

Yates, Adam

From: Yates, Adam
Sent: Wednesday, January 06, 2016 9:59 AM
To: 'Vince Rodgers'
Subject: RE: Annual Report Deficiency Response

Vince,

Thank you for your submittal of the amended 2014 Annual Report for the subject MS4 permit, ARR040020. This additional information is sufficient in the effort to resolve the deficiency noted in the ADEQ letter dated December 28, 2015.

Thank you for your cooperation in this matter. If you have any questions concerning this matter or need additional information, please feel free to contact me.

Kindly,

Adam Yates
Engineer - NPDES Permits Section
Water Division

From: Vince Rodgers [<mailto:varodgers@ualr.edu>]
Sent: Monday, January 04, 2016 3:17 PM
To: Yates, Adam
Subject: Annual Report Deficiency Response

Adam,

Please see the attached amended 2014 annual report for UALR. I mistakenly left out current procedures for long-term O&M and post-construction management. Below is the section from the SWMP which details activities.

5. POST-CONSTRUCTION STORMWATER MANAGEMENT (3.2.5)

Rationale Statement and Decision Process

UALR has and updates the Campus Master Plan for campus and community long-range renewal and growth opportunities. The plan consists of two companion documents, the University's strategic plan, and a plan for the University District that focuses on revitalizing the immediately surrounding city areas. Both documents include strategies for stormwater management. Post-construction BMPs will ultimately conform to drainage and runoff strategies associated with the Master Plan.

Post-construction stormwater management is a key activity to ensure that when BMPs used during construction are removed, runoff is monitored and evaluated for possible pollutants. The requirements to correct any deficiencies with stormwater runoff will be the responsibility of the contractor under the direction of FM and EHS. Any corrections not addressed by contractors will be reported to ADEQ. EHS will inspect and evaluate runoff under the following conditions:

1. Dry-weather screening
2. Following rain events
3. Building systems drainage
4. Activity based pollution opportunities
5. Sampling, where applicable

These parameters will be assessed by a qualified staff member and any deficiencies and corrections will be forwarded to the contractor for immediate rectification. In addition, it is UALR's goal to assure post-construction TSS levels are within 20% of TSS pre-construction levels. Landscaping activities, which follow construction, will incorporate non-structural BMPs to mitigate runoff such as riparian buffer zones, natural abstractions, preserving undeveloped land areas (natural settings), continue to maximize development of green areas, and minimize impervious areas where possible.

BMPs – Measurable Goals – Responsible Person(s)

BMP	Measurable Goal	Responsible Person(s)
Develop BMPs that work in confluence with the Master Plan	Administrative approval of direction of SWMP	David Millay
Post-Construction inspection and evaluation	Number of violations/corrections	Vince Rodgers, Andrijana Vukovich, John McMains
Sample pre and post construction	Maintain acceptable TSS levels	Vince Rodgers
Utilize non-structural BMPs	Reduction in runoff pollution opportunities	Sandra Vail, Vince Rodgers

Performance Standards

Post-review of pre-construction runoff plans will be evaluated for consistency of the design of drainage strategies. Regular inspections and buildings and grounds maintenance will ensure maximum runoff mitigation effects. FM and EHS will oversee long-term management of BMPs.

Please let me know if this adequately addresses the deficiency.

Thanks,

Vince

Vince Rodgers, MBA, CCHO, COSS, CRSO
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