Annual Report Format

National Pollutant Discharge Elimination System Stormwater Program

MS4 Annual Report Format

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) Information

UNIVERSITY OF NEW MEXICO

Name of MS4

Casey	Hall	Environmental Health Manager
Name of Contact Person (First)	(Last)	(Title)

505-277-0305	cbhall4@unm.edu
Telephone (including area code)	E-mail

1801 Tucker Rd 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, 2018 to Jun 30, 2019

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	
Rio Grande NM 2105_50	E. coli	☒ Yes	☐ No	☒ Yes	☐ No
Rio Grande NM 2105_50	Dissolved Oxygen	☐ Yes	☒ No	☒ Yes	☐ No
Rio Grande NM 2105_50	Temperature	☐ Yes	☒ No	☐ Yes	☐ No
		☐ Yes	☐ No	☐ Yes	☐ No

2. B. Continued

Impaired Water	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?

Pet waste (E. coli), 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, E. coli (from pet waste), sediment, chemicals (motor oil, fertilizer).

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.

Recent data indicates a decline in the levels of E. coli in the Middle Rio Grande and that the E. coli impairment is limited to one segment, even though the TMDL applies to all segments within the Albuquerque urban area.

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. 2

D. How many of the sites identified in 4.C did you inspect during this reporting period? 2

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

On average, UNM personnel inspect construction sites once a month during active construction, and within 24 hours after a storm event. Qualified contractors inspect the sites at frequencies required in the Construction General Permit.

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

If Yes, based on what criteria? Sites under active construction during monsoon season

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		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	Contractual Mechanisms to		

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?

Tracking sediment onto the street, Waddles/silt fence issues, General Maintenance at site entrance(s)

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

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. UNM's sewer has none

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?

None

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? None

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

UNM does not have what would be considered outfalls as defined in Part VII of the permit. UNM has identified discharge points into major drainage channels in the MS4, and monitors those according to the schedule in the SWMP and IDDE

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? 0

K. Of those illicit discharges/illegal connections that have been discovered or reported, how many have been eliminated? 0

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

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?

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 O&M practices are in place for street sweeping and trash pickup.

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?

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?

UNM Grounds and Landscaping staff receive training on stormwater management. UNM contractors are required obtain and maintain training and certification in stormwater management.

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?

N/A

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 UNM projects that disturb land are reviewed.

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://srs.unm.edu/construction-safety/media/docs/srs-contractor-requirements.pdf

G. How many development and redevelopment project plans were reviewed during the reporting period to assess impacts to water quality and receiving stream protection? 2

H. How many of the plans identified in 7.G were approved? 2

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

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? N/A

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? N/A

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? As needed

8. Program Resources

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

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

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 Government 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
Cooperative	stormwater 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 Locations
Example: E. coli	2003	Weekly April–September	20
E. coli	2016	Schedule defined in monitorin	2

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.

Monitoring has only occurred over a short period of time (3 years, 6 samples). Trends have not been established.

10. Additional Information

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 imprisonment for knowing violations.

☐ 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, Senior VP Finance & A	10/17/19
		Name of Certifying Official, Title	Date (mm/dd/yyyy)

CONSTRUCTION SITE STORMWATER RUNOFF CONTROLS			
Permit Activity	**Proposed Plan**	**Measurable Goal**	**Status**
1.1 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;	Safety & Risk Services (SRS), Facilities Management (FM) and the 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. SRS Contractor requirements for new and remodeled UNM facilities requires: 1. For projects disturbing > 1 acre of soil or pavement: prior to breaking ground, contractor must make required EPA notifications (e.g., NOI and NOT) obtain an NPDES permit or waiver, and develop and comply with any required site-specific Stormwater Pollution Prevention Plan (SWPPP). SRS may request revision of contractor's SWPPP. UNM may with-hold payment for contractor non-compliance. 2. Any required stormwater controls must be regularly inspected & maintained over project duration. 3. Washing out construction equipment on-site a. Permitted in FM-approved pit or dumpster locations for biodegradable and non-hazardous water-based material (e.g., latex paints, concrete) wash rinsate. Rinsate of water-based paints may also be washed down the sanitary sewers if FM allows. b. Oil- & solvent-based materials washing rinsate must be properly disposed off-site. c. No on-site disposal of unused materials other than clean soil with FM approval. 4. Trash Control – all exterior trash that may become wind-blown or wash off-site with storm water must be picked up at least daily. 5. As the site operator, the constructor (GC or CM, etc.) will be responsible for all EPA Construction General Permit	Revisions to existing policy, design or construction standards and guidelines; or 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.	SRS has reviewed and proposed revisions to its Design Guidelines. During this reporting period, SRS began doing a review and making revisions to the UNM Construction Safety Manual. This process is completed.

	(CGP) requirements, e.g., but not limited to meeting & maintaining construction site stormwater quality discharge requirements, SWPPPs, NOIs, BMPs, inspections, record-keeping, reporting, monitoring, NOTs, etc. until UNM formal acceptance of the completed project. SRS design guidelines (Rev. April 2012) require that: 1. Roof drains should direct water into plantings or be used for other beneficial reuses whenever possible before discharge to the storm sewer. 2. For projects disturbing greater than1 acre of soil or pavement, the designer shall allow space for, or design in, sufficient stormwater retention to minimize discharge of sediment laden stormwater during construction. For final site design, retain on-site all storm water discharge in excess of natural pre-development discharges for up to a 2-inch rain event or whatever the current CABQ Development Process Manual (DPM) requires. FM's Environmental Services Design & Development Standard Requirements require that roof drains not drain out onto walkways and that water should be harvested if possible or roof drains directed to the storm drains.		
1.2. 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);	• (See proposed activities listed for permit activity 1.1 above). • SRS and its sister departments will continue to 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.	• Revisions to existing policy, design or construction standards and guidelines; or 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.	During the reporting period, SRS reviewed 2 SWPPPs and 2 fugitive dust permit for the Physics and Astronomy and Interdisciplinary Sciences Building and Johnson Center. These have been filed at SRS. During the review period, SRS identified and reviewed site plans for

(c) Requirements for construction site operators to control waste such as, but not limited to, discarded 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.cfm?action=browse&Rbutton=detail&bmp=117); (d) Procedures for site plan review which incorporate consideration of potential water quality impacts. The site plan review must be conducted prior to commencement of construction activities, and include a review of the site design, the planned operations at the construction site, 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 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 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	• SRS and its sister departments will continue to oversee UNM contractors to ensure that they comply with federal law, municipal ordinance and contractual provisions and implementing a Stormwater Pollution Prevention Plan (SWPPP). • FM's Environmental Services Design & Development Standard Requirements prohibits washing of concrete trucks into an uncontrolled area, and requires removal of construction debris, including concrete tailings from site. • SRS and its sister departments will continue to review site plans and attend pre-construction review meetings to try to ensure consistency with applicable storm water 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. Site plan review must include 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 submittal to the EPA. Public comments were reviewed and addressed accordingly. The SRS Department continues involving other UNM departments, e.g., FM, PDC, etc., 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 conducting UNM construction site stormwater quality inspections; determining who has	• SRS and its sister departments will maintain 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 the annual report as an appendix. • SRS will maintain records of the number of trainings offered on the SWMP and general storm water pollution prevention (P2) basics, and will report these in the annual report.	the above mentioned projects for opportunities for incorporating GI. Inspection checklists have been developed for inspecting construction sites. The inspections are conducted by SRS personnel at least once a month, and within 24 hours after a storm event of 0.25" or greater. The UNM SWMPP was finalized and sent to PDC and FM and is being implemented. Training material on strormwater management and pollution prevention was finalized and training was provided to the UNM Grounds and Landscaping Staff. During this reporting period, 2 construction project sites (Physics and Astronomy and Interdisciplinary Sciences Building and Johnson Center were inspected for stormwater management compliance. Inspection procedures for exterior construction sites less than 1-acre have been completed and are incorporated into this SWMP and included in the annual report as an appendix. No training was provided this reporting period, but trainings have begun for the next reporting period.

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 prevention plan for construction sites within the permitee'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;	authority to implement enforcement procedures regarding construction stormwater quality at UNM; developing a process for prioritizing sites for inspection and enforcement based on type of construction activity; inspecting all sites greater than 1-acre at least once per year 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 SRS 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, any enforcement letters & documents.		
1.3. 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	• 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: (1) 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;	• Finalized inspection procedures and the number of site inspections done will be included in the annual report as an appendix.	Inspection checklists have been developed for inspecting construction sites. The inspections are conducted by SRS personnel at least once a month, and within 24 hours after a storm event. Written procedures on how the inspections should be conducted have

compliance or enforcement action. Follow-up inspections are to be conducted to ensure corrective maintenance has occurred; and, all projects must be inspected at completion for confirmation of final stabilization.	developing a process for prioritizing sites for inspection and enforcement based on type of construction activity; inspecting all sites greater than 1-acre at least once per year 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 procedures will be developed and inspections began no later than December 20, 2016.		been completed and are incorporated into this SWMP.
1.4. 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 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 plan, zoning code, transportation master plan, specific area plans, such as sector plan, site area plans, corridor plans, or unified development ordinances.	UNM will continue to coordinate all UNM departments who 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 that disturb more than 1-acre on campus. • 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. • SRS and its sister departments will continue to oversee UNM contractors to ensure that they comply with federal law, municipal ordinance and contractual provisions and implementing a Stormwater Pollution Prevention Plan (SWPPP). • SRS and its sister 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. Site plan review must include evaluation of opportunities for incorporating green infrastructure (GI).	UNM will include a summary of regulated construction activities in the Annual Report.	During the reporting period, SRS reviewed project planning and design documents and participated in regular construction project meetings that included construction companies, Facilities Management (FM), Planning, Design and Construction (PDC), Parking and Transportation Services (PATS) and other UNM departments. SRS provided input to ensure proper controls are in place to eliminate erosion and reduce the transport of sediment from construction project sites. Examples of projects included the new Physics, Astronomy and Interdisciplinary Science building, Johnson Center.
1.5. Evaluation of GI/LID/Sustainable practices in site plan reviews as required in Part I.D.5.a.(v):	• SRS and its sister departments will continue to review site plans and attend pre-construction review meetings to try to ensure consistency with applicable stormwater	SRS will include in the Annual Report the number of opportunities to	During the reporting period, SRS reviewed 3 construction projects (Physics, Astronomy and

(v) The site plan review required in Part I.D.5.a.(ii)(d) must include an evaluation of opportunities for 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.	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. Site plan review must include evaluation of opportunities for incorporating green infrastructure (GI).	incorporate GI and the number of times GI has actually been incorporated	Interdisciplinary Science building, Johnson Center and Elks Lodge site plans for opportunities to incorporate GI. Of these projects Physics, Astronomy and Interdisciplinary Science incorporated GI/LID design elements.
1.6. 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 storm water educational materials locally developed or provided by the EPA (refer to http://water.epa.gov/polwaste/npdes/swbmp/index.cfm, 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.	• UNM will utilize its own, or when appropriate, publicly available stormwater educational material to enhance its stormwater program. • 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.	SRS participated in the revision/update of the local "NPDES Storm Water Management Guideline for Construction and Industrial Activities Handbook". It is now completed. UNM will include an update in its annual report.	UNM has used stormwater educational materials provided by the EPA and CABQ to enhance its stormwater education training and outreach material. 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.

1.7. 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.	Additional proposed activities will be reported in the annual report.	
POST-CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND RE-DEVLEOPMENT			
Permit Activity	**Proposed Plan**	**Measurable Goal**	
2.1. 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 which include a combination of structural and/or non-structural best management practices (BMPs) to control pollutants in stormwater runoff.	• SRS will work with its sister departments (e.g. FM, PDC and Parking and Transportation Services) to propose 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. • SRS will propose the development of contractual procedures to ensure implementation of UNM's SWMP in UNM development and redevelopment projects. • By February 20 2016, SRS will work to develop and adopt design standards, including methodology, to estimate water quality impacts and selection of controls.	• Submit draft policies, procedures, guidelines, protocols regarding Storm Water Quality upon completion. • Submission of cumulative changes in UNM's Storm Water Management Program in the Annual Report.	The SRS Design guidelines state that for projects disturbing greater than1 acre of soil or pavement, the designer shall allow space for, or design in, sufficient storm water retention to minimize discharge of sediment laden storm water during construction. For final site design, retain on-site all storm water discharge in excess of natural pre-development discharges for up to a 2-inch rain event or whatever the current CABQ Development Process Manual (DPM) requires. UNM's Stormwater Operations and Maintenance Manual addresses non-structural BMPs to control pollutants in stormwater runoff. UNM is not proposing additional draft policies, procedures, guidelines, protocols regarding Storm Water Quality at this time. Where applicable, UNM will utilize guidance from the April 2002 EPA Manual, *Urban Stormwater BMP Performance Monitoring*, on how to estimate water quality impacts of BMPs, when feasible.

2.2. 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 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 not limited to: management of the discharge volume achieved by canopy interception, soil amendments, rainfall harvesting, rain tanks and cisterns, engineered infiltration, extended filtration, dry swales, bioretention, roof top 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	• SRS will work with its sister departments (FM, PDC and Parking and Transportation Services etc.) to develop and adopt design standards, policy and enforcement mechanisms for requiring on-site management of 90th percentile (0.44-inch) storm events discharge volume associated with new development sites and 80th percentile storm event discharge volume associated with redevelopment sites.	• Submission of finalized policies, procedures, guidelines, protocols regarding Stormwater Quality upon completion of finalized draft.	SRS continues to work with FM, PDC, and PATS to develop design standards on current and upcoming construction projects.

other stormwater controls 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 methodology specified in the referenced EPA Technical Report. Option B: a site specific pre-development hydrology and associated storm event discharge volume using methodology specified in the referenced EPA technical Report.			
2.3. Implementation and enforcement, via the ordinance or other regulatory mechanism, of site design standards as required in Part I.D.5.b.(ii).(b).	• UNM, unlike municipalities, does not have formal enforcement authority through ordinances. UNM may use contractual mechanisms if necessary, and does regular consultation with contractors, to ensure compliance with UNM design guidelines. Therefore, UNM will not pursue a separate monitoring and enforcement mechanisms of UNM design standards and guidelines.		SRS continues to consult with contractors on a regular basis to ensure compliance with UNM design guidelines.
2.4. 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 SRS, 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, SRS will report any changes/revisions to UNM's Post-Construction Program.	UNM's post construction activities are outlined in UNM's Stormwater Operations and Maintenance plan. The plan was developed in 2017, and is available upon request. Revisions to the plan will be noted in future annual reports.
2.5. 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):	• SRS 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, FM, etc.), including plan	• Provide discussion of education and outreach activities geared toward	SRS is still exploring available options for presenting stormwater quality educational training for project managers.

(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 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 within the permittee's	reviewers, on construction project teams will receive such training. • SRS in conjunction with FM 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 project 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. • UNM's Integrated Pest Management (IPM) manual applies to UNM campus wide. FM will review and revise the IPM, provide more IPM related training to employees, seek less toxic and equally less expensive new approaches. SRS will work with FM to review their protocols for applying herbicides and fertilizers and will work to monitor the use of pesticides, herbicides, and fertilizers.	LID implementation in the Annual Report. • Discussion of maintenance and inspections of stormwater control features in Annual Report.	As part of the preventive maintenance program, the UNM Facilities Management department inspects stormwater management and control systems to assure long-term operation, maintenance and repair. SRS has developed inspection checklists used to inspect campus stormwater management and control systems to assure long-term operation, maintenance and repair of storm water management and control systems. UNM Golf Course contractors and FM Grounds and landscaping staff engaged in IPM activities are 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 application.

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.			
2.6. 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, 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,	• SRS will work with its sister departments (FM, PDC and Parking and Transportation Services etc) to develop and adopt design standards, policy and enforcement mechanisms for requiring on-site management of 90th percentile (0.44-inch) storm events 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 SRS Design guidelines refer to the City of Albuquerque Development Process Manual specifications for stormwater discharge from construction sites.

subdivision ordinances, general land use plan, zoning code, transportation master plan, specific area plans, such as sector plan, site area plans, corridor plans, or unified development ordinances.			
2.7. 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 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, habitat improvement, and hydrological management of 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, of the regulation changes necessary to remove impediments and allow implementation of these practices.	• SRS will work with PDC, FM and other departments to assess facility planning and design procedures to identify impediments for the incorporation of GI/LID approaches including infiltration, recharge, water harvesting, habitat improvement and/or hydrological management to improve post-construction stormwater quality.	• An update will provided in the annual report.	SRS continued to work with FM and PDC to discuss potential GI/LID features for current and upcoming projects. The Physics, Astronomy & Interdisciplinary Sciences building incorporated GI features, such as roof drainage into landscaped areas.
2.8. 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 reported in an annual report by March 20, 2017.		Assessment findings will continue to be reported in the annual reports.
2.9. 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	• By June 20, 2017, SRS will calculate and update an estimate of acreage of 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.	• Estimation of campus IAs and DCIA removed or added in the Annual Report.	This process has been completed. There are 576.3 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.

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.			The assessment report is available upon request. SRS will continue to provide IA and DCIA estimates for upcoming projects.
2.10. 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 shall consider factors such as the complexity and cost of implementation, public safety, access for maintenance purposes, subsurface geology, depth to 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);	• By June 20, 2018, SRS 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 done will be made beginning in the 2017 Annual Report to the EPA, and such reporting will continue in each subsequent Annual Report to the EPA.	This process is ongoing. An inventory of UNM's storm drain system is shown in UNM's Campus Utility Maps prepared by FM. In 2015 FM Engineering hired and engineering firm to do studies. The final reports titled: *University of New Mexico Drainage Study: Popejoy Hall and Woodward Lecture Hall Drainage issues* and *University of New Mexico Drainage Study: Science and math Learning Center Area Drainage issues* identify and recommend several LID/BMP options to reduce flow and improve water quality. FM Grounds and Landscaping has also identified and retrofitted UNM storm drain inlets with smaller size grates to reduce the amount of debris flowing into the storm drains.
2.11. 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	By June 20, 2017 SRS 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: • A description of UNM's master planning and project planning procedures to control the discharge of pollutants into the MS4.	• 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 to streams. Using resources such as the engineering reports cited earlier in this report and EPA's *Handbook for*

be implemented until that document is revised, and provide to EPA and NMED a schedule for incorporation and implementation not 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 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, 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.	• Minimize the amount of impervious surfaces (roads, parking lots, roofs, etc.) within the campus by controlling the creation and expansion of such during development and re-development. • Identify any environmentally or ecologically sensitive areas that provides 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. • No streams exist on campus. Should UNM acquire and develop stream-side property, then measures will be taken to disconnect direct discharge to the stream from impervious areas. • UNM will seek to avoid hydro-modification of arroyos caused by campus development, including roads, etc. • UNM will develop and implement development policies to protect soils, prevent topsoil stripping and soil compaction. • UNM will continue to incorporate watershed protection elements into relevant policy and/or planning documents as they come up for regular review.		*Developing Watershed Plans to Restore and Protect Our Waters* and *Community Solutions for Stormwater Management: A Guide for Voluntary Long-Term Planning,* SRS has identified watershed protection measures that could be incorporated into UNM's master planning documents. However, no UNM policy and planning documents came up for review and renewal during the reporting period. Regardless, some watershed protection measures such as minimizing the amount of impervious surfaces, implementing stormwater management practices are already being implemented.

(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 to drinking water sources, reduction of water quality impacts) and must be designed to attempt to maintain pre-development runoff conditions.			
2.12. 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., minimize 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, SRS participated in TAG meetings and discussions with the Compliance Monitoring Cooperative committee and the Stormwater Quality Team.
2.13. 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.	Additional proposed activities will be reported in the annual report.	No proposed activities were included in the annual report.

POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

Permit Activity	Proposed Plan	Measurable 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 storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance. The permittee must also develop a tracking procedure and ensure that employee turnover is considered when determining frequency of training; (b) Maintenance activities, maintenance schedules, and long term inspections procedures for structural and non-structural storm water 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	• UNM will continue to implement, review and enhance pollution prevention practices. When possible, UNM will implement new source control procedures to limit the discharge of pollutants from the campus MS4. • As required, FM 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 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. • FM'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 3 months by FM and cleaned if necessary (See Table 1); and c) continue FM's leading source control program of street and hard-scaping sweep and daily (M-F) litter pickup on campus. • UNM maintains a Spill Prevention, Countermeasure and Control Plan (SPCCP) to address the risks from oil tanks larger than 55 gallons. UNM takes measures to insure that parties responsible for a spill on campus take reasonable steps to control and minimize threats to human health and the environment.	• Submission of annual progress included in Annual Report.	Stormwater Management training was provided to UNM Grounds and Landscaping personnel during the July 1st 2018 to June 30th 2019 reporting period. No training was offered during this reporting period, but there is training scheduled for December 2019. UNM continued implementation of its SPCC Plan during the reporting period. UNM has prepared a written Stormwater Operation and Maintenance manual that includes the required elements listed.

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.	• Potential discharges will be controlled through implementation of spill prevention practices, self-inspections, and employee training. FM'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): (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 to stormwater quality; (c) Develop or modify 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 existing street sweeping program. Assess possible benefits from changing frequency or timing of sweeping activities or utilizing different equipment for sweeping activities;	(See Proposed Plan for Permit Activities listed in 3.1 above). In addition, UNM will do the following: • UNM'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 hazmat, by June 2017. This will include a list of opportunities for recycling substances. Also, standard operating procedures will address the removal of sediments, debris, floatables and litter including pet wastes. • By June 20, 2017, UNM will re-assess existing flood control infrastructure for the potential to retro-fit it with additional water quality enhancement features. • UNM'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 shall be inspected once every 3 months by FM and cleaned if necessary.	• Submission of annual progress updates in Annual Report.	FM continued routine O&M operations for street sweeping, trash collections, recycling. Disposal of hazardous chemicals and used oils from maintenance shops were done through SRS 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 the AMAFCA. No retrofit evaluations conducted during this reporting period.

(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 majority of de-icing material, roadway receives excess litter, roadway receives greater loads of oil and grease); (f) Develop or revise existing standard operating procedures for 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 revised 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 review to ensure new and/or innovative practices are implemented where applicable. (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 method 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 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 a MSGP NOI ID for each facility as applicable.	• UNM does not have operations within our campus jurisdiction that would normally be categorized as industrial or that have the potential for high risk runoff.		
3.4. Describe other proposed activities to address the Pollution Prevention/Good Housekeeping for Municipal/permittee Operations Measure:	• No additional activities are being proposed at this time. UNM will continue to explore additional activities to address the Pollution Prevention/Good Housekeeping for Municipal/permittee Operations Measure.	• Additional proposed activities will be reported in the annual report.	No additional activities reported in the annual report.

INDUSTRIAL AND HIGH RISK RUNOFF

Permit Activity	Proposed Plan	Measurable Goal
4.1. Ordinance (or other control method) 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 storm water discharges associated with industrial activity and the quality of storm water 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 permittees jurisdiction, that permittee may certify that this program element does not apply.	• UNM does not have operations within our campus jurisdiction that would normally be categorized as industrial or that have the potential for high risk runoff.	
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 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	• UNM does not have operations within our campus jurisdiction that would normally be categorized as industrial or that have the potential for high risk runoff.	

MS4. (Note: If no such facilities are in a permittees 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;		
4.4. Include requirements in Part I.D.5.d.(iv): (iv) The permittee must modify the following as necessary: (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 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;		
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;		

(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 (2) or more outfalls with substantially identical effluents, and B. Demonstration by the facility that the stormwater outfalls are substantially identical, using one (1) 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 at 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:		

ILLICIT DISCHARGES AND IMPROPER DISPOSAL

Permit Activity	Proposed Plan	Measurable Goal	Status
5.1. 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;	(see Proposed Plan listed for permit Acitivity 5.2 below) • UNM completed a campus utility map in 2013 which includes its storm sever map. UNM will continue to revise and update its storm sewer system map as necessary.	• Updates to the map will be reported in the annual report.	UNM continued to implement its activities to detect and eliminate illicit discharges, and also revised its written IDDE plan. UNM does not have what would be considered outfalls as defined in Part VII of the permit. UNM has identified discharge points into major drainage channels.
5.2. Ordinance (or other control method) 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 mechanism, non-stormwater discharges into the MS4, and implement appropriate enforcement procedures and actions;	• To the extent possible, SRS will work with other departments to develop mechanisms to control, non-stormwater discharges into the MS4, and implement appropriate enforcement procedures and actions.		UNM's Construction Safety Manual and the SRS design guidelines and contractor requirements prohibit non-stormwater discharges into the MS4. UNM has implemented an IDDE program which regulates non-stormwater discharges into the MS4. UNM does not have formal regulatory or enforcement power, but can utilize contractual and employee disciplinary mechanisms to discourage non-stormwater discharges from contractors and employees respectively.
5.3. Develop and implement a IDDE plan as required in Part I.D.5.e.(i)(c): (c) Develop and implement a plan to detect and address non-stormwater discharges, including illegal dumpling, to	• UNM continues to implement efforts to detect and eliminate illicit discharges and improper disposal that may impact the quality of stormwater discharged from the campus. IDDE efforts at UNM have historically identified and eliminated at least one non-	• SRS will develop and implement an IDDE program. • If the systematic IDDE process identifies a significant illicit	A third party contractor developed an IDDE plan on September 13, 2017. IDDE inspections were conducted at facilities identified as a potential source for illicit discharges.

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 test 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.	stormwater discharge to our MS4. SRS Department investigates IDDE problems within 48-hours of being reported. UNM then eliminates illicit discharges or improper disposal on campus within 30 days. If more time is needed then SRS Department develops an elimination schedule within six months. • In addition, any newly discovered non-stormwater discharges will be assessed for their potential impact to the Rio Grande. SRS will review compliance records to check for similar incidents and will prioritize preventing repeat issues by increased awareness. SRS will manage UNM's IDDE Program and maintain maps applicable to the campus. • SRS will check both wet and dry stormwater discharges. Initial assessments of stormwater quality will occur by visual and olfactory methods. If suspicious water quality conditions are encountered visually, then water quality samples may be tested with field instrumentation, e.g., conductivity, pH, temperature and perhaps dissolved oxygen or turbidity. • If visual and field instrumentation assessment is unsatisfactory and other contamination is suspected (e.g., heavier than normal oil sheen), 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	discharge or improper disposal on campus, then that finding and a brief explanation of any potential hazard will be posted on a SRS website page to inform any interested members of the campus or local communities. • SRS 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 program and incorporated by reference into this SWMPP.	

	the above information to try to track back to the source on campus or where up-gradient contamination enters campus. UNM will notify up-gradient MS4 entities if we encounter contamination from their jurisdiction entering campus.		
5.4. 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, SRS 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 SWMPP. Copies are available upon request. The SRS 27/7 Duty Officer pager number is posted on the SRS website.
5.5. 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 SRS, which will conduct an investigation or notify the appropriate parties.	• Complaints from the public will be tracked, recorded and reported.	SRS has a 24/7 Duty Officer program where complaints can be reported.
5.6. 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.	• SRS 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 immediate cessation of illicit discharges upon confirmation of responsible parties.	• An update will be provided in the annual report.	A review of the investigation process was completed as part of the updates to the IDDE plan and is included in the IDDE plan. 3 incidents were noted and investigated during the reporting period.
5.7. 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	• SRS will maintain a log of complaint records from the last permit term and target source reduction efforts to repeat discharge incidents.	• An update will be provided in the annual report.	3 incidents were reported to SRS during the time period and none were repeat incidents.

different locations. (Applicable only to class A and B permittees)			
5.8. 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) 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 develop in previous permit term.	• The screening will occur as part of the IDDE program by SRS. Screening will be done according to the schedule in the pemit.	• An update will be provided in the annual report.	
5.9. 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 recycle, reuse, or proper disposal, and to collect household hazardous waste materials (including paint, solvents, fertilizers, pesticides, herbicides, and other hazardous materials) for recycle, 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:	• FM'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 hazmat. This will include a list of opportunities for recycling substances. Also standard operating procedures will address the removal of sediments, debris, floatables and litter including pet wastes. This will be completed by June 20, 2017.	• The annual report will include a discussion on any updates to an existing FM O&M program and SOPs or development of new program and SOPs.	UNM's Stormwater O&M Program contains a description of waste management operations. FM continued to operate a waste collection program that includes recycling. SRS continued to operate its hazardous waste collection and disposal program across campus.

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.			
5.10. 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: (a) Where 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 insure 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.	• UNM's SRS department has developed and regularly updates spill prevention and response programs, and has staff trained to respond to chemical spills. SRS also has a 27/4 Duty Officer pager number where all spills are reported. A complete review of these programs will be completed by June 20, 2017.	• Responses to spills that have the potential to impact water quality will be reported in the annual report.	SRS maintained a 24/7 spill response team and an on-call spill response contractor. SRS also maintained the 27/7 Duty Officer program through which spills and other emergencies can be reported to SRS personnel. UNM also updated its SPCC plan during the reporting period. The updated plan is available upon request. There were no updates to the spill prevention and response program during the reporting period. During the reporting period, there was no response to spills that have the potential to impact water quality.
5.11. 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;	• SRS will look at the different subbasins and where feasible, divide them into different assessment areas. These assessment areas may be ranked in order of priority for screening purposes.	• An update on progress will be included in the annual report.	UNM's IDDE plan has identified locations throughout campus where screening for illicit discharges will take place.

(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; (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 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."			
5.12. 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.	• Additional proposed activities will be reported in the annual report.	

CONTROL OF FLOATABLES DISCHARGES

Permit Activity	Proposed Plan	Measurable Goal	Status
6.1. 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); and	• 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 storm water. These activities are continuous. • Furthermore, UNM has installed grates in stormwater inlets across campus to control floatables discharge. • PDD will continue to track and report the estimated volume of floatables and trash removed from our control facilities. Beginning in June 2017, FM 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 discussion of volume and type of trash removed in Annual Reports.	UNM grounds and landscaping personnel continued implementing cleaning and maintenance on stormwater inlets that trap floatables and other debris. FM has identified a list of storm drain inlets that are cleaned at least quarterly. FM does street sweeping every day and each UNM street is swept on average twice a week. The frequency is sweeping reduces in the winter months. The amount of debris collected from street sweeping is still to be determined.

WASTE COLLECTION PROGRAMS

Permit Activity	Proposed Plan	Measurable Goal	
	• UNM carefully collects and disposes of all wastes that could be hazardous to storm water quality. For instance, the SRS Department picks up and properly disposes of UNM's hazardous wastes in compliance with RCRA requirements. SRS, FM 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 FM Automotive Center. UNM is expanding its waste collection program to include fats, oils and greases. UNM continues to coordinate waste collection efforts amongst departments.		
6.2. 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.	• UNM does not own or operate any major stormwater quality control facilities. FM recycling will continue to track and report the estimated volume of trash and recyclable materials collected from campus.	The progress and estimated volume of trash and recyclable materials will be reported in the annual report.	The volume of trash and recyclable materials for the reporting period is still being determined.
6.3. 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.	Additional proposed activities will be reported in the annual report.	No additional activities reported.

PUBLIC EDUCATION AND OUTREACH ON STORMWATER IMPACTS

Permit Activity	Proposed Plan	Measurable Goal	
7.1. 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. (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 storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water 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	• UNM is actively involved in providing public education and outreach regarding storm water impacts in the Albuquerque area watershed. UNM's efforts are aimed to educate the public about storm water pollution and how citizens can control the impact of stormwater pollution. Some activities that UNM is involved in include: (1) posting stormwater information on the SRS Department website; (2) publishing stormwater information in the UNM Today, UNM New Minute or The Daily Lobo publications; and (3) providing stormwater training to UNM staff. The information that UNM provides includes the proper handling, disposal and recycling of used motor vehicle fluids, household hazardous wastes, grass clippings, car wash water, use of fertilizers, pesticides and herbicides, oil and toxics on roadways and the steps to report illicit discharges and improper disposal. Further, UNM educates pet owners about proper disposal of pet wastes. • UNM's SRS Department works with FM to maintain pet waste collection stations on its Main Campus. SRS also educates owners and operators of UNM-related facilities regarding their responsibility to control pollutants in stormwater discharges from their property to the MS4 by including stormwater pollution prevention training to UNM Building Coordinators and staff. SRS is also including stormwater education in its Basic Annual Safety Training required to be taken annually by all UNM employees.	• Discussion of additional education and outreach activities performed by UNM staff will be provided in the Annual Reports. • Outreach efforts will continue to be summarized in the Annual Reports.	SRS has developed a written education and outreach program with is incorporated into this SWMP by reference. During the reporting period, SRS continued to maintain storm drain caps on storm drain inlets across campus with the message "No Dumping, only Rain in the Drain." SRS participated in "Welcome back days" at the beginning of the UNM academic semester, and handed out fliers with stormwater education literature. In April 2019, SRS had a booth at the UNM Sustainability Expo. SRS posted an advertisement in the Daily Lobo newspaper publication for stormwater pollution prevention awareness. SRS continues to attend Welcome Back Days, where stormwater educational materials are distributed to students, faculty, and staff.

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; (e) Use tailored public education program, 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.			

7.2. 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. (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. Example of existing programs include:			

(a) Classroom education on stormwater; A. Develop watershed map to help students visualize 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 trainings 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 storm water for home residences. **7.3. Describe other proposed activities to address the Public Education and Outreach on Stormwater**			

Impacts Measure:			

PUBLIC INVOLVEMENT AND PARTICIPATION

Permit Activity	Proposed Plan	Measurable Goal	Status
8.1. 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 to 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. Permittee 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 which involves public participation and where necessary intergovernmental 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 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;	• UNM continues to welcome public participation in its SWMP. The SRS Department continues involving other UNM departments, e.g., FM, OCP, etc., as stakeholders in the development and revision of UNM's SWMP. UNM also participates in local Albuquerque area public forums where active public involvement occurs, e.g., the Technical Advisory Group on stormwater issues. • SRS Department regularly trains and updates other UNM Departments about stormwater issues and solicits input and participation.	Discussion of public input and their comments will be provided in the Annual Report.	UNM requested public participation in its SWMP. The SRS Department continues involving other UNM departments, e.g., FM, OCP, etc., as stakeholders in the development and revision of UNM's SWMP. SRS also participated in local Albuquerque area public forums where active public involvement occurs, e.g., the Technical Advisory Group on stormwater issues.

(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 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.			
8.2. 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 provided public notice of its plan to submit a NOI and SWMP to the EPA. The notice was published in the Albuquerque Journal. The draft NOI and SWMP were published on the SRS website, with copies available at the Zimmerman Library, and the public was allowed 30 days to submit written comments.		
8.3. 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 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.			
8.4. As required in Part I.D.5.h.(viii) provide the internet site (or website) where the SWMP document,	SRS will publish UNM's SWMP and Annual Reports on its website and provide a forum to seek and address input from the public.		

Annual Reports, and other documents will be available to the public: (viii) The permittee must provide public accessibility of the Storm Water 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 in the agenda of in a regularly scheduled city council meeting, etc.) on the NOI, SWMP, and Annual Reports. (See Part III B)			
8.5. 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. Example of existing programs include: Adopt-A- Stream Programs; Attitude Surveys; Community Hotlines (e.g. 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.			
8.6. Describe other proposed activities to address the Public Involvement and Participation Measure:			

DISCHARGES TO IMPAIRED WATERS

Permit Activity	Proposed Plan	Measurable Goal	Status
2.b) 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 directly to one or more water quality impaired water bodies where a TMDL has not yet 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 full description of such activities).	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 our 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 source 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. a) **Pet Waste Stations** - UNM's campus is open to the public and people do walk their dogs on campus. This activity is centered around the green spaces, e.g., the Duck Pond on the Central Campus and Golf Course on North Campus. FM has installed and maintains pet waste disposal bag dispensers on the east and west sides of the Duck Pond area. The North Campus Neighborhood Association has 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. b) **Bird Controls -** UNM continues bird control efforts, especially related to roosting pigeons on UNM buildings. Bird control efforts range from netting at Coronado dormitory trash storage area, equipment bird skirting at the 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 roof tops or wherever there may be a roosting problem. c) **Street and Sidewalk Sweeping** - UNM makes a great effort to keep the campus grounds beautiful. FM 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	Submission of water quality monitoring results in DMRs and Annual Reports.	UNM entered into a monitoring cooperative and signed an intergovernmental agreement with several agencies during the reporting cycle. It also provided the EPA a monitoring plan and certification to start monitoring stormwater. Monitoring results (DMRs) will be reported by one of the co-permittees (AMAFCA) on behalf of the cooperative.

	to protect stormwater quality from contaminants, including bacteria laden animal wastes on hard-scaping. d) **Trash & Litter Controls -**The local bacterial tracking study also indicated that humans are one of the smaller sources of bacterial contamination to 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 may 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. e) **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 from occupants of neighboring apartment complexes who bring their dogs onto campus property to defecate. f) **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. g) **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, UNM's Safety & Risk Services (SRS) department conducts specialized stormwater pollution prevention training to FM employees. SRS'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, SRS has had booths with handouts on stormwater		

	pollution prevention including pet wastes and measures to minimize bacterial contamination. SRS'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 new E-Coli TMDL. UNM, as a Phase 1 MS4 participant in a cooperative monitoring program with the COA, AMAFCA and New Mexico Department of Transportation continues to pay a share of the monitoring costs for storm water 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.		

WET WEATHER MONITORING

Permit Activity	Proposed Plan	Measurable 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 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 entities' jurisdiction(s). Permittees may choose either Option A (individual monitoring) or Option B (cooprerative monitoring program). As described in Part III A.1.b: Cooprerative 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. 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 3 events wet season and 2 events in dry season.	All discharges during a storm event are collected at outfall locations. • UNM and its current MS4 partners have hired the USGS to perform sample collection at 5 representative outfall locations. If new wet weather monitoring sites are installed, 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 entered into a monitoring cooperative and signed an intergovernmental agreement with several agencies during the reporting cycle. It also provided the EPA a monitoring plan and certification to start monitoring stormwater. Monitoring results (DMRs) will be reported by one of the co-permittees (AMAFCA) on behalf of the cooperative.

DRY WEATHER DISCHARGE SCREENING OF MS4

Permit Activity	Proposed Plan	Measurable Goal	Status
As described in part III.A.2, 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 wet season (July 1 through October 31) and dry 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, any pollutant that has been identified as 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.	• There are no perennial streams in the Albuquerque Metropolitan area. As such, 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 and Grease, and nutrients. Any discharge collected will be a grab sample.	• Provide results of the assessment in each annual report.	UNM entered into a monitoring cooperative and signed an intergovernmental agreement with several agencies during the reporting cycle. It also provided the EPA a monitoring plan and certification to start monitoring stormwater. Monitoring results (DMRs) will be reported by one of the co-permittees (AMAFCA) on behalf of the cooperative. Dry weather screening at UNM is done as part of the IDDE.

Table 1

UNM Storm Drain Inlets for Quarterly Maintenance and Measurement Operations

Inlet #	LOCATION
1.	West of Centennial Engineering (Bldg.122) in roadway along West Curb line
2.	West of Hibben Center (Bldg. 15) in bump out on West side of road (2-inlets)
3.	North of Zimmerman (Bldg. 53) in 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 south end of parking lot
15.	NW of Ford Utilities (Bldg. 116) in parking lot
16.	SW corner of Novitski Hall (Bldg. 249) in SW corner of south parking lot
17.	South side Of HSSB (Bldg. 266) in walkway
18.	NW of HSSB (Bldg. 266) in lawn area
19.	NW of Novitski Hall (Bldg. 249) in SE corner of north parking lot (2-inlets)
20.	NW of Observatory (Bldg. 208) in NW corner of parking lot.

Created by FM

Version Date: Sept. 1, 2012