

ARR040000 Recertification Notice of Intent for Regulated Small Municipal Separate Storm Sewer Systems (MS4s) General Permit

version 1.16

(Submission #: HPZ-62EC-XM511, version 3)

Digitally signed by:
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Date: 2024.01.23 15:45:46 -0600
Reason: Copy Of Record
Location: North Little Rock, Arkansas



Details

AFIN 88-00850
Reference # ARR040020
Submission ID HPZ-62EC-XM511
Submission Reason Renewal

CORRECTION REQUEST (CORRECTED)

RO must submit application

If anyone other than the Responsible Official submits the application, you must choose Hard Copy Signature as the signing option, NOT eSignature.

Created on 1/16/2024 3:01 PM by **Will Broshears**

1 COMMENT

Shawn Bayouth (sbayouth@ualr.edu) (1/23/2024 1:34 PM)

I will send this to the RO for signature.

CORRECTION REQUEST (CORRECTED)


Pollution Prevention/Good Housekeeping

Please detail how/when inspections are conducted (PART III.2.F.c.3) and flood management procedures (also PART III.2.F.c.3)

Created on 1/16/2024 3:00 PM by **Will Broshears**

1 COMMENT

Shawn Bayouth (sbayouth@ualr.edu) (1/23/2024 1:28 PM)

Added the following language to section 3.2.6: "Inspections on all university facilities will be conducted once per quarter by either EHS personnel or the supervisor of each facility. Inspection reports will be filed in the Environmental Health & Safety Office, and may be included as appendices of the Stormwater Management Plan. Any time a corrective action is noted, a training review will be conducted and documented within seven calendar days. Training will also be conducted for each staff member that maintains any university facility, including those who inspect stormwater controls. Standard operating procedures will be developed and followed to ensure that no pollutants are exposed to the elements and are maintained in secondary containment, including, but not limited to salt piles, asphalt storage, pesticides, fertilizers, fueling stations, petroleum handling and storage for the small quantity generator and waste management. Urban development continues to generate additional sheet flow conditions and flooding, especially in low-lying areas. The University discharges to Coleman Creek, which is located in the AE flood zone. This zone stands for Area of Special Flood Hazard and is considered high risk for development. All development, in addition to the Board of Trustees requirements, will be studied and assessed by a Registered Professional Engineer to determine any flood risk to Coleman Creek, the University and any property owners along it. Flood management projects will be used when necessary to reduce the possibility of any flood risk from development to ensure the health and safety of our community."

CORRECTION REQUEST (CORRECTED)

Construction Runoff Control

Please detail what regulatory mechanism and sanctions will be followed (PART III.2.D.b.1), and how submissions from the public will be received (PART III.2.D.b.5).

1 COMMENT

Shawn Bayouth (sbayouth@ualr.edu) (1/23/2024 1:23 PM)

Added the following language under section 3.2.4: "Construction contracts with the University of Arkansas, Little Rock, have unique approval requirements promulgated by both the Board of Trustees and the State of Arkansas. A link relative to these requirements is as follows: https://www.ualr.edu/wp-content/uploads/sites/16/2017/09/Capital-Construction-Policies-and-Procedures_-8-31-17.pdf (see sections IX (c, d, e, j, k) and XI). Complaints received from the public will be addressed within 24 hours from the complainant and addressed via the above Board of Trustee requirements, which can include serious sanctions, up to and including the revocation of a contractor's license."

CORRECTION REQUEST (CORRECTED)

Illicit Discharge

Please include details pertaining to enforcement (PART III.2.C.h.3) and dry weather screenings. You included dry weather screenings under construction, but they can be moved or copied to the Illicit Discharge section.

Created on 1/16/2024 2:51 PM by **Will Broshears**

1 COMMENT

Shawn Bayouth (sbayouth@ualr.edu) (1/23/2024 1:22 PM)

Added new section entitled: Procedures for Dry-Weather Screening Inspections in 3.2. The language added is as follows: "Dry-weather screenings will be conducted every quarter, rotating different areas of the property. Areas will be prioritized where hazardous/biological wastes are stored, on-site restaurants with grease traps, vehicle storage and repair facilities and dormitories where students reside. If any sources of illicit discharges are identified, the source of such discharge will be traced to its origin and documented. Corrective actions, such as warnings or fines will be assessed depending on the significance of the discharge and previous warnings."

Form Input

Permit Information

Recertification Instruction

Please review all fields carefully for typos or inaccurate information. If the information in the corresponding field is incorrect, please update the corresponding field with the correct information by typing over the existing information.

If the Permittee (Legal Name) changes, you will need to also submit a permit transfer form.

The update SWMP must be submitted in accordance with the permit.

Permittee (Legal Name)

The permittee means any person (an individual, association, partnership, corporation, municipality, state, or federal agency) who has the primary management and ultimate decision-making responsibility over the operation of a facility or activity.

Permit No.

ARR040020

AFIN

88-00850

Permittee (Legal Name)

University of Arkansas at Little Rock

Site Contact Person**Contact Person Information****First Name** **Last Name**

Shawn Bayouth

Title*Director of Environmental Health & Safety***Phone Type** **Number** **Extension**

Business 5019166351

Email

sbayouth@ualr.edu

Urbanized/Core Areas

Little Rock Urbanized Area

Receiving Stream

Coleman Creek

Is this MS4 identified on the list of the EPA approved Total Maximum Daily Loads (TMDL)?

No. For UA Little Rock at this time, a Total Maximum Daily Load (TMDL) has not been established for the receiving waters.

From our database, the Responsible Official are listed in the following**Responsible Official First Name**

Leslie

Responsible Official Last Name

Hutchins

Responsible Official Title

A.V. Chancellor

Did the Responsible Official Change?

No

Please provide the Responsible Official Email Address

lkhutchins@ualr.edu

From our database, the Cognizant Official are listed in the following**Cognizant Official First Name**

Shawn

Cognizant Official Last Name

Bayouth

Cognizant Official Title

Director of EHS

Did the Cognizant Official Change?

No

Please provide the Cognizant Official Email Address

sbayouth@ualr.edu

Mailing Address

2801 South University Ave.

Little Rock, Arkansas 72204

Is the invoice address the same as the mailing address?

Yes

Attach Updated SWMP and Updated Storm Sewer System Map

Pages from UALR SWMP March 2022 WIP.pdf - 11/15/2023 01:52 PM
UPDATED UALR SWMP January 2024 WIP.docx - 01/23/2024 01:30 PM
Comment
NONE PROVIDED

Revisions

Revision	Revision Date	Revision By
Revision 1	11/15/2023 1:46 PM	Shawn Bayouth
Revision 2	11/15/2023 2:10 PM	Shawn Bayouth
Revision 3	1/23/2024 1:19 PM	Shawn Bayouth

Agreements and Signature(s)

SUBMISSION AGREEMENTS

- ☒ I am the owner of the account used to perform the electronic submission and signature.
- ☒ I have the authority to submit the data on behalf of the facility I am representing.
- ☒ I agree that providing the account credentials to sign the submission document constitutes an electronic signature equivalent to my written signature.
- ☒ I have reviewed the electronic form being submitted in its entirety, and agree to the validity and accuracy of the information contained within it to the best of my knowledge.

"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 gather and evaluate 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."

I certify that I have read and will comply with all the requirements of the Regulated Small Municipal Separate Storm Sewer Systems(MS4's) General Permit ARR040000.

**Signed
By**

Shawn Bayouth on 01/23/2024 at 1:35 PM

Leslie Hutchins on 01/23/2024 at 3:45 PM



UA LITTLE ROCK



UA LITTLE ROCK

Stormwater Management Program

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CONTACT INFORMATION

Information Desired	Contact	Department	Phone #	Email/Website
To report any suspected water pollution activity	Operations Center	Facilities Management	916-3390	http://ualr.edu/facilities/
For information or questions regarding UA Little Rock stormwater programs	Shawn Bayouth	Environmental Health and Safety	916-6351	sbayouth@ualr.edu
UA Little Rock Sustainability Website	---	UA Little Rock Campus	---	https://ualr.edu/sustainability
UA Little Rock Stormwater Website		Environmental Health and Safety		Stormwater Management Plan - Facilities Management (ualr.edu)
Program Events Participation	Shawn Bayouth	Environmental Health and Safety	916-6354	sbayouth@ualr.edu
Illegal Dumping Reporting	Dispatch	Dept. of Public Safety	916-3400	http://ualr.edu/safety/
State Requirements	ADEQ-Stormwater	Water Division-MS4 Permits	682-0744	http://www.adeg.state.ar.us/water/branch_permits/general_permits/stormwater/default.htm

INTRODUCTION

The purpose of this Stormwater Management Program (SWMP) is to comply with the Arkansas Department of Environmental Quality (ADEQ) General Permit ARR040000 pursuant to Environmental Protection Agency (EPA) code 40 CFR 122.32. In accordance with the Arkansas Water and Air Pollution Control Act (Act 472 of 1949, as amended, Ark. Code Ann. 8-4-101 et seq.), and the Clean Water Act (33 U.S.C. 1251 et seq.), the discharge of stormwater from the Municipal Separate Storm Sewer System (MS4) at the University of Arkansas at Little Rock is authorized. UA Little Rock holds MS4 Individual Permit ARR040020 where ADEQ grants UA Little Rock the authority to discharge stormwater runoff under the terms and conditions specified in ARR040000. UA Little Rock has completed a Notice of Intent (NOI) and this SWMP complies with Parts 2, 3, and 4 of the permit. The UA Little Rock Facilities Management (FM) department's Associate Vice Chancellor (AVC) is responsible for administering the SWMP. The UA Little Rock Environmental Health and Safety (EHS) Director in conjunction with the UA Little Rock Environmental Health and Safety Committee (EHSC) manage policy and program development.

STORMWATER MANAGEMENT PROGRAM

Purpose and Intent

UA Little Rock campus community consists of approximately 12,000 including students, staff, and faculty. Universities are, within their borders, essentially small communities where people live and work every day. Each community member is responsible to recognize why and how stormwater pollution is generated and transported to affected waterways. In addition, contractors who work on campus are under requirements to maintain practices that prevent runoff pollution from their activities. It is Facilities Management's goal to monitor, inform, and train those in the community as to the best methods to maintain the integrity of the waters on campus and downstream. UA Little Rock has evaluated the permit requirements for the six minimum control measures specified in Part 3.2 of the general permit. Based on that review, Best Management Practices (BMPs) are selected for each control measure that will best accomplish the overall goal of reducing pollution from stormwater runoff to the Maximum Extent Practicable (MEP). The Director of EHS is responsible for developing goals and identifying/implementing BMPs under ARR040020. The EHSC reviews and assists with program development.

Reviewing and Updating the SWMP

The EHS Office will review the SWMP annually and evaluate the implementation and effectiveness of the SWMP components. If the SWMP requires revision, updates are performed by EHS under advisement of the EHSC. Revisions are submitted to ADEQ along with an explanation and description of the changes.



Monitoring

UA Little Rock will evaluate program compliance, the appropriateness of identified BMP's, and progress towards achieving identified measurable goals. The UA Little Rock campus has no retention basins for stormwater that would eventually drain to the Coleman Creek, which in turn runs into the Fourche Creek Wetlands, the Arkansas River, the Mississippi River, and on to the Gulf of Mexico. For UA Little Rock at this time, a Total Maximum Daily Load (TMDL) has not been

established for the receiving waters. In addition, none of the streams on campus are 303(d) listed for impaired waters. Therefore, UA Little Rock will not sample and analyze the discharge from the small MS4 under an established program. If circumstances change and dictate the need for sampling and analysis, UA Little Rock will act appropriately. In addition, UA Little Rock may opt to sample according to construction site stormwater management protocol.

Performance Standards

BMPs and other mechanisms are routinely examined to validate effectiveness of current methods. Each method under the six minimum control measures has different and separate BMPs; each will be qualified on its own merit by EHS. Recommendations will be forwarded to EHSC and FM.

BMPs and Measurable Goals

BMPs and measurable goals are established by assessment of needs based on project parameters and specific conditions. EHS, the EHSC, and FM work together to establish the best methods and develop goals to mitigate runoff pollution and achieve a desired outcome. These three entities represent a cross section of expertise in environmental, chemical, biological, engineering, and construction ideologies. The AVC of FM will coordinate long-term goals in alignment with the master design plans.

Annual Reports

UA Little Rock will submit an annual report to ADEQ by March 31st for the previous year. UA Little Rock will report information required in Parts 3.2 and 4.3 of the general permit.

CONTROL MEASURES (Permit Section 3.2)

1. PUBLIC EDUCATION AND OUTREACH ON STORMWATER IMPACTS (3.2.1)

Rationale Statement and Decision Process

UA Little Rock campus community consists of approximately 12,000 including students, staff, and faculty. UA Little Rock has multiple channels through which to communicate information to the campus community on both large and small scales. The EHS office will consult with the EHSC in an effort to develop the best methods of communicating stormwater management policies to and receiving feedback from the campus population. The operation of chemical and biological labs creates the opportunity to release hazardous material that may enter Coleman Creek, if not properly controlled. In addition, the operation of a motor pool, grounds maintenance, and building maintenance activities also create similar opportunities. Contractor activities also provide disruptions to the landmass that could cause stormwater pollution. Proper control of materials that could represent a danger to surface waters are discussed during training sessions. Specifically, the following six modules address the proper handling of hazardous materials and waste generated and/or consumed on campus:

- ✓ Disposing of Biohazardous Waste
- ✓ Hazard Communication – Safety Data Sheets
- ✓ UALR Chemical Hygiene Plan
- ✓ Bloodborne Pathogens
- ✓ Shipping of Hazardous Materials
- ✓ Spill Prevention, Control, and Countermeasures

Topics include biohazards and waste disposal methods, chemical safety and handling, containerization and disposal methods, hazardous waste collection, vehicle washing and fueling, fuel and chemical storage, cleanup methods, AST-UST, BMPs, and secondary containment.

UALR has a Committee on Sustainability and a supporting Sustainability website. The site is located at <https://ualr.edu/sustainability>. In addition, BMPs utilized to facilitate communication between EHS and the campus community are listed below:

BMPs – Measurable Goals – Responsible Person(s)

BMP	Measurable Goal	Responsible Person(s)
Website Creation/Maintenance	Provide information to public with comment section and quantify responses	EHS Director
Policy Development	Policies in place that address possible forms of stormwater pollution	Environmental Health and Safety Committee
Contractor Management- Meet with and inform contractors of UA Little Rock policies	Participation and Compliance	Director of Planning, Design and Capital Construction
Training	Attendees and recipients of HazMat/Chemical Hygiene/Biosafety/SDS/HazCom/SPCC Training	Chemical Hygiene Officer

Performance Standards

The mechanisms to reach the campus community are predominantly electronic. For sustainability reasons, EHS and FM opt to utilize paperless communication whenever possible. Campus email, website postings, and the UA Little Rock “E-News” are alternative methods of written communication. The entire campus community is targeted in this effort and it is expected that 100% of the recipients receive messages. It cannot be determined how many recipients actually read the messages and understand the content. Training modules that address pollutants, such as chemical hygiene and spill prevention are developed. In addition, there are ongoing training activities in labs and on job sites that address the proper handling of hazardous materials. Documentation of recipients of training is maintained by EHS. Staff are instructed on accidental releases mitigation. Contractors, being the primary source of potential runoff pollution, are informed and required by FM and EHS to comply with ADEQ regulations and University policies pertaining to stormwater pollution prevention.

2. PUBLIC INVOLVEMENT/PARTICIPATION (3.2.2)

Rationale Statement and Decision Process

UA Little Rock encourages input and comment from the campus community regarding all facets of stormwater management. The EHS Stormwater Management website is the predominant manner in which community members can access information and provide comment on stormwater related topics. EHS, in conjunction with the EHSC and FM, makes recommendations as to how, when and why to solicit public involvement. BMPs for facilitating public involvement are listed below:

BMPs – Measurable Goals – Responsible Person(s)

BMP	Measurable Goal	Responsible Person(s)
Website Access – links to ADEQ, EPA, and UA Little Rock policy regarding stormwater. Comments can be made on the website	Number of comments; quality of involvement	EHS Director

BMP	Measurable Goal	Responsible Person(s)
Coleman Creek Annual Cleanup Activity	Number of Participants	Sustainability Committee
Earth Day Celebration	Volume of traffic to stations; pounds of recyclables collected; number of computer components/batteries collected	Sustainability Committee Director of Custodial and Grounds Services
Recycling – bins are located throughout the campus to collect paper, plastic, and aluminum	Annual pounds collected	Director of Custodial and Grounds Services
UA Little Rock Sustainability Committee – encourages participation through seminars/webinars to increase awareness	Number of participants	Sustainability Committee Chair

Performance Standards

The above listed BMPs will be evaluated for effectiveness as needed. Data is stored for reference.

3. ILLICIT DISCHARGE AND ELIMINATION (3.2.3)

Rationale Statement and Decision Process

Illicit discharges have not been problematic on campus in recent years; however, programs are in place to address the possibility. Illicit discharges on campus are strictly prohibited to include illegal dumping in accordance with 40 CFR 122.26 (b)(2). The UA Little Rock Department of Public Safety (DPS) enforces pollution laws and responds to any incidences. FM and EHS work closely with DPS to ensure that any detected incidence of illicit discharge is thoroughly investigated and mitigated. All student chemical activity is monitored by faculty and staff at the class/lab level. Any waste generated by chemical, biological, or physical means is collected and disposed of according to federal and state regulations and according to the UA Little Rock Chemical Hygiene Plan, Biosafety Manual, Radiation Safety Policy, Recycling Program, and general waste management practices. The EHS office and/or the Chemical Hygiene Officer (CHO) manage the day-to-day operations for chemical safety and hygiene by routine inspections, training, and lab design.

UA Little Rock prohibits improper waste disposal per the Chemical Hygiene Plan and Biosafety Manual. In addition, UA Little Rock's designation as a Small Quantity Generator (SQG) by ADEQ requires that we follow waste management protocols and procedures as required by Regulation 23. Plans and programs are available to the community through the EHS website that outline in detail chemical and biological hazardous material handling procedures. The Director of Facility Services coordinates operations that may result in pollutant runoff. Oil from auto-maintenance operations is collected and stored in two 250-gallon above ground storage tanks until the oil is picked up for recycling. UA Little Rock uses green cleaning products wherever practical. Fertilizers and herbicides are used at a minimum and lawn irrigation performed only as necessary to maintain the grounds. FM maintains a map of all systems including storm sewers and outfalls. This map is updated as needed by the FM Engineer. Architects are consulted when new structures are erected and are charged with developing adequate drainage plans for stormwater.

Identified Sources of Illicit Discharge

No identifiable sources of runoff significantly affect water quality at UA Little Rock; however, there are potential sources. Lawn irrigation, HVAC condensate, roof/building drainage to grade, and accidental releases of chemical and biological agents are monitored and controlled to mitigate release. It is the responsibility of EHS, FM Mechanical Engineers, and FM Capital Planning and Construction to formulate mapping of all stormwater flows and outfalls. In addition, UA Little Rock FM staff should be cognizant of developments that could influence stormwater control. UA Little Rock considers the discharges listed in Part I.C.2 of the permit to be allowable non-stormwater discharges. These discharges will be unregulated unless UA Little Rock identifies them as a significant contributor of pollutants to the MS4. DPS patrols the campus 24 hours per day; any activity that may be construed as “illegal” is addressed immediately. In addition, UA Little Rock installs and monitors video surveillance cameras at construction sites and other sites on campus. If inspection violations are not corrected, UA Little Rock will refer non-compliance activities to ADEQ. Likewise, any illicit discharges discovered from non-construction activities will be remanded to the proper authorities.

Procedures for dry-weather screening inspections

Dry-weather screenings will be conducted every quarter, rotating different areas of the property. Areas will be prioritized where hazardous/biological wastes are stored, on-site restaurants with grease traps, vehicle storage and repair facilities and dormitories’ where students reside.

If any sources of illicit discharges are identified, the source of such discharge will be traced to its origin and documented. Corrective actions, such as warnings or fines will be assessed depending on the significance of the discharge and previous warnings.

BMPs – Measurable Goals – Responsible Person(s)

BMP	Measurable Goal	Responsible Person(s)
DPS – Enforces pollution laws	Number of violations	Chief of Police
Lab inspections	Number of inspections	Chemical Hygiene Officer
Chemical waste collection, storage, and disposal	Amount of material	Chemical Hygiene Officer
Policy development and review	Affective and effective to specific areas	EHSC
Street sweeping (collection of debris), green chemical use, lawn irrigation, fertilizer use	Active monitoring by FM and EHS	Director of Custodial and Grounds Services
Update maps as needed	Identify collection areas and outfalls	Energy Management Services, Assistant Director
Collect sample data	Maintain reasonable parameter levels	Chemical Hygiene Officer
Perform dry weather field screening by qualified	Number of Violations	Chemical Hygiene Officer

personnel		
Construction site SWPPP management and inspection.	Number of Violations	Director of Planning, Design, and Capital Construction
Maintain and update topographical maps	Efficiency of and ability to identify outfalls and predict flow patterns.	Energy Management Services, Assistant Director
Police patrols, surveillance cameras, discharge monitoring	Number of violations or pollution instances	UALR Chief of Police

Performance Standards

All data regarding performance will be assessed at least annually and actions will be taken according to effectiveness.

4. CONSTRUCTION SITE STORMWATER RUNOFF CONTROL (3.2.4)

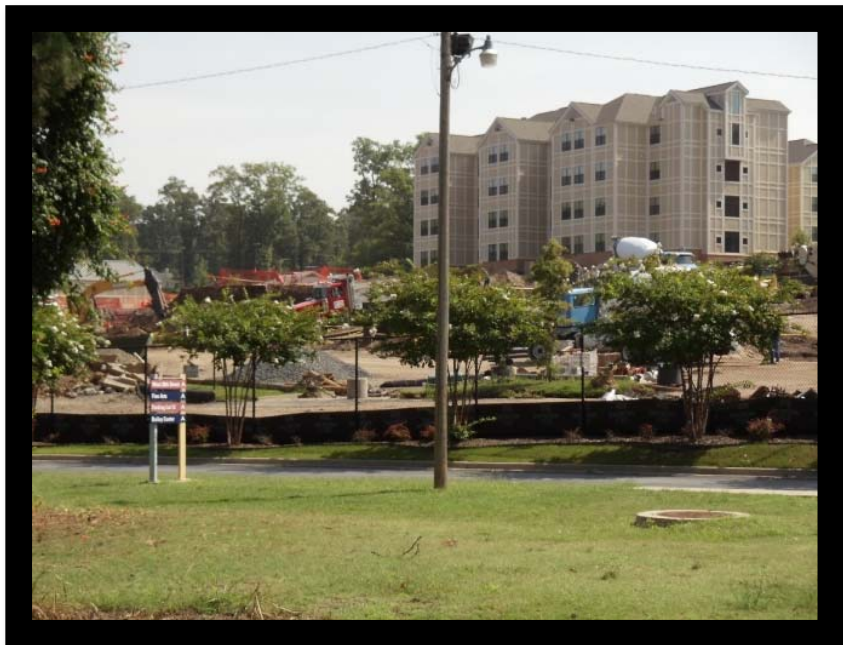
Rationale Statement and Decision Process

Construction activities are perhaps the most obvious source of stormwater pollution. In order to ensure that BMPs are observed, UA Little Rock established requirements for community members and contractors. FM and EHS will oversee all construction sites and SWPPPs for control of sediments, erosion, and waste (particularly concrete wastes)

by pre-construction review of plans and monthly inspection throughout the course of construction. If inspection violations are not corrected, UA Little Rock will refer non-compliance activities to ADEQ. Likewise, any illicit discharges discovered from non-construction activities will be remanded to the proper authorities.

Construction contracts with the University of Arkansas, Little Rock, have unique approval requirements promulgated by both the Board of Trustees and the State of Arkansas. A link relative to these requirements is as follows: https://www.uasys.edu/wp-content/uploads/sites/16/2017/09/Capital-Construction-Policies-and-Procedures_-8-31-17.pdf (see sections IX (c, d, e, j, k) and XI).

Complaints received from the public will be addressed within 24 hours from the complainant and addressed via the above Board of Trustee requirements, which can include serious sanctions, up to and including the revocation of a contractor's license.



Procedures for construction-site inspection

Inspections begin with a review of maps and familiarization with area roads, land uses, and natural features. Inspectors will review any documents pertaining to the construction of the area such as SWPPPs, site plan maps, other permits granted to the contractor, records of previous compliance, and NOIs. Inspections will be conducted according to the contract documents and as deemed necessary by UA Little Rock Environmental Health and Safety. The inspection will be conducted as described below.

The inspector will:

1. *Introduce self as the UA Little Rock SWPPP inspector and communicate to the contractor's representative that an inspection is occurring.*
2. *Request or locate the on-site copy of the SWPPP and become familiar with any changes that have been made to the SWPPP.*
3. *Walk (or slowly drive) the perimeter of the site and note outfalls to water and/or drainage channels.*
4. *Inspect outfalls for signs of wastes and sediment. Document any waste or sediment.*
5. *Inspect active and inactive portions of the construction areas for properly installed BMP's and material storage.*
6. *Communicate with the contractor the status of compliance and make recommendations for any corrections.*
7. *Follow up on corrections and communicate to the contractor if the violations should be referred to ADEQ for further investigation.*

BMPs – Measurable Goals – Responsible Person(s)

BMP	Measurable Goal	Responsible Person(s)
Perform dry weather field screening by qualified personnel	Number of Violations	Chemical Hygiene Officer
Construction site SWPPP management and inspection.	Number of Violations	Director of Planning, Design, and Capital Construction
Maintain and update topographical maps	Efficiency of and ability to identify outfalls and predict flow patterns.	Energy Management Services, Assistant Director
Police patrols, surveillance cameras, discharge monitoring	Number of violations or pollution instances	UALR Chief of Police

Performance Standards

As the campus grows and evolves, UA Little Rock will enhance programs as deemed appropriate and implement changes to mitigate pollution. As the topography changes, UA Little Rock will adapt existing systems and develop new ones. Construction activities will continue to be monitored and pre-construction conferences held to identify and communicate expectations for stormwater pollution prevention to contractors for all applicable projects.

5. POST-CONSTRUCTION STORMWATER MANAGEMENT (3.2.5)

Rationale Statement and Decision Process

UA Little Rock maintains and modifies 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 areas. Both documents include strategies for stormwater management and pollution prevention. 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 violations 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; and
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. 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	Facilities Management Associate Vice Chancellor
Post-Construction Inspection and Evaluation	Number of Inspections/Corrections	Director of Planning, Design, and Capital Construction
Sample pre and post construction	Maintain acceptable TSS levels	EHS
Utilize non-structural BMPs	Reduction in runoff pollution opportunities	Director of Custodial and Grounds Service

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.

6. POLLUTION PREVENTION AND GOOD HOUSEKEEPING (3.2.6)

Rationale Statement and Decision Process

It is important to maintain the campus in a manner that reduces the opportunity for stormwater pollution. Many campus activities could affect water quality if left unmonitored and controlled. UA Little Rock has in place buildings and grounds maintenance operations that are designed to enhance the beauty of the campus and prevent pollutants from entering Coleman Creek and subsequent water bodies.

Streets and grounds are kept clean of trash and debris by FM. All materials collected are either recycled or disposed as waste. Building systems are maintained to prevent fluid leakage and any byproducts of processes or spills are collected and disposed of in accordance with ADEQ regulation 23. Automobiles are regularly maintained and waste petroleum products are collected in above ground storage tanks. A professional waste management company collects the tank contents. Daily cleanup activities ensure that debris is disposed before it can get into Coleman Creek. Grounds are landscaped to enhance the natural beauty of the campus, which in turn provides natural abstractions that mitigate runoff. Employees are trained on how to recognize hazards to protect themselves and the campus grounds. Parking lots are maintained routinely and any leaks/spills are absorbed and collected whenever possible. UA Little Rock has an aggressive recycling program that includes paper, plastic, aluminum, batteries, computer components, fluorescent lamps and HID/MV bulbs, and other miscellaneous recyclables.

Each FM employee has a basic understanding of safety data sheets (SDS) and biological hazards so they can report possible hazards to their supervisor. EHS oversees the HazMat Response. EHS maintains certification under OSHA HAZWOPER 24 and 40-hour criteria.

BMPs – Measurable Goals – Responsible Person(s)

BMP	Measurable Goal	Responsible Person(s)
Custodial Operations & Grounds Maintenance – Landscaping	Number of community complaints, overall cleanliness maintained	Director of Custodial and Grounds Maintenance
Building Systems & Automobile Maintenance	Tracking of systems for malfunction/leaks, etc	Operations, Assistant Director and the Operations and Services Director
Employee Training	Overall awareness	Director of EHS
Recycling	Amounts collected	Director of Custodial and Grounds Maintenance

Performance Standards

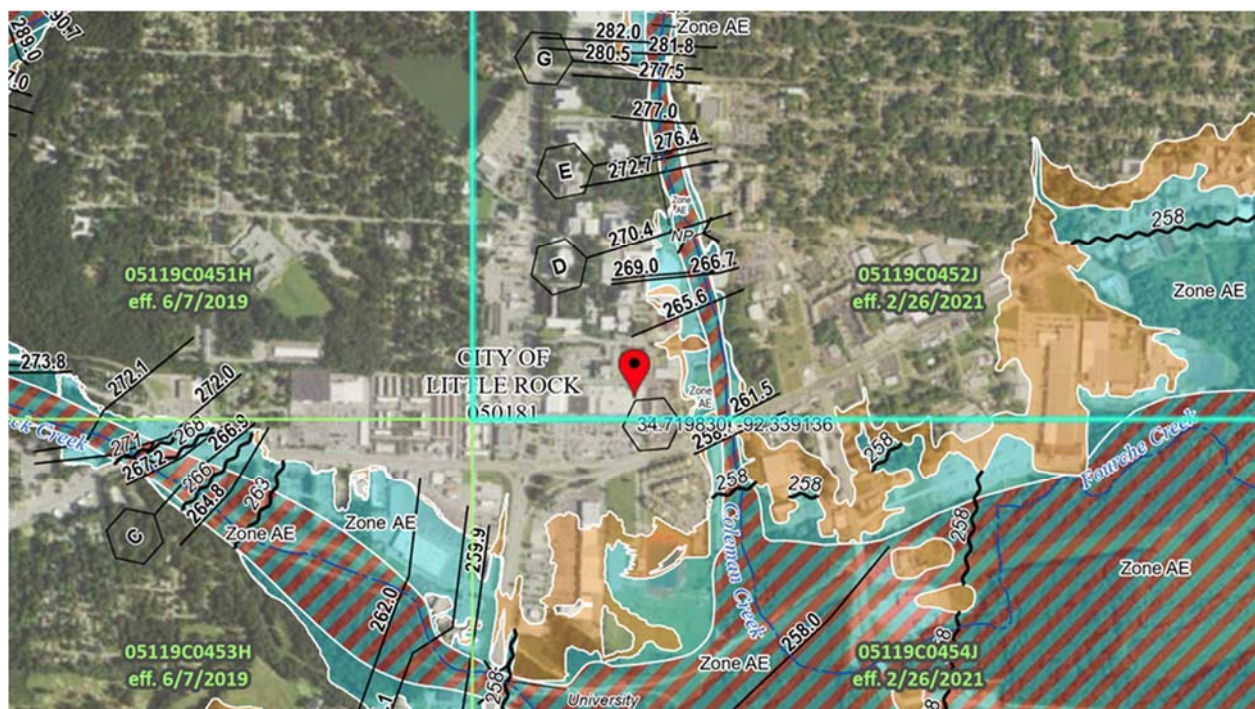
General housekeeping standards are maintained by the FM Director of Facility Services. Each employee receives annual, or as needed, training relevant to maintaining a clean work

environment, which influences good stormwater management. The SWMP is reviewed by EHS at least annually for appropriateness and effectiveness.

Inspections on all university facilities will be conducted once per quarter by either EHS personnel or the supervisor of each facility. Inspection reports will be filed in the Environmental Health & Safety Office, and may be included as appendices of the Stormwater Management Plan. Any time a corrective action is noted, a training review will be conducted and documented within seven calendar days.

Training will also be conducted for each staff member that maintains any university facility, including those who inspect stormwater controls. Standard operating procedures will be developed and followed to ensure that no pollutants are exposed to the elements and are maintained in secondary containment, including, but not limited to salt piles, asphalt storage, pesticides, fertilizers, fueling stations, petroleum handling and storage for the small quantity generator and waste management.

Urban development continues to generate additional sheet flow conditions and flooding, especially in low-lying areas. The University discharges to Coleman Creek, which is located in the AE flood zone. This zone stands for "Area of Special Flood Hazard" and is considered high risk for development.



All development, in addition to the Board of Trustees requirements, will be studied and assessed by a Registered Professional Engineer to determine any flood risk to Coleman Creek, the University and any property owners along it. Flood management projects will be used when necessary to reduce the possibility of any flood risk from development to ensure the health and safety of our community.

SHARING RESPONSIBILITIES

UA Little Rock has the sole responsibility to implement all measures described in this program.

SWMP REVIEW AND UPDATE

Annual evaluations, reviews, and updates are managed by EHS with input from the EHSC. ADEQ will be notified in writing before any additions to goals, BMPs, authority or other pertinent processes occur and in accordance with section 3.4 of the general permit.

MONITORING

UA Little Rock is not under any TMDL requirement per the individual permit. In addition, no discharges into 303(d) listed waters are applicable.

RECORDKEEPING AND REPORTING

All plans, inspections, SWPPPs, NOIs, NOTs, NOCs, and any other relevant documentation regarding stormwater management will be kept on file at FM for a period of not less than 3 years. Annual reports will be submitted by EHS to ADEQ in accordance with section 4.3 of the general permit.

Appendix A (Campus Map – Storm Sewer/Sanitary Sewer)



Appendix B (SWPPP Inspection Form)

UA Little Rock STORM WATER CONSTRUCTION COMPLIANCE INSPECTION REPORT

PERMIT NO.: _____ DATE OF INSPECTION: _____
PROJECT NAME: _____ COUNTY: _____
PROJECT DESCRIPTION (check one): ___ Residential ___ Commercial ___ Other: ___

I. TYPE OF INSPECTION:

- ___ 1) At least once every 7 calendar days, or
___ 2) At least once every 14 calendar days and within 24 hours of the end of a storm event of 0.5 inches or greater.

WEATHER CONDITIONS

- 1) Weather conditions during inspection: _____
2) Weather conditions since last inspection, including rainfall information: _____

SITE AND PLAN REVIEW

Are the following required items available for regulatory review:

- Y N 1) SWPPP
Y N 2) Copy of the General Permit
Y N 3) NOI
Y N 4) DHEC Coverage Letter
Y N 5) Co-permittee agreements or contractor certification statements
Y N 6) Weekly inspection forms

BEST MANAGEMENT PRACTICES

- Y N 1) Is the Construction entrance/exit properly installed according to plans
Y N 2) Is the perimeter silt fence and/or other controls properly installed
Y N 3) Did any BMPs fail to operate as designed or prove inadequate? *If Yes, Identify BMPs and location(s):

- Y N 4) Are additional BMPs needed? *If Yes, identify BMPs needed and which location(s):

Y N 5) Do any BMPs require maintenance? * If **Yes**, provide location(s) and description(s):

Y N 6) Is construction activity following the phasing and Sequencing plan?

Y N 7) Has construction activity on the site ceased for 14 days or more?

Y N 8) If activity has ceased, have temporary stabilization measures been installed within 14 days? *If **No**, identify location(s) needing stabilization:

Y N 9) Are litter, construction debris, oils, fuels, building products & construction chemicals being properly addressed and/ or removed? *If **No**, identify location(s):

FINAL STABILIZATION

Y N Have all land disturbing activities at the site permanently ceased? *If **Yes**, complete the following questions:

Y N 1) Are there any areas of active erosion evident? If **Yes**, location(s):

Y N 2) Does the permitted area have 70% permanent vegetative cover (i.e. grass or other cover) **OR** have equivalent measures such as riprap, or geotextiles been installed?

OFFSITE IMPACTS FROM PROJECT

Are there any offsite impacts? ___ **No** ___ **Yes**, where? ___ Public Right of Way ___ Adjoining
Property Owner ___ Wetlands ___ Creek/River ___ Lake/Pond ___ Other (please specify):

If answering “**Yes**” to the previous question, indicate the location and describe the impact:

DEFICIENCIES/ CORRECTIVE ACTIONS

Were deficiencies noted in this inspection previously listed in a monthly report? ___ Yes ___ No
Corrective Action needed as a result of this inspection, including date to be completed:

STORM WATER POLLUTION PREVENTION PLAN UPDATES

Y N 1) Does the SWPPP need to be modified as a result of the inspection?
Y N 2) Has the SWPPP been modified since the last inspection? If so, note the date(s):

COMMENTS

Inspector: _____ **Title/Qualifications:** _____