</td></tr>
<tr><td>Scrap Tires</td><td>0.00</td></tr>
<tr><td>Motor Oil</td><td>0.00</td></tr>
<tr><td>Antifreeze</td><td>0.00</td></tr>
</table>
</td>
</tr>
</table>

			Lead Acid Batteries: 0.00
			Other Co-mingled: 0.00
			Recyclables - NMED: 2024
			Mixed Paper: 77.96
			Cardboard: 150.36
			Newspaper: 0.44
			Office Paper: 48.04
			PET#1: 2.35
			Aluminum: 1.67
			Glass: 1.27
			Scrap Metal: 31.05
			White Goods: 17.52
			Pallets: 4.80
			Food Waste: 116.32
			Brush/Green Waste: 0.00
			Other Co-mingled - NMED: 2024
			Mixed plastic: 2.07
			Fluorescent bulbs: 4.53
			Toners: 0.03
			Batteries, rechargeable: 0.58
			Batteries, alkaline: 5.10
			Text books: 0.00

3.1.3. Describe other proposed activities to address the Control of Floatables Discharges Measure:	No additional activities are being proposed at this time. UNM will continue to explore additional activities to address the Control of Floatables Discharges Measure.	N/A	N/A

Control of Floatables Discharges

Requirement	Plan	Goal	Status
3.1.1. Develop a schedule to implement the program as required in Part I.D.5.f.(i)(a): (i) The permittee must develop, update, and implement a program to address and control floatables in discharges into the MS4. The floatables control program shall include source controls and, where necessary, structural controls. Permittees previously covered under NMS000101 or NMR040000 must continue existing programs while updating those programs, as necessary, to comply with the requirements of this permit. The following elements must be included in the program: (a) Develop a schedule for implementation of the program to control floatables in discharges into the MS4 (Note: AMAFCA and the City of Albuquerque should update the schedule according to the findings of the 2005 AMAFCA/COA Floatable and Gross Pollutant Study and other studies).	UNM's approach is to control floatables at the source. UNM has a robust trash collection system, with a dense network of trash collection stations across campus. UNM may have the most intensive litter removal and street and sidewalk sweeping program in the Albuquerque metro area that removes floatables from the campus grounds before they can come into contact with stormwater. These activities will remain continuous. Furthermore, UNM will install and maintain grates in stormwater inlets across campus to control floatables discharge. The UNM Facilities Management department will continue to track and report the estimated volume of floatables and trash removed from our control facilities. Beginning in June 2017, UNM's Facilities Management Department will start characterizing the types of floatables removed from control facilities.	To implement a schedule for implementation of controls of floatables in discharges into the MS4 Include a discussion of the volume and type of trash removed in Annual Reports.	UNM Grounds and Landscaping personnel continued implementing quarterly maintenance and operations on stormwater inlets that trap floatables and other debris. UNM's Facilities Design & Construction Department has identified a list of storm drain inlets that are cleaned at least quarterly. UNM's Facilities Design & Construction Department performs street sweeping every day, and each UNM street is swept on average twice a week. The frequency of sweeping reduces in the winter months. The amount of debris collected from street sweeping for CY24 is 126 cubic yards. Note: these totals are included in the totals for Landfilled Municipal

			Solid Waste, listed in the “Waste Collection Programs” table above.

UNM Storm Drain Inlets Inspected & Maintained for Proper Operation at least Quarterly

Inlet #	Location:
1.	West of Centennial Engineering (Bldg.122) in the roadway along the West Curb line
2.	West of Hibben Center (Bldg. 15) in the bump out on the West side of the road (2 inlets)
3.	North of Zimmerman (Bldg. 53) in the parking lot
4.	Walkway east of Zimmerman (Bldg. 53) and East of Collage of Education (Bldg. 57)
5.	SE of Hokona Zia (Bldg. 58) in Redondo Way
6.	NE of Simpson Hall (Bldg. 66) in Redondo Way
7.	South of Santa Clara (Bldg. 61) in Redondo Way
8.	North of SRC Commons (Bldg. 88)
9.	NE of Mesa Vista (Bldg. 56) at Area 3
10.	South side of Duck Pond
11.	SE side of Scholes Hall (Bldg. 10)
12.	SW of Chapel (Bldg. 25)
13.	East of Bandelier Hall East (Bldg. 8) at Rose Garden
14.	North side of EECE (Bldg. 46) in the south end of the parking lot
15.	NW of Ford Utilities (Bldg. 116) in the parking lot
16.	SW corner of Novitski Hall (Bldg. 249) in SW corner of the south parking lot
17.	Southside of HSSB (Bldg. 266) in the walkway
18.	NW of HSSB (Bldg. 266) in the lawn area
19.	NW of Novitski Hall (Bldg. 249) in the SE corner of the north parking lot (2 inlets)
20.	NW of Observatory (Bldg. 208) in the NW corner of the parking lot.

Source: UNM Facilities Management, Grounds & Landscaping. 2012.

MCM Table 4 – Illicit Discharge Detection & Elimination (IDDE)

Requirement	Plan	Goal	Status
4.1. Mapping as required in Part I.D.5.e.(i)(a); (i) The permittee shall develop, revise, implement, and enforce a program to detect and eliminate illicit discharges (as defined at 40 CFR 122.26(b)(2)) entering the MS4. Permittees previously covered under NMS000101 or NMR040000 must continue existing programs while updating those programs, as necessary, to comply with the requirements of this permit. The permittee must: (a) Develop, if not already completed, a storm sewer system map showing the names and locations of all outfalls as well as the names and locations of all waters of the United States that receive discharges from those outfalls. Identify all discharges points into major drainage channels draining more than twenty (20) percent of the MS4 area;	UNM completed a campus utility map in 2013, which includes its storm sever map. UNM continues to revise and update its storm sewer system map as necessary.	Updates to the map will be reported in the annual report. .	UNM does not have what would be considered outfalls as defined in Part VII of the permit. However, UNM has identified significant discharge points into major drainage channels. EHS updated campus utility maps to include location, condition, and photos of all storm drains and sewers. The new utility map is now integrated into a GIS repository managed by UNM's Earth Data Analysis Center. EHS also maintains an internal dashboard, showing IDDE investigations (Figure 6). The intent of the tool is to systematically streamline investigations and reports and to understand where and how IDDE occurs. Over time, the tool shows IDDE "hot spots" and identifies common issues that can be addressed with interventions to further reduce IDDE.

4.2. Ordinance (or other control methods) as required in Part I.D.5.e.(i)(b): (b) To the extent allowable under State, Tribal, or local law, effectively prohibit, through ordinance or other regulatory mechanisms, non-stormwater discharges into the MS4, and implement appropriate enforcement procedures and actions;	UNM does not have formal regulatory enforcement power since it is not a traditional municipality, but UNM can utilize contractual and employee disciplinary mechanisms to discourage non-stormwater discharges from contractors and employees, respectively. To the extent possible, EHS will work with other UNM departments and stakeholders (e.g., developers) to train appropriate personnel about mitigating IDDE. EHS will also issue NOVs (Notices of Violations) as required per UNM's IDDE Plan.	To develop mechanisms to control non-stormwater discharges into the MS4 and implement appropriate enforcement procedures and actions	UNM continued to implement its activities to detect and eliminate illicit discharges. EHS continued to train staff on how to detect and report illicit discharges. The following standards and guidelines prohibit non-stormwater discharges into the MS4: • UNM's IDDE Plan • UNM's Stormwater Guidance for Staff and Contractors • UNM's Oil Spill Prevention, Control, and Countermeasure (SPCC) Plan • SOP for Oil Tanks at UNM & Health Sciences • UNM's Construction Safety Manual • UNM's Chemical Hygiene Plan
4.3. Develop and implement an IDDE plan as required in Part I.D.5.e.(i)(c):	UNM will implement efforts to detect and eliminate illicit discharges and improper disposal that may impact the quality of stormwater discharged from the campus.	To develop an IDDE plan and reduce illicit discharges.	A third-party contractor developed an IDDE plan on September 13, 2017. IDDE inspections were

(c) Develop and implement a plan to detect and address non-stormwater discharges, including illegal dumping, to the MS4. The permittee must include the following elements in the plan: A. Procedures for locating priority areas likely to have illicit discharges, including field tests for selected pollutant indicators (ammonia, boron, chlorine, color, conductivity, detergents, E. coli, enterococci, total coliform, fluoride, hardness, pH, potassium, conductivity, surfactants), and visually screening outfalls during dry weather; B. Procedures for enforcement, including enforcement escalation procedures for recalcitrant or repeat offenders; C. Procedures for removing the source of the discharge; D. Procedures for program evaluation and assessment; and E. Procedures for coordination with adjacent municipalities and/or state, tribal, or federal regulatory agencies to address situations where investigations indicate the illicit discharge originates outside the MS4 jurisdiction.	EHS will manage UNM's IDDE Program and maintain maps applicable to the campus. Newly discovered IDDE will be assessed for their potential impact on the Rio Grande. EHS will investigate dry stormwater discharges. Initial assessments of stormwater quality will occur by visual methods. As suspicious water quality conditions are encountered, water quality samples may be tested with field instruments to monitor conductivity, pH, temperature, dissolved oxygen, turbidity, etc. If visual and field instrumentation assessment is unsatisfactory and another contamination is suspected, then grab samples may be collected for potentially applicable lab analysis by EPA methods, e.g., TPH, BTEX, E. Coli, nitrates/nitrite, etc. If unusual levels of water quality contaminants are observed, UNM will analyze the above information to identify the source (on campus) or up-gradient discharge location (off campus). UNM will notify relevant MS4 entities if IDDE is suspected to be discharged from their jurisdiction onto campus. If UNM identifies a significant illicit discharge or improper disposal on campus, then that finding and a brief explanation of any potential hazard will be posted on an EHS website page to inform any interested members of the campus or local communities.		conducted at facilities identified as potential sources for illicit discharges. Additionally, all reports of illicit discharges are investigated, and a written report is issued to the appropriate staff for corrective action. If the source of an illicit discharge is outside the jurisdiction of UNM, it is referred to the appropriate authority (e.g., the City of Albuquerque). During this reporting year, of the 3 IDDE investigations, 0 resulted in the issuance of NOV per the UNM IDDE Plan. All investigations resulted in conversations with affected employees and supervisors to discourage IDDE and train them about the impacts of their actions. EHS continued to use an IDDE dashboard to track incidents and report basic statistics that can be used to intervene in future operations to reduce illicit discharge (Figure 6).

	EHS will incorporate that finding into stormwater quality training for the associated UNM staff that can best control the problem. IDDE screening and inspections will be conducted at the frequency outlined in UNM's written IDDE Plan.		
4.4. Develop an education program as required in Part I.D.5.e.(i)(d): (d) Develop an education program to promote, publicize, and facilitate public reporting of illicit connections or discharges and distribution of outreach materials. The permittee shall inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.	By June 20, 2016, EHS will include in its education program information to promote and facilitate anonymous reporting of illicit connections or discharges by the campus community.		A written education program has been completed and is incorporated by reference into this SWMP. Copies are available upon request. EHS provided and maintained two primary reporting methods for illicit discharge: (1) The **Accident, Incident & Spill Reporting** form is available 24/7 to report spills at goto.unm.edu/spill; & (2) A 24/7 Duty Officer is available to respond to reports of illicit discharges by calling (505) 951-0794. EHS informed UNM employees and students about these two methods

			in various training courses and E&O events.
4.5. Establish a hotline as required in Part I.D.5.e.(i)(e): (e) Establish a hotline to address complaints from the public.	Complaints from the public can be directed to EHS, which will conduct an investigation or notify the appropriate parties.	Complaints from the public will be tracked, recorded, and reported.	EHS has a 24/7 Duty Officer program and a reporting website where complaints can be reported.
4.6. Investigate suspected significant/severe illicit discharges as required in Part I.D.5.e.(i)(f); (f) Investigate suspected significant/severe illicit discharges within forty-eight (48) hours of detection and all other discharges as soon as practicable; elimination of such discharges as expeditiously as possible; and requirement of immediate cessation of illicit discharges upon confirmation of responsible parties.	EHS will investigate all suspected significant/severe illicit discharges within forty-eight (48) hours of detection and all other discharges as soon as practicable; eliminate such discharges as expeditiously as possible; and require the immediate cessation of illicit discharges upon confirmation of responsible parties.	To track illicit discharges across UNM.	A review of the investigation process was completed as part of the updates to the IDDE plan. For this reporting year: • 35 (-2% YOY) total illicit discharge investigations were conducted ○ 3 (100% YOY) was community-reported; ○ 0 (+100% YOY) was from a construction site SWPPP inspection; & ○ 32 (0% YOY) were (regular) dry day investigations. • 3 investigations resulted in a corrective action conversation.

			• 32 (0% YOY) investigations were determined to have no illicit discharge whatsoever.
4.7. Review complaint records and develop a targeted source reduction program as required in Part I.D.5.e.(i)(g): (g) Review complaint records for the last permit term and develop a targeted source reduction program for those illicit discharge/improper disposal incidents that have occurred more than twice in two (2) or more years from different locations. (Applicable only to class A and B permittees)	EHS will maintain a log of complaint records from the last permit term and target source reduction efforts to repeat discharge incidents. EHS will investigate IDDE within 48 hours of being reported and will eliminate illicit discharges or improper disposal on campus within 30 days. If more time is needed, then EHS will develop an elimination schedule to be completed within no more than six months. EHS will track and review NOV records to identify repeat offenders to prioritize remedial training aimed at mitigating IDDE.	To identify "hot spots" for illicit discharge and repeat offenders so that the targeted source reduction program is effective.	No repeat violators were responsible for the recorded illicit discharge. The dashboard tool continues to help UNM better track not only all repeat offenders, but all illicit discharges.
4.8. Screening of system as required in Part I.D.5.e.(iii) as follows: (iii) The permittee must screen the entire jurisdiction at least once every five (5) years and high-priority areas at least once every year. High-priority areas include any area where there is ongoing evidence of illicit discharges or dumping or where there are citizen complaints on more than five (5)	The screening will occur as part of the IDDE Plan. The screening will be done according to the schedule in the permit.	To inspect all high-priority areas and the entire jurisdiction annually.	All high-priority areas and the entire jurisdiction were visually inspected for illicit discharge this reporting year. Screening the entire jurisdiction is relatively achievable compared to other municipalities due to the small acreage (i.e., size) of UNM's MS4.

separate events within twelve (12) months. The permittee must: (a) Include in its SWMP document a description of the means, methods, quality assurance and controls protocols, and schedule for successfully implementing the required screening, field monitoring, laboratory analysis, investigations, and analysis evaluation of data collected. (b) Comply with the dry weather screening program established in Table 6 and the monitoring requirements specified in Part III.A.2. (c) If applicable, implement the priority ranking system developed in the previous permit term.			
4.9. Develop, update, and implement a Waste Collection Program as required in Part I.D.5.e.(iv): (iv) Waste Collection Programs: The permittee must develop, update, and implement programs to collect used motor vehicle fluids (at a minimum, oil, and antifreeze) for recycling, reuse, or proper disposal, and to collect household hazardous waste materials (including paint, solvents, fertilizers, pesticides, herbicides, and other hazardous materials) for recycle,	UNM's Facilities Management Department's O&M program will identify waste disposal standard operating procedures (SOPs), including SOPs for motor vehicle fluids, toxic paints, solvents, fertilizers, pesticides, herbicides, and any other hazardous materials. This will include a list of opportunities for recycling substances. Also, SOPs will address the removal of sediments, debris, floatables, and litter, including pet wastes. This will be completed by June 20, 2017.	To increase recycling and reuse of hazardous materials and to reduce the potential for improper disposal.	UNM's Stormwater O&M Program contains a description of waste management operations. UNM's Facilities Design & Construction Department continued to operate a waste collection program that included recycling. EHS continued to operate its hazardous waste collection and disposal program across campus.

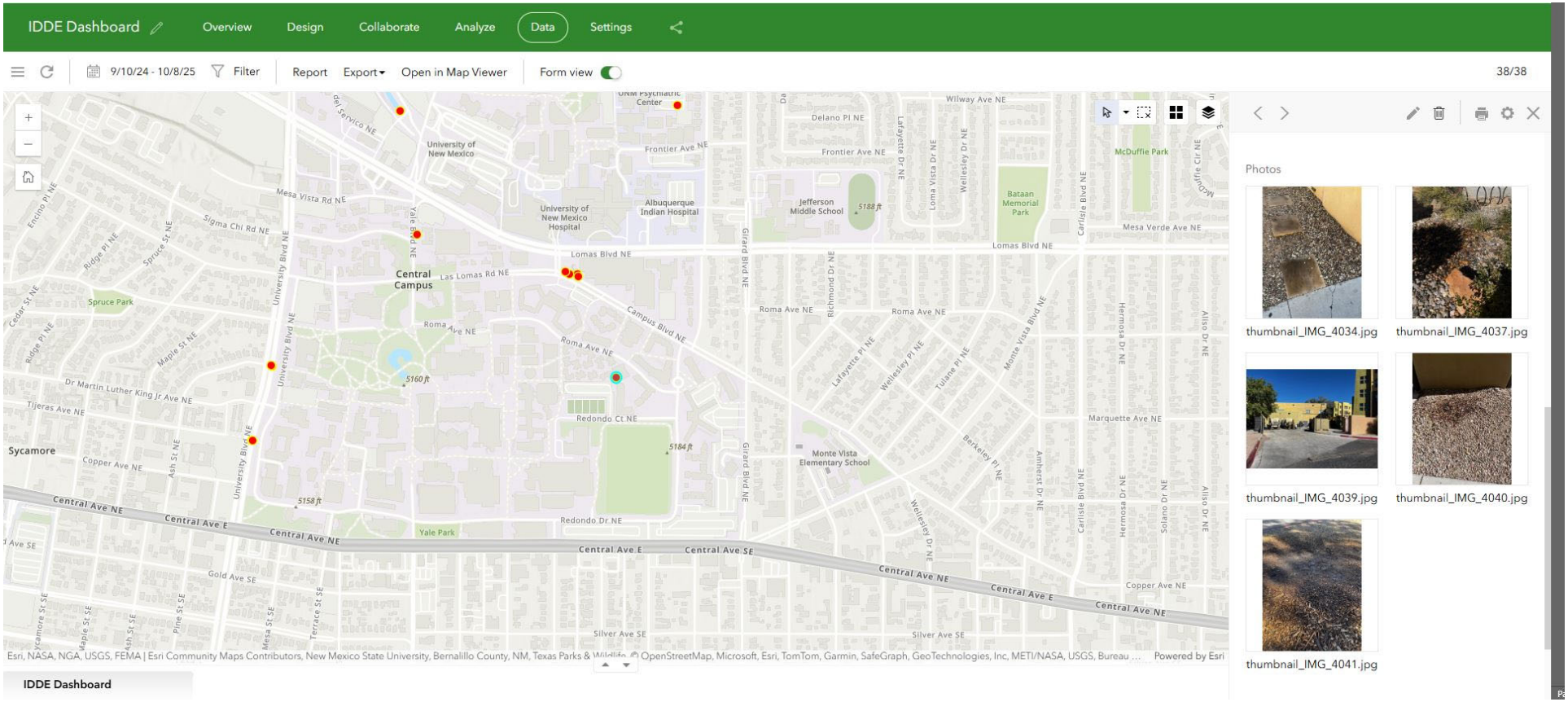
reuse, or proper disposal. Where available, collection programs operated by third parties may be a component of the programs. Permittees shall enhance these programs by establishing the following elements as a goal in the SWMP: A. Increasing the frequency of the collection days hosted; B. Expanding the program to include commercial fats, oils, and greases; and C. Coordinating program efforts between applicable permittee departments.	While EHS collects and disposes of hazardous waste (per RCRA), UNM does not have a traditional household hazardous waste collection facility. Nonetheless, EHS will collect and dispose of any hazardous waste associated with UNM operations and student living.		See the above section on Waste Collection Programs for more details.
4.10. Develop, update and implement a Spill Prevention and Response program to prevent, contain, and respond to spills that may discharge into the MS4 as required in Part I.D.5.e.(v): (v) Spill Prevention and Response. The permittee must develop, update and implement a program to prevent, contain, and respond to spills that may discharge into the MS4. The permittees must continue existing programs while updating those programs, as necessary, to comply with the requirements of this permit. The Spill Prevention and Response program shall include:	EHS has developed and regularly updates spill prevention and response programs. Specifically, EHS maintains a Spill Response Team administered by the UNM Chemical Hygiene Officer. At a minimum, all team members are trained in HAZWOPER-24. When this team determines that a spill is too large or dangerous to respond to, environmental and safety measures will be implemented to stabilize the incident until an on-call contractor can respond to manage the spill. EHS will also implement and maintain UNM's Spill Prevention, Control, and Countermeasure (SPCC) Plan, per 40 CFR 112.	To implement, maintain, and expand a spill prevention and response program. To establish and maintain a Spill Response Team capable of managing spills that may discharge to the MS4.	EHS maintained spill reporting methods and a response team with on-call spill response contractors. Per 40 CFR 112, EHS continues to implement the *UNM Spill Prevention, Control, & Countermeasure (SPCC) Plan* during the reporting period. The plan is set to expire in September 2028, as it was just revised in the RY24. During the reporting period, there were no spills

(a) Where the discharge of material resulting from a spill is necessary to prevent loss of life, personal injury, or severe property damage, the permittee(s) shall take, or ensure the party responsible for the spill takes, all reasonable steps to control or prevent any adverse effects to human health or the environment: and (b) The spill response program may include a combination of spill response actions by the permittee (and/or another public or private entity) and legal requirements for private entities within the permittee's municipal jurisdiction.	EHS will maintain spill reporting mechanisms for the campus community. A complete review of these programs will be completed by June 20, 2017.		that had the potential to significantly impact water quality.
4.11. Enhance the program to include requirements in Part I.D.5.e.(ix): (ix) The permittee may: (a) Divide the jurisdiction into assessment areas where monitoring at fewer locations would still provide sufficient information to determine the presence or absence of illicit discharges within the larger area; (b) Downgrade high priority areas after the area has been screened at least once, and there are citizen complaints on no more than five (5) separate events within a twelve (12) month period;	EHS identifies six primary sub-basins to monitor for illicit discharge. These basins are sub-watersheds (identified using AMAFCA's GIS data) that each discharge into other MS4s (e.g., AMAFCA, COA). Downgrading will not be performed, given that all identified high-risk areas are easily surveyed annually. UNM will rely on TAG members (i.e., a cooperative MS4 group) for additional detection and elimination of illicit discharges	An update on progress will be included in the annual report.	32 (0% YOY) dry day inspections occurred this reporting year across UNM's six watershed basins.

(c) Rely on a cooperative program with other MS4s for detection and elimination of illicit discharges and illegal dumping; (d) If participating in a cooperative program with other MS4s, required detection program frequencies may be based on the combined jurisdictional area rather than individual jurisdictional areas and may use assessment areas crossing jurisdictional boundaries to reduce the total number of screening locations (e.g., a shared single screening location that would provide information on more than one jurisdiction); and (e) After screening a non-high priority area once, adopt an "in response to complaints only" IDDE for that area, provided there are citizen complaints on no more than two (2) separate events within a twelve (12) month period. (f) Enhance the program to utilize procedures and methodologies consistent with those described in "Illicit Discharge Detection and Elimination, A Guidance Manual for Program Development and Technical Assessments."			
		N/A	N/A

4.12. Describe other proposed activities to address the Illicit Discharges and Improper Disposal Measure:	No additional activities are being proposed at this time. UNM will continue to explore additional activities to address the Illicit Discharges and Improper Disposal Measure.		

Figure 6 - Screenshot of UNM's IDDE Inspection Results Dashboard for RY25



Requirement	Plan	Goal	Status
4.1.1 Ordinance (or other control methods) as required in Part I.D.5.d.(i): (i) The permittee must control through ordinance, permit, contract, order, or similar means the contribution of pollutants to the municipal storm sewer by stormwater discharges associated with industrial activity and the quality of stormwater discharged from sites of industrial activity as defined in 40 CFR 122.26(b)(14)(i)-(ix) and (xi). If no such industrial activities are in a permittee's jurisdiction, that permittee may certify that this program element does not apply.	UNM does not have operations within the campus jurisdiction that would normally be categorized as industrial. UNM self-certifies that this program element does not apply.	N/A	N/A
4.2. Continue implementation and Enforcement of the Industrial and High-Risk Runoff program, assess the overall success of the program, and document both direct and indirect measurements of program effectiveness in the annual report as required in Part I.D.5.d.(ii): (ii) The permittee must continue implementation and enforcement of the Industrial and High-Risk Runoff program, assess the overall success of the program, and document both direct and indirect measurements of program effectiveness in the annual report. The program shall include: (a) A description of a program to identify, monitor, and control pollutants in stormwater discharges to the MS4 from municipal landfills; other treatment, storage, or disposal facilities for	UNM does not have operations within the campus jurisdiction that would normally be categorized as industrial. UNM self-certifies that this program element does not apply.	N/A	N/A

municipal waste (e.g., transfer stations, incinerators, etc.); hazardous waste treatment, storage, disposal, and recovery facilities; facilities that are subject to EPCRA Title III, Section 313; and any other industrial or commercial discharge the permittee(s) determines are contributing a substantial pollutant loading to the MS4. (Note: If no such facilities are in a permittee's jurisdiction, that permittee may certify that this program element does not apply.); and (b) Priorities and procedures for inspections and establishing and implementing control measures for such discharges.			
4.3. Meet the monitoring requirements in Part I.D.5.d.(iii): (iii) Permittees must comply with the monitoring requirements specified in Part III.A.4;	UNM will serve on the Technical Advisory Group (TAG) and participate in voluntary monitoring.	To encourage participation in program development and implementation.	EHS attended and participated in all of the Technical Advisory Group (TAG) meetings this reporting year. EHS continues to financially support AMAFCA's efforts in leading the (voluntary) Compliance Monitoring Cooperative (CMC) to sample for surface water contaminants in the upstream and downstream permit-regulated sections of the Rio Grande.
4.4. Include requirements in Part I.D.5.d.(iv): (iv) The permittee must modify the following as necessary:	UNM does not have operations within the campus jurisdiction that would normally be categorized as	N/A	N/A

(a) The list of the facilities included in the program, by category and basin; (b) Schedules and frequency of inspection for listed facilities. Facility inspections may be carried out in conjunction with other municipal programs (e.g., pretreatment inspections of industrial users, health inspections, fire inspections, etc.) but must include random inspections for facilities not normally visited by the municipality; (c) The priorities for inspections and procedures used during inspections (e.g., inspection checklist, review for NPDES permit coverage; review of stormwater pollution prevention plan; etc.); and (d) Monitoring frequency, parameters, and the entity performing monitoring and analyses (MS4 permittees or subject facility). The monitoring program may include a waiver of monitoring for parameters at individual facilities based on a "no-exposure" certification;	industrial. UNM self-certifies that this program element does not apply.		
4.5. Enhance the program to include requirements in Part I.D.5.d.(vii): (vii) The permittee may: (a) Use analytical monitoring data, on a parameter-by-parameter basis, that a facility has collected to comply with or apply for a State or NPDES discharge permit (other than this permit) so as to avoid unnecessary cost and duplication of effort;	UNM does not have operations within the campus jurisdiction that would normally be categorized as industrial. UNM self-certifies that this program element does not apply.	N/A	N/A

(b) Allow the facility to test only one (1) outfall and to report that the quantitative data also apply to the substantially identical outfalls if: A. A Type 1 or Type 2 industrial facility has two or more outfalls with substantially identical effluents, and B. Demonstration by the facility that the stormwater outfalls are substantially identical, using one or all of the following methods for such demonstration. The NPDES Stormwater Sampling Guidance Document (EPA 833-B-92-001), available on EPA's website, provides detailed guidance on each of the three options: (1) submission of a narrative description and a site map; (2) submission of matrices; or (3) submission of model matrices. (c) Accept a copy of a "no exposure" certification from a facility made to EPA under 40 CFR §122.26(g), in lieu of analytic monitoring.			
4.6. Describe other proposed activities to address the Industrial and High-Risk Runoff Measure:	UNM does not have operations within the campus jurisdiction that would normally be categorized as industrial. UNM self-certifies that this program element does not apply.	N/A	N/A

Requirement	Plan	Goal	Status
As described in Part III, A.1, permittees shall conduct wet weather monitoring to gather information on the response of receiving waters to wet weather discharges from the MS4 during both the wet season (July 1 through October 31) and dry Season (November 1 through June 30). Wet Weather Monitoring shall be conducted at outfalls, internal sampling stations, and/or in-stream monitoring locations at each water of the US that runs in each entity or entity's jurisdiction(s). Permittees may choose either Option A (individual monitoring) or Option B (cooperative monitoring program). As described in Part III A.1.b: A cooperative monitoring program will monitor waters coming into the watershed (upstream) and leaving the watershed (downstream). Include sampling for TSS, TDS, COD, BOD5, DO, oil and grease, E.coli, pH, total Kjeldahl nitrogen, nitrate plus nitrite, dissolved phosphorus, total ammonia plus organic nitrogen, total phosphorus, PCBs, and Gross alpha.	UNM and its current MS4 partners have hired the USGS to perform sample collection at five representative outfall locations. If new wet weather monitoring sites are installed, a certification that they are operational and actual monitoring at these sites will be provided by April 15, 2016. A detailed description of the monitoring scheme will be submitted for EPA and NMED approval by December 2015. Samples will be analyzed for all of the parameters in Part III A.1.b according to the schedule in Part III A.1.b for wet weather. Composite samples are collected using an automated ISCO sampling device. Grab samples are collected by USGS personnel. Temperature probes continuously record air and water temperatures. Sondes are used to monitor D.O., water temperature, and conductivity.	Provide results of the assessment in each annual report.	UNM participates in the Technical Advisory Group (TAG) and remained a signatory and financial contributor to an intergovernmental agreement with several permittees during the reporting year. Previously, TAG also provided the EPA with a monitoring plan and received a certification to start monitoring stormwater. Per that plan, Discharge Monitoring Reports (DMRs) are submitted by only one member (i.e., AMAFCA) on behalf of all TAG permittees. • It should be noted that the EPA's public-facing Enforcement and Compliance History Online (ECHO) tool does not reflect this intergovernmental agreement or its single reporting structure, which therefore **incorrectly** displays UNM as non-compliant with DMR reporting.

Monitoring for temperature at outfalls and/or Rio Grande monitoring locations. Include additional parameters from monitoring conducted under permits NMS000101, NMR040000, or/and NMR04000I, whose mean values are at or above a WQS. Sample the pollutants for a minimum of 7 storm events per location during the permit term, with at least three events during the wet season and two events in the dry season.			

Dry Weather Discharge Screening of MS4

Requirement	Plan	Goal	Status
As described in part III.A.2, the permittee shall: Identify, investigate, and address areas within its jurisdiction that may be contributing excessive levels of pollutants to the Municipal Separate Storm Sewer System as a result of dry weather discharges (i.e., discharges from separate storm sewers that occur without the direct influence of runoff from storm events, e.g., illicit discharges, allowable non-stormwater, groundwater infiltration, etc.). Due to the arid and semi-arid conditions of the area, the dry weather discharges screening program may be carried out during both the wet season (July 1 through October 31) and dry	There are no perennial streams in the Albuquerque Metropolitan area. Accordingly, the dry weather screening program serves a dual purpose as an illicit discharge screening analysis. Seventeen locations, which screen 100% of the MS4 and target industrial areas, have been chosen. Should any discharge be present in a quantity sufficient for analysis, it will be screened for BOD5, sediment, or a parameter addressing sediment (e.g., TSS or turbidity), *E. coli*, Oil	Provide results of the assessment in each annual report.	32 (0% YOY) dry day inspections occurred this reporting year across UNM's six watershed basins.

Season (November 1 through June 30). This program may be coordinated with the illicit discharge detection and elimination program required in Part I.D.5.e. Include sufficient screening points to adequately assess pollutant levels from all areas of the MS4. Screen for, at a minimum, BOD5, sediment, or a parameter addressing sediment (e.g., TSS or turbidity), E. coli, Oil and Grease, nutrients, and any pollutant that has been identified as a cause of impairment of a waterbody receiving discharges from that portion of the MS4, including temperature. Specify the sampling and non-sampling techniques to be issued for initial screening and follow-up purposes. Sample collection and analysis need not conform to the requirements of 40 CFR Part 136; and Perform monitoring only when an antecedent dry period of at least seventy-two (72) hours after a rain event greater than 0.1 inch in magnitude is satisfied.	and Grease, and nutrients. Any discharge collected will be a grab sample.		

Discharges to Impaired Waters

Requirement	Plan	Goal	Status
6.1.1. The permittee shall control the discharges of pollutant(s) of concern to impaired waters and waters with approved TMDLs as provided in sections (i) and (ii) below and shall assess the success in controlling those pollutants. (i) Discharges to Water Quality Impaired Water Bodies with an Approved TMDL: If the permittee discharges to an impaired water body with an approved TMDL (see Appendix B of permit), where stormwater has the potential to cause or contribute to the impairment, the permittee shall include in the SWMP controls targeting the pollutant(s) of concern along with any additional or modified controls required in the TMDL and this section. The SWMP and required annual reports must include information on implementing any focused controls required to reduce the pollutant(s) of concern. (ii) Discharges Directly to Water Quality Impaired Water Bodies without an Approved TMDL: The permittee shall also determine whether the permitted discharge is direct to one or more water quality impaired water bodies where a TMDL has not yet	UNM continues to implement practices that reduce bacterial contamination of stormwater. Most of these practices have multi-purpose benefits in addition to stormwater pollution prevention and bacterial reduction. These ongoing practices involve the structural best management practices (BMPs) in the operation of facilities and grounds as well as our public education and outreach efforts. The following describes UNM's program to minimize contamination of stormwater. UNM is aware of the bacterial source tracking study in the local Middle Rio Grande watershed, which identified the various sources of animal enteric bacteria contributions. The study indicated that birds contributed the most at roughly a third of the bacteria loading. Dogs were the second largest source. Therefore, UNM's efforts have been focused on controlling bird and dog waste impacts on stormwater. (1) Pet Waste Stations - UNM's campus is open to the public, and people walk their dogs on campus. This activity is centered around the green spaces (e.g., the Duck Pond on the Central Campus and the Golf Course on North Campus). UNM's Facilities Management Department has installed and maintains pet waste disposal bag dispensers across campus. The North Campus Neighborhood Association has also been stocking shopping bags for similar purposes on the southeast corner of the North Golf Course, where many folks begin on the perimeter jogging trail. This is also a notable example of public involvement with stormwater pollution prevention on campus. (2) Bird Controls - UNM continues bird control efforts, especially related to roosting pigeons on UNM buildings. Bird control efforts range from netting at Coronado Hall's trash storage area, equipment bird skirting at the	Submission of water quality monitoring results in DMRs and Annual Reports.	UNM participates in the Technical Advisory Group (TAG) and remained a signatory and financial contributor to an intergovernmental agreement with several permittees during the reporting year. Previously, TAG also provided the EPA with a monitoring plan and received a certification to start monitoring stormwater. Per that plan, Discharge Monitoring Reports (DMRs) are submitted by only one member (i.e., AMAFCA) on behalf of all TAG permittees. • It should be noted that the EPA's public-facing Enforcement and Compliance History Online

been approved by NMED and EPA. If the permittee discharges directly into an impaired water body without an approved TMDL, the permittee shall perform certain activities (see permit for a full description of such activities).	Business Center, and bird control wires on the Electrical Engineering & Computer Engineering building window sills. UNM also has an ongoing trapping program that captures hundreds of pigeons a year on many campus rooftops or wherever there may be a roosting problem. (3) Street and Sidewalk Sweeping - UNM makes a great effort to keep the campus grounds beautiful. UNM's Facilities Management Department's efforts include regular street sweeping and sidewalk sweeping. UNM's street sweeping schedule may be among the most frequent in the metro area, and this serves to protect stormwater quality from contaminants, including bacteria-laden animal wastes on hardscaping. (4) Trash & Litter Controls - The local bacterial tracking study also indicated that humans are one of the smaller sources of bacterial contamination in stormwater. In addition to the homeless population in the metro area that may not be using bathrooms, it was recognized that leaking trash dumpsters and compactors might contribute to some of the human contamination. Therefore, lids are installed and kept closed on UNM's large trash dumpsters to keep stormwater out. The multitude of small trash receptacles along campus sidewalks, at building entrances, etc., are also always lined with trash bags and usually topped with lids that allow trash in and keep it inside. Bagging and lids also prevent wind from blowing trash out of dumpsters and receptacles. (5) Leaked Fluid - If trash compactors leak fluids, the standard practice at UNM is to absorb the leaked fluids and dispose of the absorbent with the other solid waste. Litter is picked up daily, Monday through Friday, all over campus and is disposed of properly with other solid wastes. Litter pickup includes scooping visible pet waste as well as floatables/litter. UNM notifies the COA about problems with pet wastes being left by occupants of neighboring apartment complexes who bring their dogs onto campus property to defecate.		(ECHO) tool does not reflect this intergovernmental agreement or its single reporting structure, which therefore **incorrectly** displays UNM as non-compliant with DMR reporting.

	(6) Stormwater Retention Ponds - UNM has a few stormwater retention ponds on the South Campus and on the North Campus. In addition to reducing peak flow into the local MS4, these ponds act to settle out suspended solids and expose bacteria to solar UV radiation. Solar UV disinfection and settling out suspended solids both help to reduce bacteria levels in stormwater discharged from campus. (7) Public Education and Outreach & Campus Training - Stormwater pollution prevention training will become part of UNM's Mandatory Basic Annual Safety Training (BAST) program for all UNM employees. Additionally, EHS conducts specialized stormwater pollution prevention training for UNM's Facilities Management Department employees. EHS's specialized training includes an emphasis on pet waste pickup and measures to minimize bacterial, nutrient, and sediment contamination. At UNM's Welcome Back Days event at the beginning of each semester, EHS hosts booths with handouts on stormwater pollution prevention, including pet wastes and measures to minimize bacterial contamination. EHS's website also has information on stormwater pollution prevention, including pet wastes and measures to minimize bacterial contamination. UNM continues to operate pursuant to the COA bacterial program as necessary for consistency with the E-Coli TMDL. UNM, as a Phase 1 MS4 participant in a cooperative monitoring program, continues to pay a share of the monitoring costs for stormwater monitoring work. UNM remains involved in the decisions and reports that this monitoring cooperative generates until such time when a new monitoring cooperative is formed. UNM will calculate WLA for impaired waters and may coordinate efforts with other watershed permittees.		

MCM Table 5 – Management of Construction Site Runoff

Requirement	Plan	Goal	Status
5.1 Development of an ordinance or other regulatory mechanism as required in Part I.D.5.a.(ii)(a), The program must include the development, implementation, and enforcement of, at a minimum: (a) An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under State, Tribal, or local law;	UNM does not have formal enforcement authority like traditional MS4s. Accordingly, EHS, UNM's Facilities Management Department, and UNM's Office of Planning, Design & Construction (PDC) will continue to review, revise, and enforce existing design and construction standards and guidelines, and develop new guidelines where appropriate.	Revisions to existing policy, design, or construction standards and guidelines; or the creation of new policy, design, or construction standards and guidelines that pertain to erosion and sediment control will be tracked and reported in the annual report.	EHS continues to implement its *Stormwater Guidance for UNM Staff and Contractors*. The guidance document provides rules for construction sites greater than or equal to one acre.
5.2. Develop requirements and procedures as required in Part I.D.5.a.(ii)(b) through in Part I.D.5.a.(ii)(h) (b) Requirements for construction site operators to implement appropriate erosion and sediment control best management practices (both structural and non-structural); (c) Requirements for construction site operators to control waste such as, but not limited to, discarded	EHS and other UNM departments will continue to inform UNM contractors of requirements and review necessary documents (i.e., erosion control plan, SWPPP/eNOI application, and fugitive dust permit) during the Construction Review Process. EHS and other UNM departments will continue to oversee UNM contractors to ensure that they comply with federal and state law and contractual provisions implementing a Stormwater Pollution Prevention Plan (SWPPP).	Revisions to existing policy, design, or construction standards and guidelines; or the creation of new policy, design, or construction standards and guidelines that pertain to erosion and sediment control will be tracked and reported in the annual report. EHS and other UNM departments will maintain	During the reporting year, 7 (40% YOY) construction sites were inspected monthly by the respective owners for compliance with the EPA's 2022 Construction General Permit (CGP): 1. UNM – UNM Police Headquarters 2. UNM – CON & PHE 3. UNMH – ACCH Tower 4. UNMH – CCAT 5. UNMH- Cancer Center

building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality (see EPA guidance at http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.c). (d) Procedures for site plan review, which incorporate consideration of potential water quality impacts. The site plan review must be conducted prior to the commencement of construction activities and include a review of the site design, the planned operations at the construction site, and the planned control measures during the construction phase (including the technical criteria for selection of the control measures), and the planned controls to be used to manage runoff created after the development; (e) Procedures for receipt and consideration of information submitted by the public; (f) Procedures for a site inspection (during construction) and enforcement of control measures, including provisions to ensure proper construction, operation, maintenance, and repair. The procedures must clearly define who is responsible for site inspections; who has the authority to implement	UNM's Facilities Management Department's Environmental Services Design & Development Standard Requirements prohibit the washing of concrete trucks in an uncontrolled area and require the removal of construction debris, including concrete tailings from the site. EHS and other UNM departments will continue to review site plans and attend pre-construction review meetings to try to ensure consistency with applicable stormwater quality requirements. The plan review must occur prior to construction and focus on construction and post-construction stormwater quality measures that address likely impacts and public concerns. The site plan review must include an evaluation of opportunities for incorporating green infrastructure (GI). UNM will continue to comply with the CGP, including SWPPP preparation and eNOI application for all public projects greater than one acre. UNM continues to welcome public participation in its SWMP. The draft SWMP was published for public comment before submission to the EPA. Public comments were reviewed and addressed accordingly. The EHS Department continues to involve other UNM departments as stakeholders in the development and revision of UNM's SWMP. UNM will continue to develop inspection procedures for exterior construction sites less than 1 acre. The new procedures will include: (1) determining who is responsible for	records of documents required from contractors pertaining to Stormwater (i.e., erosion control plan, SWPP/eNOI application, and fugitive dust permit). The number of documents will be reported in the annual report. Site plan reviews and evaluation of opportunities for incorporating green infrastructure (GI) will be documented and reported in the annual report. Finalized inspection procedures for exterior construction sites less than 1 acre will be included in the annual report as an appendix. EHS will maintain records of the number of trainings offered on the SWMP and general stormwater pollution prevention (P2) basics and will report these in the annual report.	6. UNM - ROTC Track 7. Children's Psych Center Operator inspections also occurred for all of these sites, at the schedule required by the CGP. Furthermore, the CON & PHE successfully completed construction and submitted Notices of Termination (NOT). A Notice of Intent (NOI) was field for the CCAT, ROTC Track, and the Children's Psych Center, and UNM Police Headquarters. Construction at ACCH Tower and the Cancer center has continued for the RY25. Inspection reports, NOIs, and NOTs for each site are available for review upon request. The inspector maintained the *Certified Stormwater Inspector (CSI)* credential from the National Stormwater Center, LLC. (NPDES.com). During the reporting year, EHS reviewed site plans for the above-mentioned projects.

enforcement procedures; and the steps utilized to identify priority sites for inspection and enforcement based on the nature of the construction activity, topography, and the characteristics of soils and the quality of the receiving water. If a construction site operator fails to comply with procedures or policies established by the permittee, the permittee may request EPA enforcement assistance. The site inspection and enforcement procedures must describe sanctions and enforcement mechanism(s) for violations of permit requirements and penalties with detail regarding corrective action follow-up procedures, including enforcement escalation procedures for recalcitrant or repeat offenders. Possible sanctions include non-monetary penalties (such as stop work orders and/or permit denials for non-compliance), as well as monetary penalties such as fines and bonding requirements; (g) Procedures to educate and train permittee personnel involved in the planning, review, permitting, and/or approval of construction site plans, inspections, and enforcement. Education and training shall also be provided for developers, construction site operators, contractors, and supporting personnel, including requiring a stormwater pollution	conducting UNM construction site stormwater quality inspections; determining who has authority to implement enforcement procedures regarding construction stormwater quality at UNM; developing a process for prioritizing sites for inspection and enforcement based on the type of construction activity; inspecting all sites greater than 1-acre at least once per month and follow up on any deficiencies to ensure corrective action; inspecting sites once project team believes final site stabilization is complete, and describing enforcement procedures and any penalties for repeated non-compliance at a UNM construction site. The leadership of PDC & FM will be engaged by EHS in the development and implementation of UNM's SWMP. Once the SWMP is finalized, training on the SWMP and general stormwater pollution prevention (P2) basics will be offered. UNM will continue its procedures for construction project record-keeping, including site reviews, inspections, inspection reports, and any enforcement letters & documents.		EHS successfully requested project managers from all new construction sites to assess the costs, benefits, and feasibility of incorporating GI/LID. Those assessments are available upon request. Inspection procedures for construction sites less than 1 acre have been completed and are incorporated into the *Stormwater Guidance for UNM Staff & Contractors*. Operator inspections also occurred for all of these sites, at the schedule required by the CGP. The UNM SWMP was finalized and sent FDC Department and is being implemented. Training material on stormwater management and pollution prevention was finalized, and training was provided to the UNM Grounds and Landscaping Staff. Inspection procedures for construction sites less than 1 acre have been completed and are

prevention plan for construction sites within the permittee's jurisdiction; (h) Procedures for keeping records of and tracking all regulated construction activities within the MS4, i.e., site reviews, inspections, inspection reports, warning letters, and other enforcement documents. A summary of the number and frequency of site reviews, inspections (including inspector's checklist for oversight of sediment and erosion controls and proper disposal of construction wastes), and enforcement activities that are conducted annually and cumulatively during the permit term shall be included in each annual report;			incorporated into the *Stormwater Guidance for UNM Staff & Contractors*.
5.3. Annually conduct site inspections of 100 percent of all construction projects cumulatively disturbing one (1) or more acres as required in Part I.D.5.a.(iii): (iii) Annually conduct site inspections of 100 percent of all construction projects cumulatively disturbing one (1) or more acres within the MS4 jurisdiction. Site inspections are to be followed by any necessary compliance or enforcement action. Follow-up inspections are to be conducted to ensure corrective maintenance has occurred, and all projects must be inspected at	UNM will continue to develop inspection procedures for 100% of all exterior construction projects cumulatively disturbing one (1) or more acres. The new procedures will include determining who is responsible for conducting UNM construction site stormwater quality inspections; determining who has authority to implement enforcement procedures regarding construction stormwater quality at UNM; developing a process for prioritizing sites for inspection and enforcement based on the type of construction activity; inspecting all sites greater than 1-acre at least once per month and follow up on any deficiencies to ensure corrective action; inspecting sites once project team believes final site stabilization is complete, and describing enforcement procedures and	Finalized inspection procedures and the number of site inspections done will be included in the annual report as an appendix.	During the reporting year, 7 (+40% YOY) construction sites were inspected monthly by the respective owners for compliance with the EPA's 2022 Construction General Permit (CGP): 1. UNM – CCAT 2. UNM – CON & PHE 3. UNMH – ACCH Tower 4. UNMH – Children's Psych Center 5. UNMH- Cancer Center 6. UNM – ROTC Track 7. UNM – Police Headquarters

completion for confirmation of final stabilization.	any penalties for repeated non-compliance at a UNM construction site. The procedures will be developed, and inspections will begin no later than December 20, 2016.		These inspections were in addition to the contractor-required inspections, which are scheduled per the 2022 CGP.
5.4. Coordinate with all departments and boards with jurisdiction over the planning, review, permitting, or approval of public and private construction projects/activities within the permit area as required in Part I.D.5.a.(iv); (iv) The permittee must coordinate with all departments and boards with jurisdiction over the planning, review, permitting, or approval of the public and private construction projects/activities within the permit area to ensure that the construction stormwater runoff controls eliminate erosion and maintain sediment on site. Planning documents include, but are not limited to: comprehensive or master plans, subdivision ordinances, general land use plans, zoning codes, transportation master plans, specific area plans, such as sector plans, site area plans, corridor plans, or unified development ordinances.	EHS will continue to coordinate all UNM departments that have a role in construction activities to ensure proper controls are in place to eliminate erosion and reduce the transport of sediment from construction projects. EHS acts in an advisory role for projects under 1 acre and ensures compliance in projects 1 acre or greater. Inform UNM contractors of requirements and review necessary documents (i.e., erosion control plan, SWPP/eNOI application, and fugitive dust permit) during the Construction Review Process. EHS and other UNM departments will continue to oversee UNM contractors, ensuring that they comply with federal law, municipal ordinance, and contractual provisions and implementing a Stormwater Pollution Prevention Plan (SWPPP). EHS and other UNM departments will continue to review site plans and attend pre-construction review meetings to try to ensure consistency with applicable stormwater quality requirements. The plan review must occur prior to construction and focus on construction and post-construction stormwater quality measures that address likely impacts and	UNM will include a summary of regulated construction activities in the Annual Report.	During the reporting period, EHS reviewed project planning and design documents and participated in regular construction project meetings that included construction companies, UNM's Facilities Design & Construction(FDC), UNM's Parking and Transportation Services (PATS), and other UNM departments. EHS provided input to ensure proper controls are in place to eliminate erosion and reduce the transport of sediment from construction project sites.

	public concerns. The site plan review must include an evaluation of opportunities for incorporating green infrastructure (GI).		
5.5. Evaluation of GI/LID/Sustainable practices in site plan reviews as required in Part I.D.5.a.(v): (v) The site plan review required in Part I.D.5.a.(ii)(d) must include an evaluation of opportunities for the use of GI/LID/Sustainable practices and, when the opportunity exists, encourage project proponents to incorporate such practices into the site design to mimic the pre-development hydrology of the previously undeveloped site. For purposes of this permit, pre-development hydrology shall be met according to Part I.D.5.b of this permit. (consistent with any limitations on that capture). Include a reporting requirement of the number of plans that had opportunities to implement these practices and how many incorporated these practices.	EHS will request assessments for incorporating GI/LID into all construction sites disturbing more than or equal to one acre.	EHS will include in the Annual Report the number of opportunities to incorporate GI and the number of times GI has actually been incorporated.	EHS successfully requested project managers from all new construction sites to assess the costs, benefits, and feasibility of incorporating GI/LID. Those assessments are available upon request.
5.6. Enhance the program to include program elements in Part I.D.5.a.(viii) through Part I.D.5.a.(x): (viii) The permittee may use stormwater educational materials	UNM will utilize its own, or when appropriate, publicly available, stormwater educational material to enhance its stormwater program.	EHS participated in the revision/update of the local “NPDES Stormwater Management Guideline for	UNM has used stormwater educational materials provided by the EPA and COA to enhance its stormwater education training and outreach

locally developed or provided by the EPA (refer to http://water.epa.gov/polwaste/npdes/swbmp/index.cUNM's Facilities Management Department, http://www.epa.gov/smartgrowth/parking.htm, http://www.epa.gov/smartgrowth/stormwater.htm), the NMED, environmental, public interest or trade organizations, and/or other MS4s. (ix) The permittee may develop or update existing construction handbooks (e.g., the COA NPDES Stormwater Management Guidelines for Construction and Industrial Activities Handbook) to be consistent with promulgated construction and development effluent limitation guidelines. (x) The construction site inspections required in Part I.D.5.a.(iii) may be carried out in conjunction with the permittee's building code inspections using a screening prioritization process.	Where applicable, UNM will refer to existing local, state, and federal construction handbooks and stormwater management guidelines to ensure consistency and compliance with promulgated construction and development effluent limitation guidelines.	Construction and Industrial Activities Handbook." It is now completed. UNM will include an update on educational materials in its annual report.	materials. UNM has also created its own stormwater education, training, and outreach material. Copies of UNM's education, training, and outreach material are available upon request. No changes were made to the NPDES Stormwater Management Guideline for Construction and Industrial Activities Handbook.
5.7. Describe other proposed activities to address the Construction Site Stormwater Runoff Control Measure:	No additional activities are being proposed at this time. UNM will continue to explore additional activities to address the Construction Site Stormwater Runoff Control Measure.	N/A	N/A

MCM Table 6 – Management of Post-Construction Site Runoff

Requirement	Plan	Goal	Status
6.1. Development of strategies as required in Part I.D.5.b.(ii). (a): (ii) The program must include the development, implementation, and enforcement of, at a minimum: (a) Strategies that include a combination of structural and/or non-structural best management practices (BMPs) to control pollutants in stormwater runoff.	EHS will work with other UNM departments (e.g., FM, PDC, and Parking and Transportation Services) to propose the implementation of design review and construction, as well as operation and maintenance procedures to assure structural and/or non-structural best management practices (BMPs) to control pollutants in stormwater runoff. EHS will propose the development of contractual procedures to ensure the implementation of UNM's SWMP in UNM development and redevelopment projects. By February 20, 2016, EHS will work to develop and adopt design standards, including methodology, to estimate water quality impacts and selection of controls.	Submit draft policies, procedures, guidelines, and protocols regarding stormwater quality upon completion. Submit cumulative changes in UNM's SWMP in the Annual Report.	EHS maintained and enforced the *Stormwater Guidance for UNM Staff and Contractors.* The guidance document provides rules for post-construction sites greater than or equal to one acre. For example, the guidance requires project managers to evaluate GI/LID incorporations into the project. It also requires project managers to disconnect impervious surfaces through the use of permanent BMPs. EHS continues to update it with the latest permit rules as necessary.
6.2. Development of an ordinance or other regulatory mechanism as required in Part I.D.5.b.(ii). (b): (b) An ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable	EHS will work with other UNM departments to develop and adopt design standards, policy, and enforcement mechanisms for requiring on-site management of 90th percentile storm event discharge volume associated with new development sites and 80th percentile storm event discharge volume associated with redevelopment sites.	Submit finalized policies, procedures, guidelines, and protocols regarding Stormwater Quality upon completion of the finalized draft.	EHS continues to work with FDC, and PATS to comply with stormwater rules and implement GI/LID on projects. EHS continues to reevaluate its estimation of the 90th and 80th percentile storm event with

under State, Tribal, or local law. The ordinance or policy must: Incorporate a stormwater quality design standard that manages on-site the 90th percentile storm event discharge volume associated with new development sites and 80th percentile storm event discharge volume associated with redevelopment sites through stormwater controls that infiltrate, evapotranspire the discharge volume, except in instances where full compliance cannot be achieved, as provided in Part I.D.5.b.(v). The stormwater from rooftop discharge may be harvested and used on-site for non-commercial use. Any controls utilizing impoundments that are also used for flood control that are located in areas where the New Mexico Office of the State Engineer requirements at NMAC 19.26.2.15 (see also Section 72-5-32 NMSA) apply must drain within 96 hours unless the state engineer has issued a waiver to the owner of the impoundment. Options to implement the site design standard include, but are not limited to: management of the discharge volume achieved by canopy interception, soil amendments, rainfall harvesting, rain tanks and cisterns, engineered infiltration,			the most recently available data in accordance with the methods in “Estimating Predevelopment Hydrology in the Middle Rio Grande Watershed, New Mexico, EPA Publication Number 832-R-14-007”.

extended filtration, dry swales, bioretention, rooftop disconnections, permeable pavement, porous concrete, permeable pavers, reforestation, grass channels, green roofs and other appropriate techniques, and any combination of these practices, including implementation of other stormwater controls are used to reduce pollutants in stormwater (e.g., a water quality facility). Estimation of the 90th or 80th percentile storm event discharge volume is included in EPA Technical Report entitled “Estimating Predevelopment Hydrology in the Middle Rio Grande Watershed, New Mexico, EPA Publication Number 832-R-14-007”. Permittees can also estimate: Option A: a site-specific 90th or 80th percentile storm event discharge volume using the methodology specified in the referenced EPA Technical Report. Option B: site-specific pre-development hydrology and associated storm event discharge volume using the methodology specified in the referenced EPA Technical Report.			

6.3. Ensure appropriate implementation of structural controls as required in Part I.D.5.b.(ii). (c) and Part I.D.5.b.(ii).(d): (d) The permittee must ensure that the post-construction program requirements are constantly reviewed and revised as appropriate to incorporate improvements in control techniques;	Once developed, the post-construction program requirements will be monitored, reviewed, and revised as appropriate by EHS, with input from other departments, on an annual basis. A process will be put in place by June 20, 2017.	In each annual report to EPA, EHS will report any changes or revisions to UNM's Post-Construction Program.	EHS maintained and enforced the *Stormwater Guidance for UNM Staff and Contractors.*
6.4. Develop procedures as required in Part I.D.5.b.(ii).(e), Part I.D.5.b.(ii).(f), Part I.D.5.b.(ii).(g), and Part I.D.5.b.(ii).(h): (e) Procedure to develop and implement an educational program for project developers regarding designs to control water quality effects from stormwater, and a training program for plan review staff regarding stormwater standards, site design techniques, and controls, including training regarding GI/LID/Sustainability practices. Training may be developed independently or obtained from outside resources, i.e., federal, state, or local experts; (f) Procedures for site inspection and enforcement to ensure proper long-term operation, maintenance, and repair of stormwater	EHS will participate and cooperate in local experts' combined efforts to refine and present stormwater quality educational training for project developers. UNM staff (e.g., PDC, UNM's Facilities Management Department, etc.), including plan reviewers, on construction project teams, will receive such training. EHS, in conjunction with UNM's Facilities Management Department, will inspect campus stormwater management and control systems to assure long-term operation, maintenance, and repair of stormwater management and control systems. UNM contractors are already required to submit the project's as-built plans to PDC upon completion. These plans are stored in PDC's database. The number of such inspections will be mentioned in UNM's Annual Reports to EPA.	Provide a discussion of education and outreach activities geared toward LID implementation in the Annual Report. Provide a discussion of maintenance and inspections of stormwater control features in the Annual Report.	EHS trained 7 persons in charge of new and redevelopment projects on campus about pre and post-construction requirements regarding stormwater rules. New training was unnecessary, as peer-to-peer relationships were maintained with these persons, who demonstrated ongoing knowledge of the requirements and solicited EHS's input on projects as needed. UNM Golf Course contractors and FM's Grounds and Landscaping division staff engaged in

management practices that are put into place as part of construction projects/activities. Procedure(s) shall include the requirement that as-built plans be submitted within ninety (90) days of completion of construction projects/activities that include controls designed to manage the stormwater associated with the completed site (post-construction stormwater management). Procedure(s) may include the use of dedicated funds or escrow accounts for development projects or the adoption by the permittee of all privately owned control measures. This may also include the development of maintenance contracts between the owner of the control measure and the permittee. The maintenance contract shall include verification of maintenance practices by the owner, allows the MS4 owner/operator to inspect the maintenance practices, and perform maintenance if inspections indicate neglect by the owner; (g) Procedures to control the discharge of pollutants related to commercial application and distribution of pesticides, herbicides, and fertilizers where permittee(s) hold jurisdiction over lands not directly owned by that entity (e.g., incorporated city). The procedures must ensure that herbicides and pesticides applicators doing business	UNM's Integrated Pest Management (IPM) manual applies to UNM campus-wide. UNM's Facilities Management Department will review and revise the IPM, provide more IPM-related training to employees, and seek less toxic and equally less expensive new approaches. EHS will work with UNM's Facilities Management Department to review their protocols for applying herbicides and fertilizers and will work to monitor the use of pesticides, herbicides, and fertilizers.		IPM (i.e., Integrated Pest Management) activities as required to maintain licenses. As part of the licensing process, they receive annual training on IPM. They are also required by the New Mexico Department of Agriculture to maintain detailed logs of herbicide and fertilizer applications, which are available for review upon request.

within the permittee's jurisdiction have been properly trained and certified, are encouraged to use the least toxic products, and control use and application rates according to the applicable requirements; and (h) Procedure or system to review and update, as necessary, the existing program to ensure that stormwater controls or management practices for new development and redevelopment projects/activities continue to meet the requirements and objectives of the permit.			
6.5. Coordinate internally with all departments and boards with jurisdiction over the planning, review, permitting, or approval of public and private construction projects/activities within the permit area as required in Part I.D.5.b.(iii) (iii) The permittee must coordinate with all departments and boards with jurisdiction over the planning, review, permitting, or approval of public and private new development and redevelopment projects/activities within the permit area to ensure the hydrology associated with new development and redevelopment sites. Mimic to the extent practicable the pre-development hydrology of the previously undeveloped site,	EHS will work with other UNM departments to develop and adopt design standards, policy, and enforcement mechanisms for requiring on-site management of 90th percentile storm event discharge volume associated with new development sites and 80th percentile storm event discharge volume associated with redevelopment sites. This will be done by December 2015.	A discussion on UNM's progress in developing and adopting such design standards, policy, and enforcement mechanisms will be included in the annual report.	The *Stormwater Guidance for UNM Staff and Contractors* requires that Persons In Charge (PICs) of UNM construction projects (regardless of department) collaborate with EHS to meet stormwater rules. Specifically, PICs must assess GI/LID installation, provide copies of SWPPPs, NOIs, and NOTs, and generally ensure the availability of or provide the resources necessary to comply with stormwater rules. EHS continues to coordinate with FDC, and

except in instances where the pre-development hydrology requirement conflicts with applicable water rights appropriation requirements. For purposes of this permit, pre-development hydrology shall be met by capturing the 90th percentile storm event runoff (consistent with any limitations on that capture), which under undeveloped natural conditions would be expected to infiltrate or evapotranspirate on-site and result in little, if any, off-site runoff. (Note: This permit does not prevent permittees from requiring additional controls for flood control purposes.) Planning documents include, but are not limited to: comprehensive or master plans, subdivision ordinances, general land use plans, zoning codes, transportation master plans, specific area plans, such as sector plan, site area plans, corridor plans, or unified development ordinances.			PATS to ensure development complies with the MS4 permit.
6.6. As required in Part I.D.5.b.(iv), the permittee must assess all existing codes, ordinances, planning documents, and other applicable regulations for impediments to the use of GI/LID/Sustainable practices: (iv) The permittee must assess all existing codes, ordinances, planning documents, and other applicable	Again, UNM does not have formal ordinances or enforcement authority like many other MS4s. EHS will work with other UNM departments to assess facility planning and design procedures.	To remove impediments to GI/LID installation.	EHS continued to work with UNM's Facilities Design & Construction to discuss potential GI/LID features for current and upcoming projects. EHS has reviewed multiple projects during the reporting period,

regulations for impediments to the use of GI/LID/Sustainable practices. The assessment shall include a list of the identified impediments, necessary regulation changes, and recommendations and proposed schedules to incorporate policies and standards to relevant documents and procedures to maximize infiltration, recharge water harvesting, improve habitat, and hydrologically manage stormwater runoff as allowed under the applicable water rights appropriation requirements. The permittee must develop a report of the assessment findings, which is to be used to provide information to the permittee on the regulation changes necessary to remove impediments and allow implementation of these practices.			incorporating infiltration and water harvesting into remodels and new construction.
6.7. As required in Part I.D.5.b.(iv), describe the plan to report the assessment findings on GI/LID/Sustainable practices	Assessment findings will be tracked, recorded, and summarized in each annual report after March 20, 2017.	To identify impediments to GI/LID implementation so they can be remedied.	EHS began tracking GI/LID assessments and requesting data about the largest hurdles to implementing GI/LID. Results show project managers' biggest hurdle is cost and infeasibility, not regulation or policy.
	By June 20, 2017, EHS will calculate and update an estimate of the acreage of	Estimation of campus IAs and DCIA	This process has been completed. There are 576.3

6.8. Estimation of the number of acres of IA and DCIA as required in Part I.D.5.b.(vi): (vi) The permittee must estimate the number of acres of impervious area (IA) and directly connected impervious area (DCIA). For the purpose of his part, IA includes conventional pavements, sidewalks, driveways, roadways, parking lots, and rooftops. DCIA is the portion of IA with a direct hydraulic connection to the permittee's MS4 or a waterbody via continuous paved surfaces, gutters, pipes, and other impervious features. DCIA typically does not include isolated impervious areas with an indirect hydraulic connection to the MS4 (e.g., swale or detention basin) or that otherwise drain to a pervious area.	impervious areas (IA) and directly connected impervious areas (DCIA). UNM may report the acreages of IA and DCIA in a tabular format to EPA and describe the methodology used to calculate the acreages.	removed or added in the Annual Report.	acres of impervious area and 681.7 acres of permeable area at UNM. The majority of UNM's impervious area has a direct hydraulic connection to the MS4 and can therefore be considered DCIA. The assessment report is available upon request. EHS will continue to provide IA and DCIA estimates for upcoming projects.
2.9. Inventory and priority ranking as required in section in Part I.D.5.b.(vii): (vii) The permittee must develop an inventory and priority ranking of MS4-owned property and infrastructure (including public right-of-way) that may have the potential to be retrofitted with control measures designed to control the frequency, volume, and peak intensity of stormwater discharges to and from its MS4. In determining the potential for retrofitting, the permittee	By June 20, 2018, EHS will complete an inventory and rank campus property and MS4 infrastructure that may have the potential to be retrofitted with control measures to improve stormwater quality. Factors such as implementation cost, public safety, maintenance access, geology, depth to groundwater/aquifer, proximity to other infrastructure (e.g., sanitary sewer & septic systems), opportunities for public use, and education should be considered in the priority ranking of potential retrofit projects.	An annual report on what retrofitting work has been completed will be made available beginning in the 2017 Annual Report, and such reporting will continue in each subsequent Annual Report.	This process is ongoing. An inventory of UNM's storm drain system is shown in UNM's Campus Utility Maps, prepared by UNM's FDC Department. In 2015 FM's Engineering Division hired an engineering firm to study these topics. The final reports titled: *UNM Drainage Study: Popejoy Hall and Woodward Lecture Hall Drainage*

shall consider factors such as the complexity and cost of implementation, public safety, access for maintenance purposes, subsurface geology, depth to the water table, proximity to aquifers and subsurface infrastructure, including sanitary sewers and septic systems, and opportunities for public use and education under the applicable water right requirements and restrictions. In determining its priority ranking, the permittee shall consider factors such as schedules for planned capital improvements to storm and sanitary sewer infrastructure and paving projects; current storm sewer level of service, and control of discharges to impaired waters, streams, and critical receiving water (drinking water supply sources);			*issues* and *UNM Drainage Study: Science and Math Learning Center Area Drainage issues* identify and recommend several GI/LID and BMP options to reduce flow and improve water quality. FDC Grounds and Landscaping division has also identified and retrofitted UNM storm drain inlets with smaller-sized grates to reduce the amount of debris flowing into the storm drains.
6.10. Incorporate watershed protection elements as required in Part I.D.5.b.(viii): (viii) The permittee must incorporate watershed protection elements into relevant policy and/or planning documents as they come up for regular review. If a relevant planning document is not scheduled for review during the term of this permit, the permittee must identify the elements that cannot be implemented until that document is revised and provide EPA and NMED with a schedule for incorporation and implementation not	By June 20, 2017, EHS will work to research and develop watershed protection measures and propose their incorporation into UNM policy and planning documents as they come up for review for renewal. Such policy and planning documents will include: (1) A description of UNM's master planning and project planning procedures to control the discharge of pollutants into the MS4. (2) Minimize the amount of impervious surfaces (roads, parking lots, roofs, etc.) within the campus by controlling	All new proposed watershed protection measures will be discussed in the annual report.	UNM's written Stormwater Operations and Maintenance Plan describes UNM's stormwater management practices that minimize water quality impacts on streams. Using resources (such as the engineering reports cited earlier in this report and EPA's *Handbook for Developing Watershed Plans to Restore and Protect Our Waters* and

to exceed five years from the effective date of this permit. As applicable to each permittee's MS4 jurisdiction, policy and/or planning documents must include the following: (a) A description of master planning and project planning procedures to control the discharge of pollutants to and from the MS4. (b) Minimize the amount of impervious surfaces (roads, parking lots, roofs, etc.) within each watershed by controlling the unnecessary creation, extension, and widening of impervious parking lots, roads, and associated development. The permittee may evaluate the need to add an impervious surface on a case-by-case basis and seek to identify alternatives that will meet the need without creating the impervious surface. (c) Identify environmentally and ecologically sensitive areas that provide water quality benefits and serve critical watershed functions within the MS4 and ensure requirements to preserve, protect, create and/or restore these areas are developed and implemented during the plan and design phases of projects in these identified areas. These areas may include but are not limited to critical watersheds,	the creation and expansion of such during development and re-development. (3) Identify any environmentally or ecologically sensitive areas that provide water quality benefits or serve critical watershed functions. Requirements may be needed to protect such if there is a technical basis to justify the actual existence of any such areas on campus. Inviting stakeholder input may be required for identifying sensitive areas. (4) No streams exist on campus. Should UNM acquire and develop a stream-side property, then measures will be taken to disconnect direct discharge to the stream from impervious areas. (5) UNM will seek to avoid hydro-modification of arroyos caused by campus development, including roads, etc. (6) UNM will develop and implement development policies to protect soils and prevent topsoil stripping and soil compaction. (7) UNM will continue to incorporate watershed protection elements into relevant policy and/or planning documents as they come up for regular review.		*Community Solutions for Stormwater Management: A Guide for Voluntary Long-Term Planning*), EHS has identified watershed protection measures that could be incorporated into UNM's master planning documents. Upcoming revisions include FM's engineering design guidelines in addition to the UNM 2040 master plan.

floodplains, and areas with endangered species concerns and historic properties. Stakeholders shall be consulted as appropriate. (d) Implement stormwater management practices that minimize water quality impacts to streams, including disconnecting direct discharges to surface waters from impervious surfaces such as parking lots. (e) Implement stormwater management practices that protect and enhance groundwater recharge as allowed under the applicable water rights laws. (f) Seek to avoid or prevent hydromodification of streams and other water bodies caused by development, including roads, highways, and bridges. (g) Develop and implement policies to protect native soils, prevent topsoil stripping, and prevent compaction of soils. (h) The program must be specifically tailored to address local community needs (e.g., protection of drinking water sources, reduction of water quality impacts) and must be designed to attempt to maintain pre-development runoff conditions.			

6.11. Enhance the program to include program elements in Part I.D.5.b.(xi) and Part I.D.5.b.(xii): (xii) When choosing appropriate BMPs, the permittee may participate in locally-based watershed planning efforts, which attempt to involve a diverse group of stakeholders, including interested citizens. When developing a program that is consistent with this measure's intent, the permittee may adopt a planning process that identifies the municipality's program goals (e.g., minimizing water quality impacts resulting from post-construction runoff from new development and redevelopment), implementation strategies (e.g., adopt a combination of structural and/or non-structural BMPs), operation and maintenance policies and procedures, and enforcement procedures.	UNM will continue to participate in locally-based watershed planning efforts, such as the stormwater Technical Advisory Group (TAG) and the Middle Rio Grande Urban Waters Partnership, and work to incorporate ideas from these efforts into its Stormwater management program.		During the reporting period, EHS participated in TAG meetings and discussions with the Compliance Monitoring Cooperative.
6.12. Describe other proposed activities to address the Post-Construction Stormwater Management in New Development and Redevelopment Measure:	No additional activities are being proposed at this time. UNM will continue to explore additional activities to address the Post Construction Stormwater Management in New Development and Redevelopment Measure.	N/A	N/A

MCM Table 7 – Going Above & Beyond the 6 Established MCMs

Requirement	Plan	Goal	Status
7.1. None.	UNM will continue to exceed the six Minimum Control Measures (MCMs), however feasible.	To further reduce stormwater pollution.	Bradbury Stamm submitted an NOI to the EPA for the new construction of the CCAT. Construction began in FY25. Ritecon submitted an NOI to the EPA for the new construction of the ROTC Track. Construction began in FY25. Jaynes Construction submitted an NOI to the EPA for the new construction of the UNM Police Headquarters. Construction began in FY25 Enterprise Builders submitted NOT to EPA for the CON & PHE. EHS conducted a final inspection to verify NOT compliance; result - pass. The UNM SWMP Administrator attended and completed the National Stormwater Center's seminar, "Extreme Weather Events and Stormwater" (1.5 hours). The UNM SWMP Administrator attended and completed the National Stormwater Center's seminar, "Erosion Estimation" (1.5 hours). The UNM SWMP Administrator attended and completed the National Stormwater Center's seminar, "Controlling Pollutants Using the Six Minimum Control Measures" (1.5 hours). EHS published the Annual SW Report and aired an ad with Daily Lobo + published flyers around campus.

Appendix 1 - Wet Weather Stormwater Monitoring

On the remaining pages, shared data from the TAG (Technical Advisory Group) are displayed to fulfill the cooperative compliance monitoring requirement, as outlined in the permit.

Appendix 2 - Dry Weather Stormwater Monitoring

On the remaining pages, shared data from the TAG (Technical Advisory Group) are displayed to fulfill the cooperative compliance monitoring requirement, as outlined in the permit.