Storm Water Management Plan Outline

Introduction

- Regulatory Background
 - o Purpose of the Storm Water Management Plan
 - o Stormwater Management Committee

Site Information

- Facility Description
 - o Reference to the City of Conway
 - o Present Campus Boundaries
- Facility Operation
 - UCA Organizational Structure

Potential Sources of Wastewater Contamination

List of potential pollutants

Minimum Control Measures and Best Management Practices (BMPs)

Describe each control measure and permit requirements followed by a table for each measure with departments assigned to each measure as needed.

Measures

- Public Education and Outreach
- Public Participation and Involvement
- Illicit Discharge Detection and Elimination
- Construction Site Stormwater Management
- Post-Construction Site Runoff Control
- Pollution Prevention and Good Housekeeping for Facilities Operations and Maintenance

Example, there will be a table for each measure.

Year	вмР	Current Status	Implementation Details	Measurable Goal	UCA Depts.

Record Keeping

- Updating the Stormwater Management Plan
- Monitoring
- Record Keeping
- Annual Reports for the Storm Water Management Plan

NOTICE OF INTENT

FOR DISCHARGERS OF STORMWATER RUNOFF

ASSOCIATED WITH REGULATED SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS AUTHORIZED UNDER NPDES GENERAL PERMIT ARRO40000

I.	PERMITTEE INFORMATION New X [(Pe	rmit Tracki	ng Number ARR04	
	Regulated Small MS4 Name: University of Central Arkansas	<u></u>	Own	er Type:
	Mailing Address: 201Donaghey Ave		FEDERAL	X STATE
	Actual Street Address: 201Donaghey Ave		_ DUBLIC	OTHER
	City: Conway		Urbanized Area	City of Conway
	State: <u>AR</u> Zip: <u>72035</u>		County(ies):	Faulkner
	Enter the Latitude and Longitude of the approximate center of the Sma	ıll MS4 (A m	ap must be included.):	
N. Section	Small MS4 Latitude:35.0809 degrees min	utes	seconds	
	Small MS4 Longitude: 92.4549 degrees min	utes	seconds	
II.	PERMITTEE CONTACT INFORMATION			
	Name: _Michelle Ellington	Telephone:	501-450-3610	
	Title: Director of Energy and Sustainability Ema	il Address:	mellington@uca.edu	
III.	INVOICE MAILING INFORMATION			
	Invoice Contact Person: Michelle Ellington		City: Conway	
	Invoice Mailing Company: University of Central Arkansas	s	tate: AR	Zip: _72035
	Invoice Mailing Address: 201 Donaghey Ave	Teleph	one: 501-450-3610	
	For a municipality, State, Federal, or other public agency: By either a prepurposes of Part VI.H of the general permit, a principal executive officer of the agency, or (ii) a senior executive officer having responsibility for the agency (e.g., Regional Administrator of EPA). "I certify that the cognizant official designated in this Notice of Intent is of the provisions of 40 CFR 122.22(b). If no cognizant official has been of reports signed by the applicant. I certify under penalty of law that this direction or supervision in accordance with a system designed to assure information submitted. Based on my inquiry of the person or persons who for gathering the information submitted is, to the best of my knowledge at there are significant penalties for submitting false information, including violations." Responsible Official Printed Name: Tom Courtway	of a Federal age overall open qualified to a designated, I document at that qualified o manage the sand belief, trug the possibi	gency includes (i) the cerations of a principal gence as a dully authorized understand that the Dend all attachments were personnel properly gasystem, or those personne, accurate, and compility of fine and impris	hief executive officer geographic unit of the department will accept the prepared under my officer and evaluate the soldirectly responsible lete. I am aware that
	Responsible Official Signature: / lu Cour Twee	Date:	5/20/2016	
V.	COGNIZANT OFFICIAL DESIGNATION (Optional)	ental est		
	Cognizant Official Printed Name: Larry Lawrence		ysical Plant Director	
	Cognizant Official Signature: Jarry Jawsence		22.16	,
	Telephone501-450-5382	Email lar	ryl@uca.edu	
VI.	PERMIT REQUIREMENT VERIFICATION Submittal of Complete NOI? X Yes No Submittal of Complete Stormwater Management Program Outline? X Yes No	St	ubmittal of MS4 map?	X Yes \[\sum No



NOTICE OF INTENT FOR DISCHARGES OF STORMWATER ASSOCIATED WITH REGULATED SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS AUTHORIZED UNDER NPDES GENERAL PERMIT ARR040000

The enclosed form may be used to obtain coverage under NPDES general permit ARR040000 for discharges of stormwater associated with Regulated Small Municipal Separate Storm Sewer Systems (MS4). Only a copy of the attached authorized Notice of Intent form will be accepted by this Department.

Return the completed form to:

Arkansas Department of Environmental Quality Permits Branch, Water Division 5301 Northshore Drive North Little Rock, AR 72118

NOTE: DO NOT LEAVE BLANK SPACES IN THE NOTICE OF INTENT. IF ANY QUESTION DOES NOT APPLY, MARK "N/A" IN THE SPACE PROVIDED.

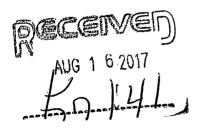
For additional information please contact:

General Permit Section, Water Division

Ph.: (501) 682-0623 Fax: (501) 682-0880 Web: www.adeq.state.ar.us

35.0809° N, 92.4549° W





UNIVERSITY OF CENTRAL ARKANSAS
201 Donaghey Avenue
CONWAY, ARKANSAS
72035

STORMWATER MANAGEMENT PLAN June 23, 2017

Primary Point of Contact:

Michelle Ellington

Director of Energy and Sustainability

501-450-3610

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UNIVERSITY OF CENTRAL ARKANSAS CONWAY, ARKANSAS STORMWATER MANAGEMENT PLAN

1.0 INTRODUCTION

1.1 Regulatory Background

In March 2003, U.S. EPA promulgated rules establishing Phase II of the NPDES stormwater program. The Stormwater Phase II Rule extends coverage of the NPDES stormwater program to "small" MS4s including nontraditional MS4s such as public universities, but takes a slightly different approach to developing and implementing the stormwater management program.

These regulations require the University of Central Arkansas, Conway, Arkansas (**UCA**) to obtain coverage under a National Pollutant Discharge Elimination System (**NPDES**) permit. These regulations also require a Stormwater Management Plan (**SWMP**) for UCA. UCA submitted a Notice of Intent (**NOI**), Appendix A, to be covered under the Regulated Small Municipal Separate Storm Sewer System (**MS4**) Stormwater Runoff General Permit (ARR040000) general permit on October 19, 2016. On March 20, 2017, UCA was advised that an outline of the SWMP originally submitted would not be sufficient to gain coverage under the NPDES permit under the revised rules. A checklist was developed by ADEQ and sent to UCA on March 27, 2017 to use in submission of a SWMP.

Once the draft of the SWMP is accepted by ADEQ, there will be a 30-day comment period on the SWMP. Based on the response to the public comment period, UCA may need to draft a revised SWMP before ADEQ staff drafts a final permit to cover stormwater discharges associated with the UCA (MS4). UCA will continue to develop the SWMP and report annually on progress.

1.2 Purpose of the Stormwater Management Plan

Polluted stormwater runoff is often transported to MS4s and ultimately discharged into local waterways (rivers, streams, lakes, and bays) without treatment. U.S. EPA's Stormwater Phase II Final Rule establishes an MS4 stormwater management program intended to improve the nation's waterways. Common stormwater pollutants include: oil and grease from roadways and parking lots, pesticides from lawns, sediment from construction sites, and trash. These pollutants are deposited into nearby waterways, impacting beneficial uses of the resource and interfering with the habitat for fish, other aquatic organisms, and wildlife.

This document has been developed to comply with the general permit performance standards for the ADEQ NPDES Regulated Small MS4 Stormwater Permit. This SWMP covers the UCA campus in Conway, Arkansas. UCA will use local codes, State Laws, and ADEQ regulations in addressing stormwater issues as the legal authority for enforcing stormwater regulations on campus.

The purpose of the SWMP is to (1) identify and reduce pollutant sources potentially affecting the quality and quantity of stormwater discharges, (2) provide Best Management Practices (**BMPs**) for municipal and construction activities to reduce contamination in stormwater to the Maximum Extent Possible (**MEP**), and (3) provide measurable goals to assess the effectiveness of BMPs that are designed to reduce the discharge of the pollutants into the storm drain system and associated waterways.

1.3 Stormwater Management Committee

A Stormwater Management Committee (**SWMC**) will be created at UCA that represents various campus departments and student groups to provide input into the development and implementation of the SWMP. The SWMC members represent the following departments and groups:

- Environmental, Health and Safety;
- Facilities Management Construction;
- Environmental Sciences/Biology;
- Housing;
- Facilities Management (Grounds Services, Maintenance);
- Student Government Association;
- Sustainable Environment and Ecological Design Committee; and
- Legal Counsel

1.4 Organizational Chart

UCA's organizational chart in Figure 1 shows the relationship of the Director of Energy and Sustainability and the rest of the SWMC members to the overall organizational. The Director of Energy and Sustainability, Michelle Ellington, will coordinate the implementation of the Stormwater Management Plan and each BMP.

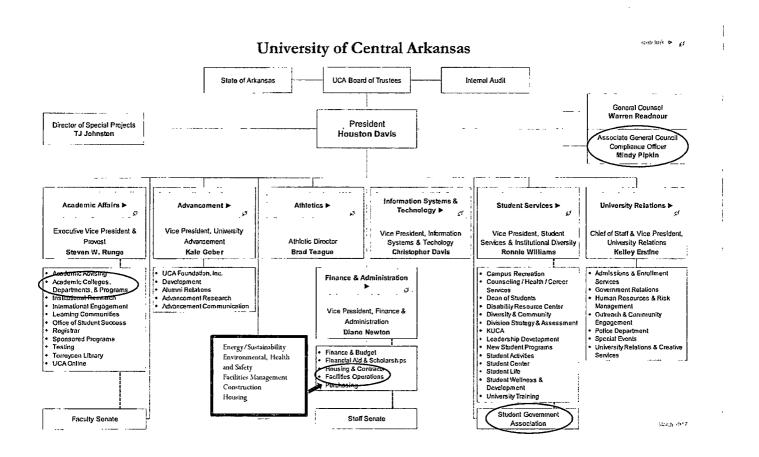


Figure 1. University of Central Arkansas Organizational Chart

UCA employs maintenance, custodial, and grounds staff for day-to-day university operations. There work includes building maintenance (cleaning, painting, repairs), completion of department work requests, cleaning of common buildings, grounds maintenance, small construction jobs, and various repair and maintenance activities. University staff and outside contractors perform electrical, plumbing, utility, roofing, asphalt repairs, exterior building painting, sewer line cleaning, janitorial duties, and other duties as assigned. The responsibilities are shared between the Physical Plant and Housing.

2.0 SITE INFORMATION

2.1 Facility Description

The UCA campus is centrally located within the boundaries of the City of Conway, see Figure 2.



Figure 2. City of Conway Boundaries

The UCA campus is shown in Figures 3 & 4. The properties included within the purple broken lines are the boundaries of the UCA campus. This includes: the main campus (academic, administrative and facilities departments; student housing; and parking lots), the athletic fields, as well as, Farris Center, Bear Stadium and Estes Stadium. Not all areas are contiguous to the main campus. An off campus facility, ADEM, is excluded from the scope of this permit and will remain in the City of Conway MS4 Stormwater Permit.

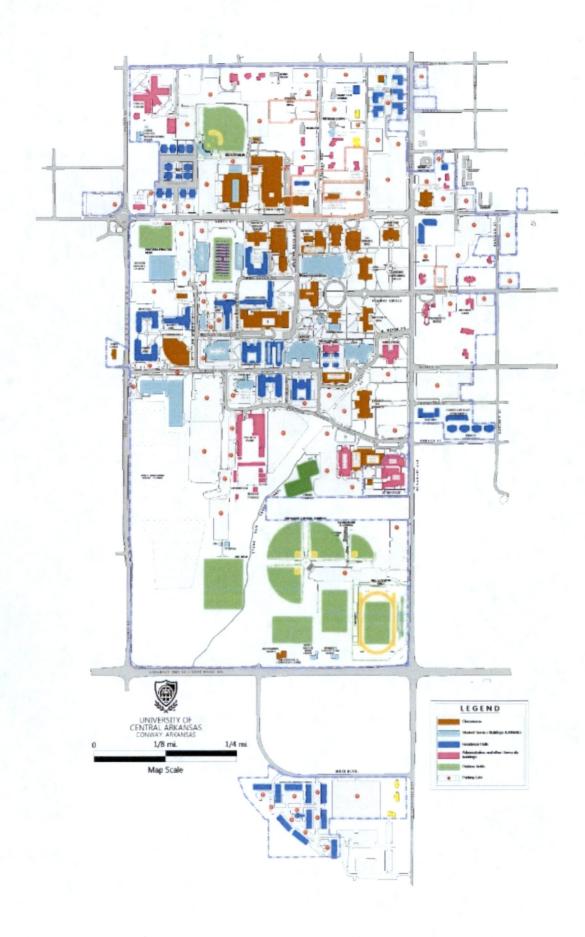


Figure 3. UCA Campus Boundaries

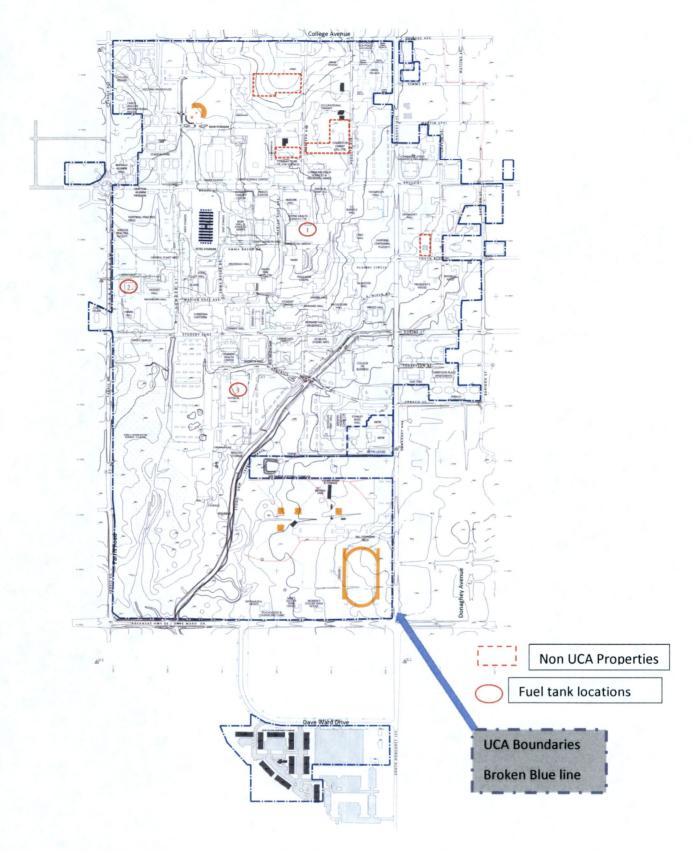


Figure 4. UCA Campus Boundaries and Fuel Storage Areas. Number 1 is the generator fuel storage at Torreyson Library, Number 2 is the generator fuel storage at New Hall Dormitory, Number 3 are the automotive gasoline and diesel fuel storage tanks at the Physical Plant.

Fuel Storage: Two underground bulk storage tanks containing diesel and unleaded gasoline are located at the Physical Plant on the UCA campus. Two diesel powered generators have 150-gallon diesel storage tanks attached to the skid and are positioned at New Hall Dormitory and Torreyson Library. A Spill prevention containment and countermeasures plan (**SPCCP**) will be developed during the term of this permit to address fuel and other chemical handling.

Miscellaneous Facts: Stormwater from the campus collects and discharges into Stone Dam Creek. The campus is bounded by a Hartshorne sandstone ridge to the south and a metamorphic rock ridge north of campus. The valley formed in between is predominantly heavy clay. A map of the drainage basin is included in Appendix F. The average annual rainfall for the Conway area is approximately 51.4 inches. UCA's population for year 2015-2016 including students, faculty, and staff was approximately 11,754.

3.0 POTENTIAL SOURCES OF STORMWATER CONTAMINATION

In order to aid in the identification of pollutant sources, the Stormwater Management Committee will utilize information on historic stormwater issues as well as knowledge of day-to-day operations to identify activities and sources of potential pollutants of concern. The BMPs to address the pollutant sources and activities described on Table 3-1 will be developed and implemented as described in Section 5.0.

4.0 MINIMUM CONTROL MEASURES & BEST MANAGEMENT PRACTICES (BMPS)

"Minimum Control Measures" is the term used by the U.S. EPA and ADEQ for the six MS4 program elements aimed at achieving improved water quality. The Final Rule and permit specifies that a Phase II SWMP must include BMPs for the following six minimum control measures:

- Public Education and Outreach
- Public Participation/Involvement
- Illicit Discharge Detection and Elimination
- Construction Site Runoff Control
- Post-construction Runoff Control
- Pollution Prevention / Good Housekeeping

The goal of the SWMP is to reduce the discharge of pollutants and to identify activities or structural improvements that help reduce the quantity and improve the quality of the stormwater runoff. BMPs have been developed for the SWMP to reduce the discharge of pollutants to the storm drain system. BMPs include treatment controls, operating procedures, and practices to control site runoff, spills and leaks, sludge or waste disposal, or drainage from raw material storage. BMPs will be updated as appropriate to comply with any additions or changes to NPDES permit requirements.

4.1 BMPs to Meet Permit Requirements

The BMPs described for each control measure in Section 5.0 will be implemented by UCA staff and outside contractors. These BMPs were chosen to reflect the campus operation and the approach UCA has taken to implementing the minimum control measures. Whenever UCA staff or contractors perform work at UCA, the procedures outlined for each relevant BMP, or other proven technique that reaches the same goal, will be used in order to ensure compliance with stormwater discharge regulations.

UCA has already initiated many aspects of the BMPs listed in Section 5.0 of this SWMP. In some cases, the measure has not been formally documented as a written plan or program. The SWMP will document these existing BMPs and outline implementation of additional BMPs. Full development and implementation of BMPs will be completed through the 5-year implementation plan as presented in the following sections.

5.0 DEVELOPMENT AND IMPLEMENTATION OF BMPS

The BMPs will be implemented by the UCA students, faculty, and staff. Implementation will be the responsibility of specific campus groups/departments. Each BMP is associated with one or more of these groups/departments. The following list of acronyms identifies each group and department referenced in the following sections:

•	Stormwater Management Committee	SWMC
•	Environmental Health and Safety	EHS
•	Facilities Management	FM
•	Energy Management and Sustainability	EMS
•	Facilities Management Construction	FM-Constr
•	Housing / Housekeeping	Н
•	Student Government Association	SGA
•	Environmental Sciences/Biology	ESB
•	Geography	GEO
•	Legal Counsel	LC

5.1 Public Education and Outreach Regarding Stormwater Impacts

The goal of this minimum control measure is to ensure greater public awareness and compliance for the stormwater management program. Specifically, this minimum measure is intended to teach the "public" (students, faculty, staff, and contractors) using brochures, contract specifications, and personal contact the importance of protecting stormwater quality, for the benefit of both the environment and human health. Michelle Ellington or her designated representative will be responsible for overall management and implementation of the stormwater public education and outreach program. They will work in coordination with the Associate Vice President for Communications, Public Relations and Marketing. Permit Requirements:

- Implement a public education program to distribute educational materials to the students, faculty, staff, and contractors or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff. The stormwater public education and outreach program shall reach at least 50 percent of the population over the permit term.
- Determine the appropriate BMPs and measurable goals for this minimum control measure.
- Target at least 5 different themes related to stormwater during the term of the permit.

Implementation:

The proposed themes for public education and outreach are listed below:

- Year 1: Landscaping fertilizing and pesticide use
- O Year 2: Construction erosion, sediment control and post construction considerations
- O Year 3: Public Outreach cooperation between students/staff/contractors/faculty
- O Year 4: Illicit Discharges minor discharges of chemicals/oils/greases
- O Year 5: SPCCP larger discharges of chemicals such as fuels/pesticides/fertilizers

Table 5-1 presents selected BMPs for this minimum control measure. The table identifies the current status of each BMP as well as the implementation details, the implementation year, measurable goals, and the UCA departments that will be responsible for implementation.

5.2 Public Participation/Involvement

The goal of this control measure is to give the students/staff/faculty opportunities to play an active role in both the development and implementation of the stormwater program to gain a broader support in the development and decision making;

- Shorter implementation schedules due to fewer obstacles to acceptance of the program and an increased sources of volunteers.
- A broader base of expertise and free, intellectual resources.
- A conduit to other programs as students/faculty/staff involved in the stormwater program
 development process provide important cross-connections and relationships with other community
 and government programs.
- The University will participate in Earth Day and/or Eco Fest with the local community each year as its public involvement activities.

Permit Requirements:

- Comply with applicable State and local public notice requirements.
- Determine the appropriate BMPs and measurable goals for this minimum control measure.
- Include at least 5 public-involvement activities over the permit term.

Implementation:

The following activities will be planned for outreach/public involvement:

- O Year 1: Develop a booth for public involvement activities for Eco Fest or Earth Day
- O Year 2: Participate in at least one outreach activity to engage students/faculty/staff
- O Year 3: Participate in at least one outreach activity to engage students/faculty/staff
- O Year 4: Participate in at least one outreach activity to engage students/faculty/staff
- Year 5: Participate in at least one outreach activity to engage students/faculty/staff

Table 5-2 presents selected BMPs for this minimum measure. The table identifies the current status of each BMP as well as the implementation details, the implementation year, measurable goals, and the UCA departments that will be responsible for implementation. The target group for these BMPs will be students, faculty, staff, and contractors. The key committees/managers that will coordinate this work are the Storm Water Management Committee, Student Senate, Faculty Senate, Staff Senate, and Project Managers for Contractors.

5.3 Illicit Discharge Detection and Elimination

The goal of this minimum control measure is to reduce pollutants in stormwater runoff to receiving waters. It requires the development and implementation of a system to identify and eliminate sources of illicit discharge and illegal dumping.

Students, faculty, staff, and contractors will be informed of the hazards that are generally associated with illegal discharges and improper disposal of waste.

- O Students will be informed during the orientation process and given stormwater related brochures and personal contact information at that time.
- O Faculty will be given stormwater related brochures and personal contact information. The Stormwater Coordinator will schedule to attend a faculty meeting with each college to discuss stormwater once each school year.
- O Staff will be given stormwater related brochures and personal contact information. The Stormwater Coordinator will schedule to attend a staff meeting with each department to discuss stormwater once each year.
- On-site Contractors will be given the stormwater brochure and contract specifications. The Stormwater Coordinator will schedule to attend the initial contractor meeting to discuss stormwater implications of work.

Permit Requirements:

- Develop, implement, and enforce a program to detect and eliminate illicit discharges, as defined in Part 6 of this permit, into the small MS4.
- Develop a storm sewer system map, showing the location of all outfalls and the names and location of all surface waters of the State that receive discharges from those outfalls.
- Within five years of when the coverage under this general permit was granted, the storm sewer system map shall also include the entire MS4 system, including catch basins, pipes, ditches, and public and private stormwater facilities.
- Update the storm water sewer map annually.
- Perform annual dry weather screening of outfalls.
- Perform ADEQ recommended field tests of selected chemical parameters as indicators of discharge sources.
- Inform students, faculty, staff, and contractors of the hazards that are generally associated with illegal discharges and improper disposal of waste.
- Address the following categories of non stormwater discharges or flows (i.e., illicit discharges) only if the MS4 identifies them as significant contributors of pollutants to the small MS4: water line flushing, landscape irrigation, diverted stream flows, rising ground waters, uncontaminated ground

water infiltration (as defined at 40 CFR 35.2005(20)), uncontaminated pumped ground water, discharges from potable water sources, foundation drains, air conditioning condensation, irrigation water, springs, water from crawl space pumps, footing drains, lawn watering, individual residential car washing, flows from riparian habitats and wetlands, dechlorinated swimming pool discharges, street wash water, and discharges or flows from emergency firefighting activities (by definition, not an illicit discharge). Needs to be addressed if this is an issue or not.

- Develop a list of other similar occasional incidental non-stormwater discharges (e.g., non-commercial or charity car washes, etc.) that will not be addressed as illicit discharges.
- Document in the SWMP any local controls or conditions placed on occasional incidental nonstormwater discharges, such as car washes.

Implementation:

Table 5-3 presents selected BMPs for this minimum measure. The table identifies the current status of each BMP as well as the implementation details, the implementation year, measurable goals, and the UCA departments that will be responsible for implementation.

5.4 Construction Site Stormwater Runoff Control

The goal of this minimum control measure is to prevent soil and construction waste at construction sites from entering the stormwater conveyance system using city ordinances. Sites larger than one (1) acre must be included.

Permit Requirements:

- Develop and implement specifications that meet permit requirements for construction site operators to implement appropriate erosion and sediment control BMPs.
- Develop and implement requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality.
- Develop and implement procedures for pre-construction site plan review that incorporates consideration of potential water quality impacts.
- Develop and implement procedures for receipt and consideration of information submitted by the public.
- Develop and implement procedures for site inspection and enforcement of control measures.
- Sanctions. The plan to ensure compliance with the erosion and sediment control regulatory
 mechanism, including the sanctions and enforcement mechanisms that will be used to ensure
 compliance. Describe the procedures for when certain sanctions will be used.

Implementation:

Table 5-4 presents selected BMPs for this minimum measure. The table identifies the current status of each BMP as well as the implementation details, the implementation year, measurable goals and the UCA departments that will be responsible for implementation.

5.5 Post-Construction Stormwater Management

The goal for this minimum control measure is to reduce the generation of non-point source pollution from urban runoff through planning and design, prior to development or re-development. Post-construction runoff control focuses on site and design considerations, which are most effective when addressed in the planning and design stages of project development. Effective long-term management and maintenance are critical, so the best design opportunities are those needing the least amount of maintenance. The goal of the program is to integrate basic and practical stormwater-management techniques into new development to protect water quality.

Post-construction stormwater management controls include permanent structural and non-structural BMPs (e.g., conservation of natural and permeable areas, permeable pavers, rooftop runoff infiltration galleries, and mechanical storm drain filters) that remain in place after the project is completed. Projects subject to the new standards are new developments that create more impervious surface and redevelopment projects that replace one (1) or more acres of impervious surface (such as a parking lot). Once projects are completed the University will be responsible for the long term maintenance of the BMPs.

Permit Requirements:

- Develop and implement strategies which include a combination of structural and/or nonstructural best management practices (BMPs) on projects that disturb one or more acres.
- Ensure adequate long-term operation and maintenance of BMP
- Implement local ordinances for post construction runoff controls
- Determine the appropriate best management practices and measurable goals for this minimum control measure
- Develop policies for non-structural BMPs that provide requirements and standards to direct growth
 to identified areas, protect sensitive areas such as wetlands and riparian areas, maintain and/or
 increase open space (including a dedicated funding source for open space acquisition), provide
 buffers along sensitive water bodies, minimize impervious surfaces, and minimize disturbance of
 soils and vegetation
- Develop policies that encourage infill development in higher density urban areas, and areas with
 existing storm sewer infrastructure; education programs for developers and the public about
 project designs that minimize water quality impacts; and other measures such as minimization of
 the percentage of impervious area after development, use of measures to minimize directly
 connected impervious areas, and source control measures often thought of as good housekeeping,
 preventive maintenance and spill prevention.

Implementation:

Table 5-5 presents selected BMPs for this minimum measure. The table identifies the current status of each BMP as well as the implementation details, the implementation year, measurable goals, and the UCA departments that will be responsible for implementation.

Please refer to section 7.0 for additional construction BMPs that may apply to contractors.

5.6 Pollution Prevention/Good Housekeeping For Facilities Operations and Maintenance The goal of this minimum control measure is to assure that UCA facility operations and maintenance activities occur in a manner protective of stormwater quality.

Permit Requirements:

- Develop and implement an operation and maintenance program with the ultimate goal of preventing or reducing pollutant runoff from Campus operations into the storm sewer system.
- Develop employee training on how to incorporate pollution prevention/good housekeeping
 techniques into campus operations such as; grounds and open space maintenance, fleet maintenance
 and building maintenance, new construction and land disturbances, and stormwater system
 maintenance using training materials that are available from EPA, their State or relevant
 organizations.
- Determine the appropriate best management practices (BMPs) and measurable goals for this minimum control measure.

Implementation:

Table 5-6 presents selected BMPs for this minimum measure. The table identifies the current status of each BMP as well as the implementation details, the implementation year, measurable goals and the UCA departments that will be responsible for implementation.

6.0 RECORD KEEPING 6.1 SWMP Updating

The SWMP will be reviewed annually by the SWMC. UCA will update the SWMP whenever changes in activities or operations occur that may significantly affect the discharge of stormwater pollutants. In the event UCA identifies additional BMPs or stormwater controls, not outlined in this plan, UCA may modify the SWMP and notify ADEQ is writing of such changes. If a control or BMP is deemed ineffective, UCA may request authorization to modify the BMP or control by notifying ADEQ of the proposed changes in writing. Unless denied, such requested changes may be implemented 60 days after submitting the request. A request for a modification must include:

- 1. Analysis of why the practice is ineffective (including cost prohibition).
- 2. The expected effect of the new practice.
- 3. Analysis of why the new practice will achieve the intended goals.

Requests for modification must be in writing and signed by a senior executive officer having responsibility for the overall operations of the organization.

Modifications of the SWMP may be required by ADEQ to address impacts on receiving water quality caused or contributed to, by discharges from UCA or to include more stringent requirements necessary to comply with new federal or state statutory or regulatory requirements, or surface water quality standards. ADEQ may also require modification of this plan at any time it determines that the plan does not meet permit requirements. Upon notification of required modifications by ADEQ, UCA must make the required changes and submit a written statement certifying that the changes have been made.

6.2 Monitoring

UCA discharges stormwater to receiving streams subject to Total Maximum Daily Load requirements. UCA is not currently subject to monitoring requirements.

6.3 Record Keeping

The stormwater permit requires UCA to retain all required records including a copy of the NPDES permit, records of all data used to complete the Notice of Intent, and annual reports for a period of at least three (3) years or for the term of permit, whichever is longer. The Tables are listed in Appendix A of this document, the Notice of Intent (NOI) in Appendix B, the NPDES permit will be filed in Appendix C and the annual reports will be filed in Appendix D. Correspondence regarding administration of this SWMP can be filed in Appendix E. This period may be extended by request of the permitting authority at any time. UCA shall submit any records to the permitting authority upon request. UCA must also make all records, including the notice of intent (NOI) and the description of the SWMP, available to the public if requested in writing.

6.4 SWMP Annual Reports

The university must submit annual reports to the ADEQ for each year of the permit term. The first report is due 15 months from the effective date of the permit, covering the activities of the permittee during the 12 months from the effective date of the permit. Subsequent annual reports are due on the same date for each of the following years during the remainder of the permit term. The reporting date for UCA will be April XX of each year. The first submission will be July XX, 2017. The report will summarize the activities performed throughout the previous 12 months for the reporting period (April XX through April XX) and must include the following:

- The status of compliance with permit conditions.
- An assessment of the appropriateness of the identified BMPs and the progress towards achieving the measurable goals for each of the minimum control measures.
- Results of information collected and analyzed, including monitoring data, if any, during the reporting period.
- A summary of the stormwater activities UCA plans to undertake during the next reporting cycle, including an implementation schedule.
- · Any proposed changes to the SWMP along with justification of why the changes are necessary.
- Description and schedule for implementation of additional proposed BMPs.
- Annual Reports must be submitted to the.

Arkansas Department of Environmental Quality

P. O. Box 8913

Little Rock, Arkansas 72219-8913

Attention: Stormwater Section

7.0 Construction Program

The Phase II Final Rule requires operators of Phase II small construction sites, nationally, to obtain an NPDES permit and implement practices to minimize pollutant runoff.

Permit Requirements:

- Submission of a Notice of Intent (NOI) that includes general information and a certification that the activity will not impact endangered or threatened species.
- Development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) with appropriate BMPs to minimize the discharge of pollutants from the site; and
- Submission of a Notice of Termination (NOT) when final stabilization of the site has been achieved as defined in the permit or when another operator has assumed control of the site.

Table 7-1 presents selected BMPs for Small Construction Sites. The table identifies the current status of each BMP as well as the implementation details, the implementation year, measurable goals and the UCA departments that will be responsible for implementation.

Appendix A. Pollutant and BMP Tables

Table 3-1. Potential Pollutants

Pollutant Activity/Sources Activity/Source	Pollutants of Concern
Building maintenance	Wash water, paint chips, cleaning products, dirt and sediment
Chemical spills	Various cleaning compounds, diesel, paint, hazardous materials, vehicle fluids
Cooling tower / boiler blow down	Various water treatment chemicals
Construction activities	Concrete, drywall, paint, erosion sediment, construction debris
Food service operations	Wash water, food residue, oil and grease
Grounds maintenance	Green waste, fuel, oil, pesticides, herbicides, sediment
Impervious areas	Increased flows and pollutant loading
Irrigation runoff	Fertilizers, pesticides, reclaimed water
Litter and debris	Litter and debris
Loading/unloading areas	Petroleum products, fertilizers, pesticides, herbicides, cleaning solutions, paint
Outdoor storage of raw materials	Sand, asphalt, soil, pesticides, herbicides, fertilizer, paint, solvents, fuel
Painting	Paint or rinse water (oil and water based), paint thinner
Parking lot runoff	Oil/grease, litter
Roof runoff	Particulate matter and associated pollutants
Sewer line blockages/seepage	Raw sewage
Trash storage areas	Organic materials, hazardous materials
Vehicle and equipment washing	Cleaning products, oil/grease, vehicle fluids

Table 5-1. BMP Implementation: Public Education and Outreach

Year	ВМР	Current	Implementation Details	Measurable	UCA
		Status		Goal	Depts.
1	Forming Partnerships	None	Form a partnership with EPA, ADEQ, and the City of Conway to learn more about stormwater.	Get material and training available through them	FM EHS
1	On-line links to stormwater education materials	None	Discover links to existing websites with stormwater information and materials. Add to the UCA Physical Plant website.	Development of stormwater links on the Physical Plant web page	EHS
1	Identify available stormwater education materials and brochures	None	Review materials available from ADEQ, EPA and other agencies will be identified. UCA will review these materials and decide which materials to use with other BMPs.	Number of items reviewed.	EHS
2	UCA stormwater brochure	None	Create and distribute a brochure for the UCA campus.	Number of brochures distributed	SWMC
2	Student education	None	Student Orientation - Include stormwater awareness material during orientation. Include information about local stream teams on campus.	Number of students oriented	PD,FM, H, SGA
2	Employee awareness	None	Incorporate stormwater education into new employee orientation and existing employee safety meetings.	Employees receiving orientation	FM, EHS, Provost
2	Contractor awareness	None	Incorporate stormwater education into new contractor orientation and existing employee safety meetings.	Employees receiving orientation	Purchasing FM- Constr
3-5	Distribute stormwater awareness brochures	None	UCA will continue to distribute materials on campus to promote stormwater awareness.	Number of brochures distributed	SWMC

Table 5-2. BMP Implementation: Public Participation/Involvement

Year	ВМР	Current Status	Implementation	Measurable Goal	UCA Depts.
1	Stormwater Management Committee (SWMC)	Form this committee and make assignments	The SWMC will meet semi-annually (2 times per year). The group will review progress of BMPs, active construction site status, new development and other stormwater topics.	Number of meetings held	EHS, FM, FM-Con, H, SGA, LC, ESB, PD
2	Investigate the Arkansas Stream Team program	Active	Evaluate the potential for UCA to revitalize the Stream Team program	Commit volunteers to the Stream Team Program	EHS, ESB
3-5	Participate in community awareness events	None	Evaluate participation in Earth Day/ Eco Fest type activities. Provide a display and stormwater education materials at appropriate on-campus events.	Number of events attended	SGA, EHS, ESB
4	Write Articles	None	Provide articles for publication on different aspects of stormwater awareness. Articles to be published at least annually.	Number of articles written	EHS, SGA, ESB

Table 5-3. BMP Implementation: Illicit Discharge Detection and Elimination

Year	ВМР	Current Status	Implementation Details	Measurable Goal	UCA Depts.
1	Develop a plan to address illicit discharges.	None	Develop and implement a stormwater/illicit discharge plan to locate problem areas, find the source and remove/correct illicit connections.	Documentation of actions taken	EHS
1	Develop an inspection checklist for outfalls	None	Develop a program and checklist for visual inspection of stormwater outfalls.	Checklist	EHS
1-5	Visual inspection of outfalls during dry weather	None	Inspect and identify illicit discharges (IDs) identified by this program and report to EH&S for follow-up as necessary.	Report of inspections performed	EHS
1	Develop a map of stormwater conveyance system for UCA	Started	Develop an initial map of the stormwater conveyance system including outfalls and receiving streams.	Мар	FM GEO
2-3	Refine map of stormwater conveyance system for UCA	Noné	Additional detail and flows shall be added.	Updated Map	FM, EHS, GEO
1-5	Coordinate with the City of Conway	None	Conway is an adjacent MS4 and will be sent a copy of the annual report, which would include any illicit influents or discharges.	Submit annual report to City of Conway	FM
1	Review local controls on occasional nonstormwater discharges	None	Review and document in the SWMP any local controls or conditions placed on occasional incidental nonstormwater discharges.	Documented review	FM
1	Review campus sources of non- stormwater discharges	None	Review campus for sources of listed non-stormwater discharges as possible significant contributors of pollutants. Look for occasional incidental non-stormwater discharges.	Number of trainings	EHS

Table 5-4. BMP Implementation: Construction Site Stormwater Runoff Control

Year	ВМР	Current Status	Implementation Details	Measurable Goal	UCA Depts.
1	Update UCA specifications to address construction erosion and sediment control requirements	Contract language exists	Review will address erosion and sedimentation control requirements, and require that construction contractors be responsible for filing under the General Permit. Contractors will be required to submit a Stormwater Pollution Prevention Plan (SWPPP) to the Project Manager. Specifications will be included in the contracts for construction projects.	Completed SWPPP for each construction contract disturbing over one (1) acre	FM–Constr, EHS, Purchasing, LC
1	Develop SWPPP outline for construction contractors.	Review existing practices	EHS will develop a Site Specific SWPPP skeleton and the construction contractor will develop the site specific SWPPPs.	SWPPP outline available for contractors	EHS/ FM- Constr
1	Develop a procedure for receipt and consideration of public inquiries	None	Develop procedures for the receipt and consideration of public inquiries, concerns, and information regarding construction activities. Create a tracking tool for these receipts. Web based.	Receipts of inquiries	EHS
1-5	100% Site plan review for construction contracts.	Review existing guidelines	Review site plans for all projects disturbing over one acre of land.	Number of plans reviewed	EHS/ FM- Constr
1-5	Monthly inspection of construction sites	Project Manager responsible	Develop a checklist of items to be included in routine inspections of construction sites.	Number of inspections and violations	EHS
2-5	Enforcement of non- compliance with stormwater requirements	Project Manager responsible	Provide enforcement mechanism for non-compliance of contractors with stormwater discharge requirements. This will involve coordination of Construction Contract Coordinator, EHS, UCA legal department	Enforcement policies and procedures established	EHS/FM- Constr, LC

Table 5-5. BMP Implementation: Post-Construction Stormwater

Year	ВМР	Current Status	Implementation Details	Measurable Goal	UCA Depts.
1	Contract language for specifications for stormwater management in post construction phase.	None	Identify appropriate contract language to address post construction requirements for stormwater managements for construction projects.	Contract modification completed	EHS, FM- Constr, LC, Purchasing
1	Design review to include consideration of structural BMPs	None	Promote improved water quality by use of porous pavement, filter strips, artificial wetlands, grassy swells and rain gardens	Number of designs reviewed	EHS FM- Constr
2	Develop policies for non-structural BMPs	None	Develop policies that provide requirements and standards to direct growth to identified areas. Maintenance of campus.	Approval of policies for sensitive areas, open space, buffers, impervious surfaces	EHS
3	Enhance the design review cycle to include other UCA departments associated with stormwater quality	None	Expand the design review group to include the SWMC, grounds, engineering, and other relevant organizations	Other Departments included	FM- Constr,

Table 5-6. BMP Implementation: Pollution Prevention/Good Housekeeping

Year	ВМР	Current Status	Implementation Details	Measurable Goal	UCA Depts.
1	Street sweeping	Existing	Review existing street sweeping program	Frequency	FM
1-5	Inspection of parking lots	Existing	Parking lot inspections will be conducted and work orders written for storm drain maintenance	Number of parking lot inspections	FM
1-5	Trash cleanup	Existing	Trash pickers are employed to pick up trash around campus areas.	Hours of trash pickup	FM
1-5	Recycling	Existing	Recycling collection sites are available for aluminum cans, paper, and scrap metal.	Record volume of materials collected	FM
1-5	Provide Physical Plant employees training	None	Train appropriate employees on storm water, waste management and recycling programs	Number of personnel trained	EHS/FM
2	Establish procedures for new flood management projects	None	Assess new flood management projects for impacts on water quality and existing projects are assessed for incorporation of additional water quality protection devices or practices.	Number of projects reviewed	SWMC, FM
2	Review storm drain maintenance and cleaning program	Clean-up after each storm event	Update the master list of stormwater conveyances, and outfalls, establish a maintenance schedule, and initiate additional maintenance as needed.	Institute a preventive maintenance workorder outline periodic cleanout	FM

Table 7-1. BMP Implementation: Construction Sites

Years	ВМР	Current Status	Implementation Details	Measurable Goal	UCA Depts.	
1-5	Minimizing Disturbance	Existing	Non-Structural Continue existing program	Acres disturbed	FM - Constr	
1-5	Preserving Natural Vegetation	Existing	Preserve as much of the natural vegetation as possible by replanting or preserving removed vegetation	Number of plants preserved/replanted	FM - Constr	
1-5	Good Housekeeping Practices	Existing	Daily pick up trash on the site	Hours of trash pickup	FM - Constr	
	Structural					
1-5	Erosion Control	Existing	Use mulch, grass or other stabilizing materials to minimize soil loss	Area covered	FM Constr	
1-5	Sediment Control	Existing	Install silt fencing, drain protection, dams, sediment traps as needed to prevent washing of soil. Stabilize construction entrances.	Number of locations and/or measures taken	FM Constr	
1-5	Inspect sediment controls and drains associated with construction sites after a Storm event	Clean as needed following storm event	Identify sediment controls, conveyances, and outfalls associated with the construction site	Number of inspections, debris removed	FM Constr	

Appendix C. NPDES Permit

Appendix D. Annual Reports

Appendix E. Correspondence



CERTIFIED MAIL: RETURN RECEIPT REQUESTED (91 7199 9991 7035 3550 9603)

JUN 21 2016

Tom Courtway President, University of Central Arkansas 201 Donaghey Ave. Conway, AR 72035

RE: Small Municipal Separate Storm Sewer System (MS4) General Permit ARR040000

Dear Mr. Courtway,

During an audit on the MS4 program of the City of Conway, it came to the attention of the Department that the University of Central Arkansas (UCA) does not have coverage under the MS4 general permit. Based on the large student population, population density, the receiving stream of Stone Dam Creek (impaired for ammonia, nitrates, and zinc), and the location being interconnected with the Conway MS4, the Department is requiring UCA to obtain coverage for stormwater discharges under the MS4 general permit, ARR040000, in accordance with 40 CFR 123.35(b)(4).

Under Part 2.3 of the MS4 general permit, the MS4 may jointly submit a Notice of Intent (NOI) with one or more MS4s. In this case, working out an agreement with the City of Conway may be acceptable. The City of Conway must update and notify ADEQ of the update in SWMP in accordance with Part 3.4.2.1 of the MS4 general permit.

Additionally, UCA and the City of Conway may choose to share responsibility for one or more of the minimum measures discussed in the permit in lieu of submitting a joint NOI. Any sharing of responsibility must be done in accordance with Part 3.3 of the MS4 general permit.

Part 2.1.2 of ARR040000 requires that you submit an application for coverage within 180 days of this notification from the Department. The application includes a Notice of Intent (NOI), a Stormwater Management Program (SWMP) outline, and a \$200.00 permit application fee. The NOI is attached to this correspondence. The SWMP requirements can be found in Part 3 of ARR040000, which is also attached to this correspondence. The completed application should be received by the Department no later than 180 days after the date of this letter, at the following address or email address:

Arkansas Department of Environmental Quality Permits Branch, Office of Water Quality 5301 Northshore Drive North Little Rock, AR 72118-5317

via email:

water-permit-application@adeq.state.ar.us

Digital copies of the permit and NOI, as well as additional information regarding the permit can be found on the Department's website at the address below: https://www.adeq.state.ar.us/water/permits/npdes/stormwater/

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
5301 NORTHSHORE DRIVE / NORTH LITTLE ROCK / ARKANSAS 72118-5317 / TELEPHONE 501-682-0744 / FAX 501-682-0880
www.adeq.state.or.us



If you have any questions concerning this matter or need additional information, please feel free to contact Blake Ahrendsen of my staff at (501) 682-0626.

Sincerely,

Robert E. Blanz, PhD, PE

Acting Senior Operations Manager Office of Water Quality

RB:ba

Attachments: Notice of Intent

ARR040000

cc: Electronic Files (ARR040000)

Richard Healey, Branch Manager, Enforcement Branch

7/17/2017
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MS4 Permit for UCA
31 messages
University of Central Arkansas Mail - MS4 Permit for UCA
Virgil Ellis <vellis@uca.edu></vellis@uca.edu>
Virgil Ellis <vellis@uca.edu></vellis@uca.edu>
To: Blake < Ahrendsen@adeq.state.ar.us>
Cc: Yvonne Michelle Ellington <mellington@uca.edu></mellington@uca.edu>
Blake,
Please give me an update on the status of the permit application for UCA's MS4 permit.
Thanks,
Ed Ellis
UCA
Ahrendsen, Blake <ahrendsen@adeq.state.ar.us></ahrendsen@adeq.state.ar.us>

To: Virgil Ellis \leq vellis@uca.edu \geq

Cc: Yvonne Michelle Ellington
 <mellington @uca.edu>

Ed,

I am sorry I am just getting to this. For some reason, it was sent to my junk folder.

Wed, Nov 30,2016 at 6:50 AM

Thu, Dec 1,2016 at 3:01 PM

I have looked through the mail log, as well as my email history, and as far as I can tell, an NOI has not yet been

received.

Blake Ahrendsen

501-682-0626

From: Virgil Ellis [mailto:vellis@uca.edu]

Sent: Wednesday, November 30, 2016 6:50 AM

To: Ahrendsen, Blake

Cc: Yvonne Michelle Ellington

Subject: MS4 Permit for UCA

[Quoted text hidden]

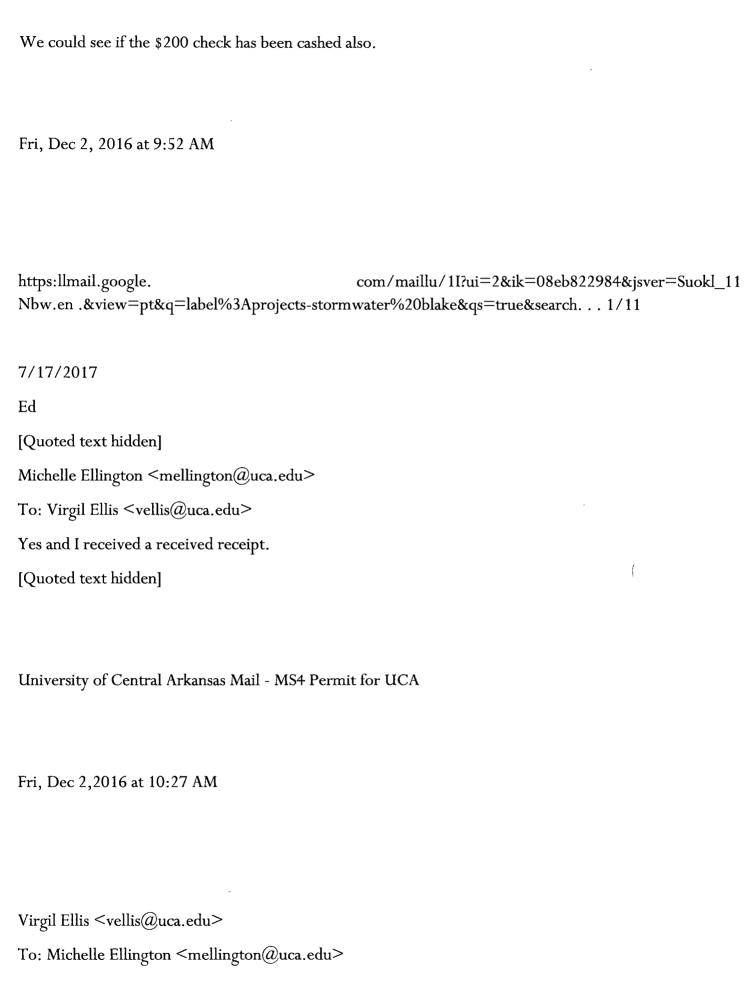
Virgil Ellis <vellis@uca.edu>

To: Yvonne Michelle Ellington <mellington@uca.edu>

Michelle,

Did you sent the permit application by registered mail?

We need to track it down.



ok, We need to talk it through with them. If you will give me the receipt, I will follow up with Blake. Ed [Quoted text hidden] Virgil Ellis < vellis@uca.edu> To: Michelle Ellington < mellington@uca.edu> Ok, We need to talk it through with them. If you will give me the receipt, I will follow up with Blake. Ed On Fri, Dec 2,2016 at 10:27 AM, Michelle Ellington <mellington@uca.edu> wrote: [Quoted text hidden] Michelle Ellington <mellington@uca.edu> To: Virgil Ellis <vellis@uca.edu> Ed, I have attached the received receipt. Thanks for your help with this, Michelle On Dec 2,20169:53 AM, "Virgil Ellis" < vellis@uca.edu > wrote:

[Quoted text hidden]

 \sim MS4 Delivery Receipt.pdf

219K

Virgil Ellis < vellis@uca.edu>

To: "Ahrendsen, Blake" < Ahrendsen@adeq.state.ar.us>

Cc: Yvonne Michelle Ellington <mellington@uca.edu>

Blake,

We sent it certified mail. Attached is a copy of the proof of delivery.

Please let me know if you find it, otherwise we can send another copy.

Ed Ellis

Mon, Dec 5,2016 at 8:10 AM

Mon, Dec 5,2016 at 8:14 AM

Mon, Dec 5,2016 at 10:18 AM

Mon, Dec 5, 2016 at 1:23 PM

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7/17/2017

UCA

[Quoted text hidden]

 \sim MS4 Delivery Receipt.pdf

223K

University of Central Arkansas Mail - MS4 Permit for UCA

Ahrendsen, Blake < Ahrendsen@adeq.state.ar.us>

To: Virgil Ellis < vellis@uca.edu>

Using that information, I was able to find it. Thank you.

From: Virgil Ellis [mailto:vellis@uca.edu]

Sent: Monday, December 05,2016 1:23 PM

To: Ahrendsen, Blake

Cc: Yvonne Michelle Ellington

Subject: Re: MS4 Permit for UCA

Blake,

We sent it certified mail. Attached is a copy of the proof of delivery.

Please let me know if you find it, otherwise we can send another copy.

Ed Ellis

UCA

On Thu, Dec 1,2016 at 3:01 PM, Ahrendsen, Blake < Ahrendsen@adeq.state.ar.us > wrote:

Ed,

I am sorry I am just getting to this. For some reason, it was sent to my junk folder.

Mon, Dec 5, 2016 at 1:54 PM

I have looked through the mail log, as well as my email history, and as far as I can tell, an NOI has not yet been

received.

Blake Ahrendsen

501-682-0626

From: Virgil Ellis [mailto:vellis@uca.edu]

Sent: Wednesday, November 30,20166:50 AM

To: Ahrendsen, Blake

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com/mail/u/1/?ui=2&ik=08eb822984&jsver=Suokl_11

Nbw.en .&view=pt&q=label%3Aprojects-stormwater"1020blake&qs=true&search _ _ _ 3/11

7/17/2017

Cc: Yvonne Michelle Ellington

Subject: MS4 Permit for UCA

Blake,

University of Central Arkansas Mail - MS4 Permit for UCA

Please give me an update on the status of the permit application for UCA's MS4 permit.

Thanks,

Ed Ellis

UCA

Virgil Ellis < vellis@uca.edu>

To: "Ahrendsen, Blake" < Ahrendsen@adeq.state.ar.us>

Blake,

Have we been released from the requirement to have a MS4 Permit?

If this is the case we will begin working with the City of Conway on their MS4.

Ed Ellis

University of Central Arkanas

Ahrendsen, Blake < Ahrendsen@adeq.state.ar.us>

To: Virgil Ellis <vellis@uca.edu>

Ed,

This is not the case. Did someone tell you otherwise?

From: Virgil Ellis [mailto:vellis@uca.edu]

Sent: Wednesday, January 25, 2017 1:31 PM

To: Ahrendsen, Blake

[Quoted text hidden]

[Quoted text hidden]

Virgil Ellis < vellis@uca.edu>

To: "Ahrendsen, Blake" < Ahrendsen@adeq.state.ar.us>

I thought it was being considered.

[Quoted text hidden]

Ahrendsen, Blake < Ahrendsen@adeq.state.ar.us>

Wed, Jan 25, 2017 at 1:31 PM

Wed, Jan 25,2017 at 2:11 PM

Wed, Jan 25, 2017 at 3:02 PM

Wed, Jan 25, 2017 at 3:04 PM

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Nbw.en .&view=pt&q=label%3Aprojects-stormwater"1020blake&qs=true&search. . . 4/11

7/17/2017

To: Virgil Ellis < vellis@uca.edu>

I haven't heard anything about that. The hold up is that a new rule was passed recently regarding small MS4s and we

are making sure that we are getting everything right.

From: Virgil Ellis [mailto:vellis@uca.edu]

Sent: Wednesday, January 25, 2017 3:03 PM

[Quoted text hidden]

[Quoted text hidden]

Virgil Ellis <vellis@uca.edu>

To: "Ahrendsen, Blake" < Ahrendsen@adeq.state.ar.us>

Wed, Jan 25,2017 at 4:16 PM

OK

I visited with Becky Keogh, January 4, on another matter and she had asked Mitch Rouse to review the need for UCA to

have an MS4 permit.

I haven't heard anything back.

Ed

Ahrendsen, Blake < Ahrendsen@adeq.state.ar.us>

To: Virgil Ellis <vellis@uca.edu>

I hadn't heard about this. I will ask around.

From: Virgil Ellis [mailto:vellis@uca.edu]

Sent: Wednesday, January 25, 20174:17 PM

To: Ahrendsen, Blake

Subject: Re: MS4 Permit for UCA

OK

[Quoted text hidden]

Virgil Ellis < vellis@uca.edu>

To: "Ahrendsen, Blake" < Ahrendsen@adeq.state.ar.us>

ok

Ed

[Quoted text hidden]

Virgil Ellis < vellis@uca.edu>

To: Blake < Ahrendsen@adeq.state.ar.us >

Cc: Yvonne Michelle Ellington mellington@uca.edu, Larry Lawrence Iarry Lawrence Iarry Lawrence <a href=

Blake,

Thu, Jan 26, 2017 at 12:27 PM

Thu, Jan 26, 2017 at 12:44 PM

Mon, Mar 20,2017 at 7:59 AM

It has been about 3 months since we last communicated about the MS4 permit process.

At that time you said a new rule had been passed regarding small MS4s, delaying the permitting process.

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com/mail/u/1/?ui=2&ik=08eb822984&jsver=Suokl_I1

Nbw.en .&view=pt&q=label%3Aprojects-stormwater%20blake&qs=true&search. . . 5/11

7/17/2017

University of Central Arkansas Mail - MS4 Permit for UCA

Please give me an update on the new rules and if there is any actions UCA should be taking at this time.

Ed Ellis

Energy Management and Sustainability

University of Central Arkansas

Ahrendsen, Blake < Ahrendsen@adeq.state.ar.us>

To: Virgil Ellis < vellis@uca.edu>

Cc: Yvonne Michelle Ellington mellington@uca.edu, Larry Lawrence Larry Lawrence larryl@uca.edu

Thanks for checking in Ed.

We actually came to a decision late last week.

Mon, Mar 20, 2017 at 8:41 AM

To continue the permitting process, we have determined that the outline of a SWMP you submitted is no longer

sufficient to gain coverage under the permit. Please give me a call when you get a chance, so that we may discuss a

timeline and what a complete SWMP entails.

Blake Ahrendsen

501-682-0626

From: Virgil Ellis [mailto:vellis@uca.edu]

Sent: Monday, March 20, 2017 8:00 AM

To: Ahrendsen, Blake

Cc: Yvonne Michelle Ellington; Larry Lawrence

Subject: MS4 Permit for UCA

Blake,

[Quoted text hidden]

Virgil Ellis < vellis@uca.edu>

To: Blake < Ahrendsen@adeq.state.ar.us>

Cc: Yvonne Michelle Ellington mellington@uca.edu, Larry Lawrence larry Lawrence <a href="mel

Michelle,

Mon	Mar	20	2017 at	12.	32	PM
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I talked to Blake at ADEQ. He confirmed that we would have to submit a plan to get a permit. The outline is no longer

sufficient.

He said he will give us a checklist to help us insure we have a complete plan.

Once we have the plan together, we will need to get UCA staff to review it before submitting to ADEQ.

Once ADEQ has reviewed the plan, it will go out for public comment before ADEQ will approve the plan.

Ed

[Quoted text hidden]

Michelle Ellington <mellington@uca.edu>

To: Virgil Ellis <vellis@uca.edu>

Mon, Mar 20,2017 at 1:21 PM

htlps:llmail.goog Ie. com/mail/u/1/?ui=2&ik=08eb822984&jsver=Suokl_11 Nbw.en .&view=pt&q=label%3Aprojects-stormwater%20blake&qs=true&search. . . 6/11

7/17/2017

Okay, thanks for the update Ed.

Michelle Ellington

University of Central Arkansas

Director of Energy and Sustainability

mellington@uca.edu

501-450-3610

[Quoted text hidden]

University of Central Arkansas Mail - MS4 Permit for UCA

Ahrendsen, Blake < Ahrendsen@adeq.state.ar.us>

To: Virgil Ellis < vellis@uca.edu>

Wed, Mar 22,2017 at 9:12 AM

Sorry for the delay on this. I've been having a back and forth with the EPA making sure our checklist is good.

Hopefully I'll have it to you soon.

From: Virgil Ellis [mailto:vellis@uca.edu]

Sent: Monday, March 20, 2017 12:32 PM

To: Ahrendsen, Blake

Cc: Yvonne Michelle Ellington; Larry Lawrence

Subject: Re: MS4 Permit for UCA

Michelle,

[Quoted text hidden]

[Quoted text hidden]

Ahrendsen, Blake < Ahrendsen@adeq.state.ar.us>

To: Virgil Ellis < vellis@uca.edu>

Cc: Yvonne Michelle Ellington mellington@uca.edu, Larry Lawrence Iarry Lawrence Iarry Lawrence <a href=

Mon, Mar 27,2017 at 4:26 PM

Sorry for the delay, but I have attached our MS4 checklist. Please contact me if you have any questions. I'll be glad to

help.

Blake Ahrendsen

501-682-0626

From: Virgil Ellis [mailto:vellis@uca.edu]

Sent: Monday, March 20, 2017 12:32 PM

To: Ahrendsen, Blake

Cc: Yvonne Michelle Ellington; Larry Lawrence

Subject: Re: MS4 Permit for UCA

Michelle,

[Quoted text hidden]

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7/17/2017

~ SWMP Review Checklist.doc

126K

University of Central Arkansas Mail - MS4 Permit for UCA

Wed, Mar 29, 2017 at 7:34 AM

Virgil Ellis < vellis@uca.edu>

To: "Ahrendsen, Blake" < Ahrendsen@adeq.state.ar.us>

I will be in NYC this week, but shared this information with Michelle yesterday. She is going to review the plan we

developed last September and look at activating the committee recommended in the plan and let them review the plan

before submission to ADEQ. We want to make sure the plan is consistent with the checklist. This will take more than the

30 days we talked about before getting the checklist

Sent from my iPhone

[Quoted text hidden]

<SWMP Review Checklist.doc>

Ahrendsen, Blake < Ahrendsen@adeq.state.ar.us>

To: Virgil Ellis < vellis@uca.edu>

What kind of timeline are you thinking?

From: Virgil Ellis [mailto:vellis@uca.edu]

Sent: Wednesday, March 29, 2017 7:35 AM

To: Ahrendsen, Blake

[Quoted text hidden]

[Quoted text hidden]

Thu, Mar 30, 2017 at 10:39 AM

Tue, Apr4, 2017 at4:10 PM

Virgil Ellis < vellis@uca.edu>

To: Yvonne Michelle Ellington <mellington@uca.edu>

Wanted to make sure you saw this. Blake would like to know how long it will take for us to get our plan approved and

submitted.

Ed

----- Forwarded message -----

From: Ahrendsen, Blake < Ahrendsen@adeq.state.ar.us>

Date: Thu, Mar 30, 2017 at 10:39 AM

Subject: RE: MS4 Permit for UCA

To: Virgil Ellis <vellis@uca.edu>

Michelle Ellington <mellington@uca.edu>

To: "Ahrendsen, Blake" < Ahrendsen@adeq.state.ar.us>

Cc: Virgil Ellis <vellis@uca.edu>

Blake,

Fri, Apr 14, 2017 at 2:41 PM

We are in the process of reviewing the checklist and comparing it to our current draft plan and construction specifications. We have questions regarding some of the items on the checklist. Would it be possible to schedule a

conference call for sometime early next week to discuss?

Ie.

I look forward to hearing from you.

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com/mail/u/1/?ui=2&ik=08eb822984&jsver=Suokl_11

Nbw.en .&view=pt&q=label%3Aprojects-stormwater%20blake&qs=true&search. . . 8/11

7/17/2017

I hope you have a great weekend.

Michelle

Michelle Ellington

University of Central Arkansas

Director of Energy and Sustainability

mellington@uca.edu

501-450-3610

Michelle Ellington <mellington@uca.edu>
To: Virgil Ellis <vellis@uca.edu>
Ed,

University of Central Arkansas Mail - MS4 Permit for UCA

Fri, Apr 14, 2017 at 2:51 PM

I'd like to schedule this call for sometime Tuesday afternoon if that works for you.

Have a great weekend!

Michelle

Michelle Ellington

University of Central Arkansas

Director of Energy and Sustainability

mellington@uca.edu

501-450-3610

----- Forwarded message -----

From: Ahrendsen, Blake < Ahrendsen@adeq.state.ar.us>

Date: Fri, Apr 14, 2017 at 2:45 PM

Subject: RE: MS4 Permit for UCA

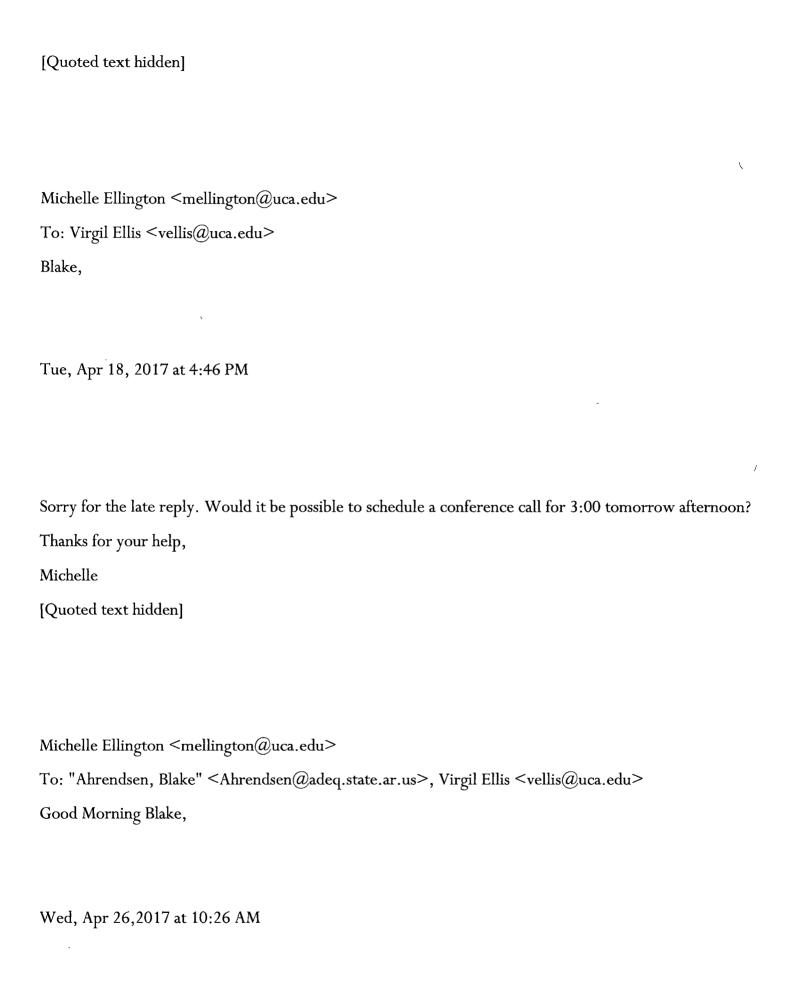
To: Michelle Ellington <mellington@uca.edu>

Of course. My calendar is open on Monday and Tuesday. Just let me know what works for you and I'll make it happen.

Have a good weekend!

From: Michelle Ellington [mailto:mellington@uca.edu]
Sent: Friday, April 14,20172:41 PM
To: Ahrendsen, Blake
Cc: Virgil Ellis
[Quoted text hidden]
Virgil Ellis <vellis@uca.edu></vellis@uca.edu>
Mon, Apr 17, 2017 at 8:57 AM
https://mail.go.go.
https:llmail.google. com/mail/u/1/?ui=2&ik=08eb822984&jsver=Suokl_11 Nbw.en.&view=pt&q=label%3Aprojects-stormwater"1020blake&qs=true&search 9/11
7/17/2017
University of Central Arkansas Mail - MS4 Permit for UCA
To: Michelle Ellington mellington@uca.edu
Tomorrow afternoon works for me.

Ed



I just wanted to touch base with you regarding the progress of our SWMP. This week we are meeting with key personnel

and working to finalize our draft before we present it to the Physical Plant Director, Larry Lawrence, on May 2.

Afterwards a committee will meet to discuss and review the plan, once any necessary edits are made the plan will be

forwarded to the Legal Department for review.

While I can not confidently project how long this process will take, I can say that we are diligently working to move

through this process as quickly and efficiently as possible. Larry, Ed and I are committed to formulating a realistic,

workable SWMP that will help us stay in compliance with the CW A.

I will keep you updated as we move through this process, please let me know if you have any questions,

Thanks for your patience,

Michelle

Michelle Ellington

University of Central Arkansas

Director of Energy and Sustainability

mellington@uca.edu

501-450-3610

----- Forwarded message -----

From: Michelle Ellington <mellington@uca.edu>

Date: Tue, Apr 18, 2017 at 4:46 PM

Subject: Re: MS4 Permit for UCA

Ahrendsen, Blake < Ahrendsen@adeq.state.ar.us>

To: Michelle Ellington <mellington@uca.edu>, Virgil Ellis <vellis@uca.edu>

Thanks for the update.

Wed, Apr 26,2017 at 10:31 AM

https:llmail.google.com/maillu/1/?ui=2&ik=08eb822984&jsver=Suokl_11 Nbw.en .&view=pt&q=label%3Aprojects-stormwater%20blake&qs=true&searc. . . 10/11

7/17/2017

University of Central Arkansas Mail - MS4 Permit for UCA

The email below requested a time for a conference call, but it wasn't sent to me. If you all are still wanting to do so,

let me know when and I will do my best to make it happen. It looks like my afternoons are free this week.

From: Michelle Ellington [mailto:mellington@uca.edu]

Sent: Wednesday, April 26, 2017 10:27 AM

To: Ahrendsen, Blake; Virgil Ellis

Subject: Fwd: MS4 Permit for UCA

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Nbw.en .&view=pt&q=label%3Aprojects-stormwater%20blake&qs=true&searc. . . 11/11



University of Central Arkansas Mail - MS4

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ARKANSAS

Virgil Ellis <vellis@uca.edu>

MS4

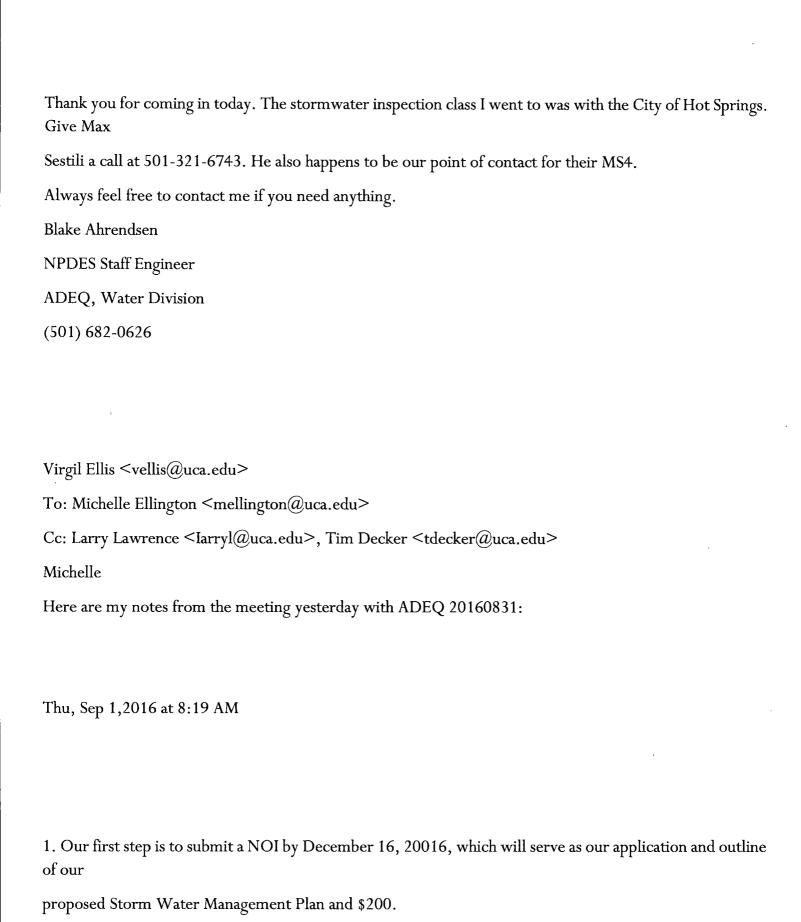
8 messages

Ahrendsen, Blake \leq Ahrendsen@adeq.state.ar.us \geq

To: Michelle Ellington mellington@uca.edu, "vellis@uca.edu" <vellis@uca.edu>

Ed and Michelle,

Wed, Aug 31,2016 at 10:26 AM



2. Based on the wording of the water quality study of Stone Dam Creek, the University of Central Arkansas does not need

to perform water sampling and testing.

3. Our second step is to review the draft SWMP with the SWMC to finalize the plan for submission to ADEQ. Included in

this plan should be a Storm Water Drainage map.

4. Once a permit is issued it will be good until the General Permit to ADEQ from EPA expires, about 2 years. Progress on

implementing the SWMP will be required annually.

5. Once the new General Permit is issued to ADEQ a review of all the MS4 permits will start to modify them as needed to

conform with the new General Permit conditions.

Other Items mentioned during the meeting:

4. We need to confirm that our underground tanks are registered with ADEQ.

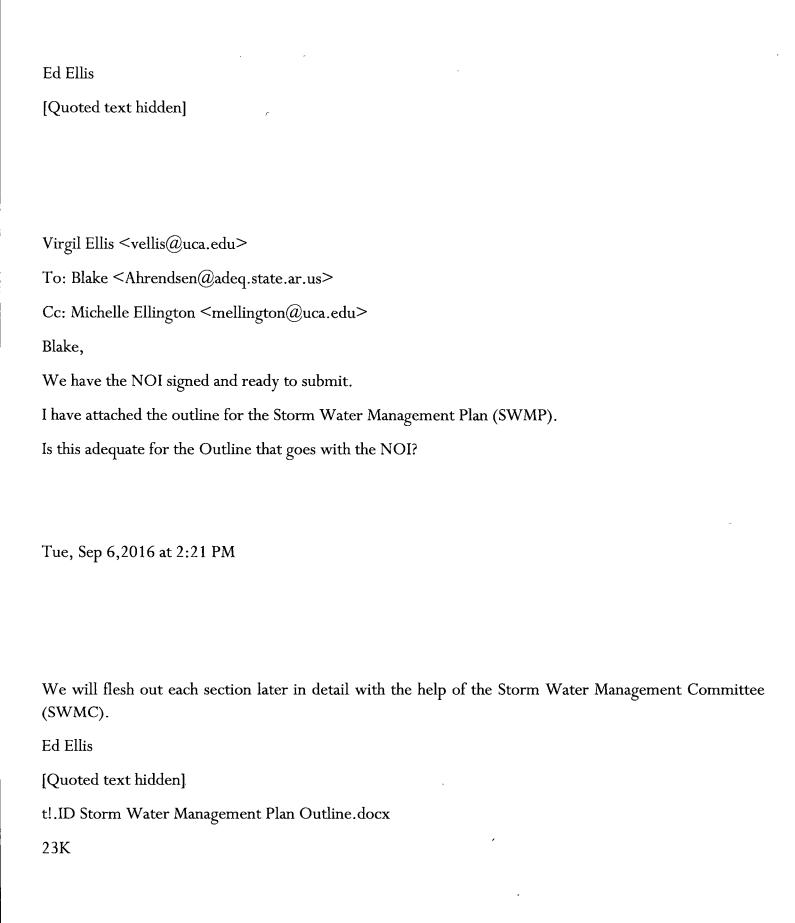
Tim said that our underground fuel storage tanks are registered.

https:llmail.goog Ie .com/mail/u/1I?ui=2&ik=08eb822984&jsver=Suokl_11 Nbw.en .&view=pt&q=label%3Aprojects-stormwater%20blake&qs=true&search. . . 1/3

7/17/2017

University of Central Arkansas Mail - MS4

- 5. We need to confirm that our backup generators are in compliance with air regulations:
- •••. 40 CFR part 63 subpart ZZZZ.... (NSPS) for Stationary Compression Ignition (CI)
- •••. 40 CFR part 60 subpart 1111
- •••. NSPS for Stationary Spark Ignition (SI) ICE •••. 40 CFR part 60 subpart JJJJ



To: Virgil Ellis < vellis@uca.edu>

[Quoted text hidden]

t!.ID Storm Water Management Plan Outline.docx

23K

Fri, Sep 16, 2016 at 8:27 AM

Virgil Ellis <vellis@uca.edu> Mon, Sep 19, 2016 at 9:30 AM

To: Velton Daves <veltond@uca.edu>, Kevin Carter <kacarter@uca.edu>, Tim Decker <tdecker@uca.edu>

Cc: Michelle Ellington <mellington@uca.edu>, Larry Lawrence <larryl@uca.edu>

Velton/Kevin/Tim

As a part of the MS4 Storm Water Permit, UCA will be need to monitor construction site compliance by having a certified

inspector.

Blake Ahrendsen with AEDQ recommended the stormwater certification class provided by the City of Hot Springs.

It is scheduled for October 27.

Ed Ellis

----- Forwarded message -----

From: Ahrendsen, Blake < Ahrendsen@adeq.state.ar.us>

Date: Wed, Aug 31,2016 at 10:26 AM

Subject: MS4

To: Michelle Ellington <mellington@uca.edu>, "vellis@uca.edu" <vellis@uca.edu>

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N

7/17/2017

University of Central Arkansas Mail - MS4

Ahrendsen, Blake < Ahrendsen@adeq.state.ar.us>

To: Virgil Ellis <vellis@uca.edu>

Cc: Michelle Ellington <mellington@uca.edu>

That outline should work, Ed. Sorry I didn't get back to you sooner.

From: Virgil Ellis [mailto:vellis@uca.edu]

Sent: Tuesday, September 061 2016 2:21 PM

To: Ahrendsen, Blake

Cc: Michelle Ellington

Subject: Re: MS4

[Quoted text hidden]

Mon, Sep 19, 2016 at 10:08 AM

Mon, Sep 26,2016 at 9:05 AM

Virgil Ellis <vellis@uca.edu>

To: "Ahrendsen, Blake" < Ahrendsen@adeq.state.ar.us>

Called, but just wanted to let you know we plan to submit the MS4 application next week. Still waiting on the check.

Ed Ellis

[Quoted text hidden]

Ahrendsen, Blake < Ahrendsen@adeq.state.ar.us>

To: Virgil Ellis < vellis@uca.edu>

Thanks for the update, Ed. I'll be in the office the rest of the day, if you still want to talk ..

Blake Ahrendsen

From: Virgil Ellis [mailto:vellis@uca.edu]

Sent: MondaYI September 26, 20169:05 AM

To: Ahrendsen, Blake

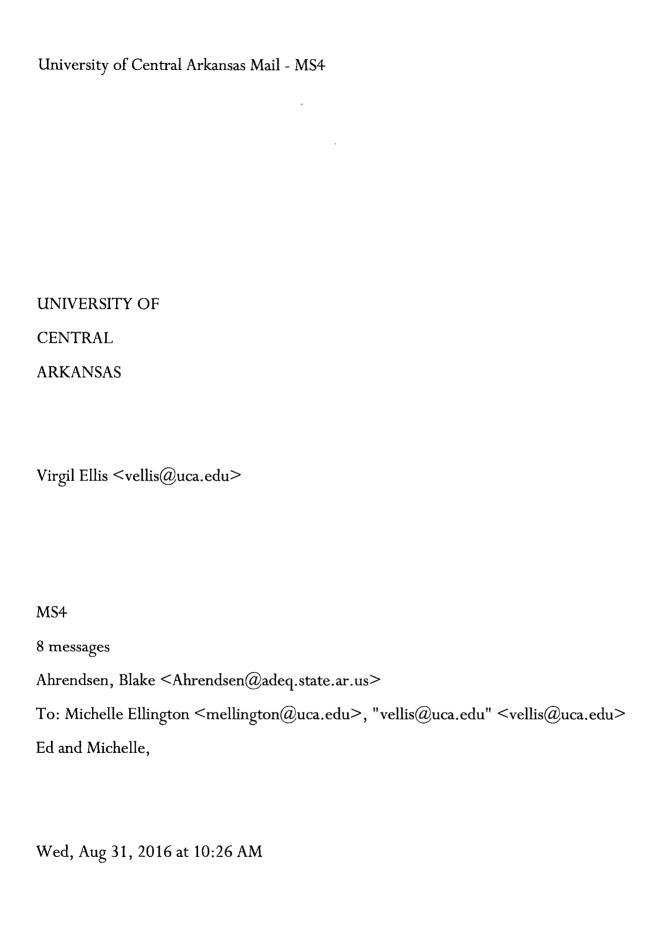
Subject: Re: MS4

[Quoted text hidden]

Mon, Sep 26,2016 at 9:17 AM

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7/17/2017



Thank you for coming in today. The stormwater inspection class I went to was with the City of Hot Springs. Give Max

Sestili a call at 501-321-6743. He also happens to be our point of contact for their MS4.

Always feel free to contact me if you need anything.

Blake Ahrendsen

NPDES Staff Engineer

ADEQ, Water Division

(501) 682-0626

Virgil Ellis < vellis@uca.edu>

To: Michelle Ellington <mellington@uca.edu>

Cc: Larry Lawrence < Iarryl@uca.edu>, Tim Decker < tdecker@uca.edu>

Michelle

Here are my notes from the meeting yesterday with ADEQ 20160831:

Thu, Sep 1,2016 at 8:19 AM

1. Our first step is to submit a NOI by December 16, 20016, which will serve as our application and outline of our

proposed Storm Water Management Plan and \$200.

2. Based on the wording of the water quality study of Stone Dam Creek, the University of Central Arkansas does not need

to perform water sampling and testing.

3. Our second step is to review the draft SWMP with the SWMC to finalize the plan for submission to ADEQ. Included in

this plan should be a Storm Water Drainage map.

4. Once a permit is issued it will be good until the General Permit to ADEQ from EPA expires, about 2 years. Progress on

implementing the SWMP will be required annually.

5. Once the new General Permit is issued to ADEQ a review of all the MS4 permits will start to modify them as needed to

conform with the new General Permit conditions.

Other Items mentioned during the meeting:

4. We need to confirm that our underground tanks are registered with ADEQ.

Tim said that our underground fuel storage tanks are registered.

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7/17/2017

University of Central Arkansas Mail - MS4

- 5. We need to confirm that our backup generators are in compliance with air regulations:
- ~ 40 CFR part 63 subpart ZZZZ ~ (NSPS) for Stationary Compression Ignition (CI)
- ~ 40 CFR part 60 subpart 1111
- •••. NSPS for Stationary Spark Ignition (SI) ICE \sim 40 CFR part 60 subpart JJJJ

Ed Ellis

Virgil Ellis < vellis@uca.edu> To: Blake < Ahrendsen@adeq.state.ar.us > Cc: Michelle Ellington <mellington@uca.edu> Blake, We have the NOI signed and ready to submit. I have attached the outline for the Storm Water Management Plan (SWMP). Is this adequate for the Outline that goes with the NOI? Tue, Sep 6,2016 at 2:21 PM We will flesh out each section later in detail with the help of the Storm Water Management Committee (SWMC). Ed Ellis [Quoted text hidden] ~ Storm Water Management Plan Outline.docx 23K Michelle Ellington < mellington@uca.edu> To: Virgil Ellis < vellis@uca.edu> [Quoted text hidden]

~ Storm Water Management Plan Outline.docx

Fri, Sep 16, 2016 at 8:27 AM

Virgil Ellis <vellis@uca.edu> Mon, Sep 19, 2016 at 9:30 AM

To: Velton Daves <veltond@uca.edu>, Kevin Carter <kacarter@uca.edu>, Tim Decker <tdecker@uca.edu>

Cc: Michelle Ellington mellington@uca.edu, Larry Lawrence Larry Lawrence

Velton/KevinlTim

As a part of the MS4 Storm Water Permit, UCA will be need to monitor construction site compliance by having a certified

inspector.

Blake Ahrendsen with AEDQ recommended the stormwater certification class provided by the City of Hot Springs.

It is scheduled for October 27.

Ed Ellis

----- Forwarded message -----

From: Ahrendsen, Blake < Ahrendsen@adeq.state.ar.us >

Date: Wed, Aug 31,2016 at 10:26 AM

Subject: MS4

To: Michelle Ellington <mellington@uca.edu>, "vellis@uca.edu" <vellis@uca.edu>

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University of Central Arkansas Mail - MS4

Ahrendsen, Blake < Ahrendsen@adeq.state.ar.us>

To: Virgil Ellis < vellis@uca.edu>

Cc: Michelle Ellington < mellington@uca.edu>

That outline should work, Ed. Sorry I didn't get back to you sooner.

From: Virgil Ellis [mailto:vellis@uca.edu]

Sent: Tuesday, September 06,20162:21 PM

To: Ahrendsen, Blake

Cc: Michelle Ellington

Subject: Re: MS4

[Quoted text hidden]

Mon, Sep 19, 2016 at 10:08 AM

Mon, Sep 26,2016 at 9:05 AM

Virgil Ellis < vellis@uca.edu>

To: "Ahrendsen, Blake" < Ahrendsen@adeq.state.ar.us>

Called, but just wanted to let you know we plan to submit the MS4 application next week. Still waiting on the check.

Ed Ellis

[Quoted text hidden]

Ahrendsen, Blake < Ahrendsen@adeq.state.ar.us>

To: Virgil Ellis < vellis@uca.edu>

Thanks for the update, Ed. I'll be in the office the rest of the day, if you still want to talk ..

Blake Ahrendsen

From: Virgil Ellis [mailto:vellis@uca.edu]

Sent: Monday, September 26, 2016 9:05 AM

To: Ahrendsen, Blake

Subject: Re: MS4

[Quoted text hidden]

Man, Sep 26,2016 at 9:17 AM

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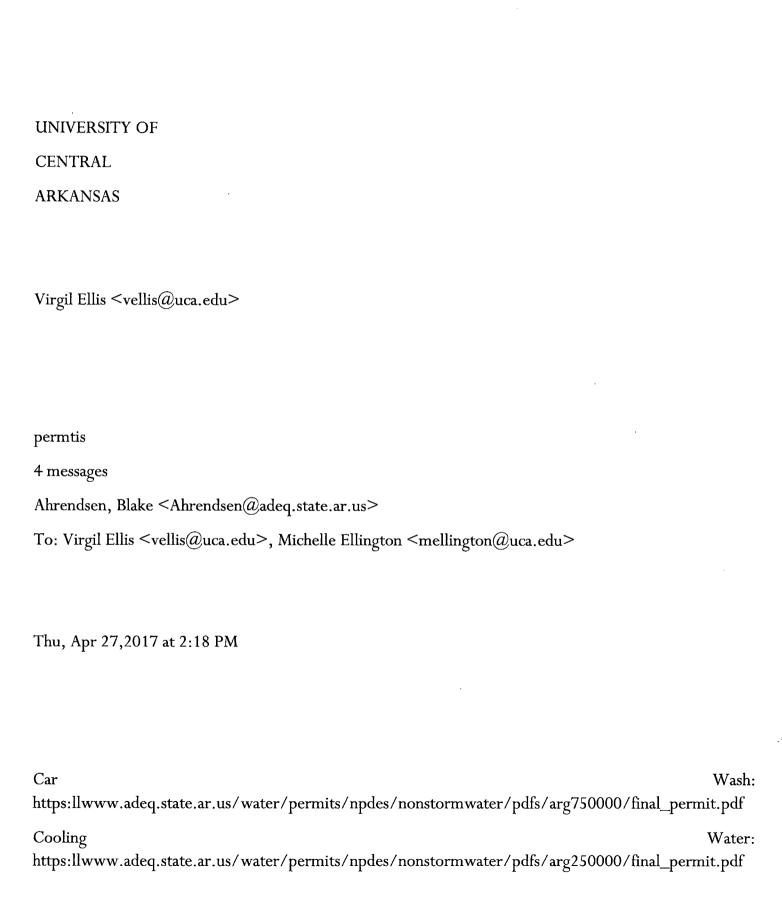
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Nbw.en~. & view = pt&q = label % 3 A projects-stormwater % 20 blake&qs = true& search.~.~.

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7/17/2017

University of Central Arkansas Mail - permtis



Blake Ahrendsen

NPDES Staff Engineer

ADEQ, Water Division

(501) 682-0626

Ahrendsen, Blake < Ahrendsen@adeq.state.ar.us>

To: Virgil Ellis <vellis@uca.edu>, Michelle Ellington <mellington@uca.edu>

Thu, Apr 27,2017 at 2:20 PM

If you have any questions about these permits, I would recommend you contact Alex Kreps at 501-682-0619

From: Ahrendsen, Blake

----~----_--

Sent: Thursday, April 27, 2017 2:18 PM

To: Virgil Ellis; 'Michelle Ellington'

Subject: permtis

[Quoted text hidden]

Michelle Ellington <mellington@uca.edu>

To: "Ahrendsen, Blake" < Ahrendsen@adeq.state.ar.us>

Cc: Virgil Ellis <vellis@uca.edu> Blake,

Man, May 1, 2017 at 1:38 PM

Thank you for forwarding these links to the other permits, we are currently reviewing the requirements and will reach out

to Alex soon. I have attached our SWMP draft for your review, please keep in mind that the implement year and

department responsibility assignment for some BMPs may change. Please let us know what changes you feel may be

necessary.

Ed and I very much appreciate your help with this, we look forward to your comments.

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7/17/2017

Thanks again,

Michelle

Michelle Ellington

University of Central Arkansas

Director of Energy and Sustainability

mellington@uca.edu

501-450-3610

University of Central Arkansas Mail - permtis

 \sim UCA Storm Water Management Plan Draft 050117.docx

13897K

Ahrendsen, Blake < Ahrendsen@adeq.state.ar.us>

To: Michelle Ellington < mellington@uca.edu>

Cc: Virgil Ellis < vellis@uca.edu>

Thu, May 11, 2017 at 12:38 PM

I'd say this was a good start. I have filled out the checklist based on what I saw, but it is possible that I may have

missed something.

It should also be of note that you mentioned that there will be a public hearing. This is not common. There is,

however a 30-day public comment period, where potentially someone would request a public hearing, or make

comments that you would have to address before we issue coverage under the permit.

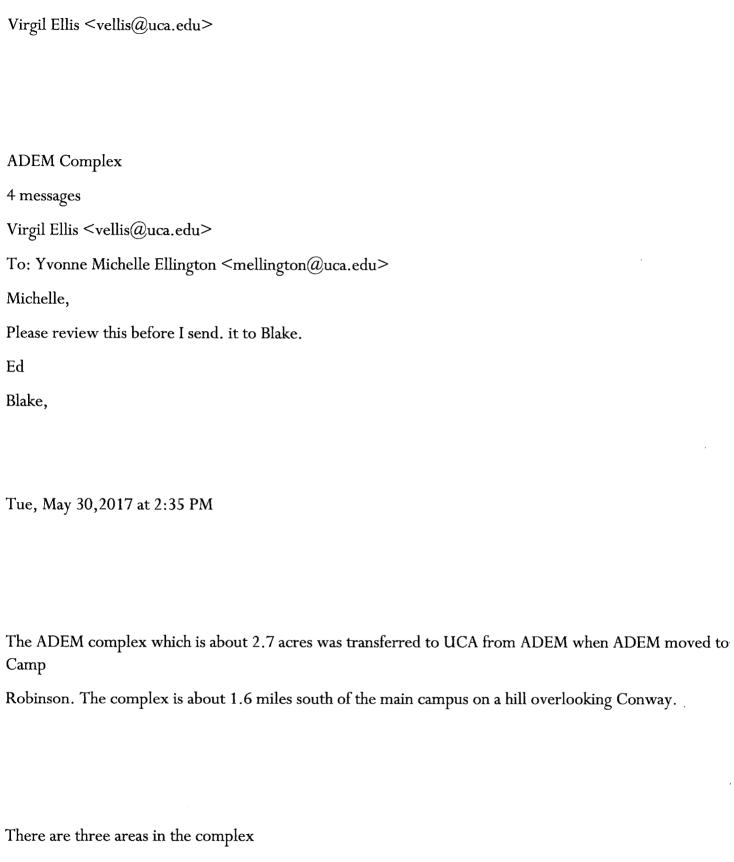
It should also be of note that although it is not covered in the SWMP checklist, Part 3.4.5 ofthe permit is applicable

to you. It will be something to consider in the future.

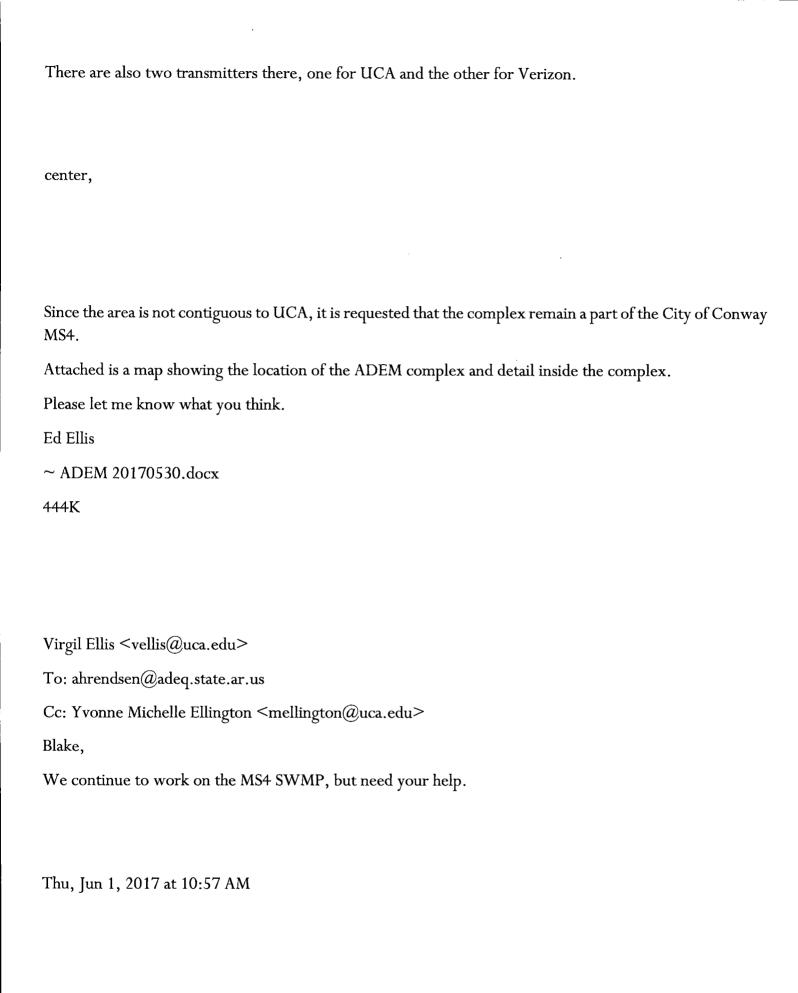
From: Michelle Ellington [mailto:mellington@uca.edu]

Sent: Monday, May 01,2017 1:38 PM

To: Ahrendsen, Blake
Cc: Virgil Ellis
Subject: Re: permtis
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!IID UCA SWMP Review Checklist.doc
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7/17/2017
University of Central Arkansas Mail - ADEM Complex
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ARKANSAS



- 1. An underground office space of 6731 sq ft used by UCA for storage and a backup data
- 2. An above ground fire station of 6842 sq ft manned by the City of Conway and
- 3. An above ground office area of 6010 sq ft for the Faulkner County Major Crimes Unit



The ADEM complex which is about 2.7 acres was transferred to UCA from ADEM when ADEM moved to Camp

Robinson. The complex is about 1.6 miles south of the main campus on a hill overlooking Conway.

Since the area is not contiguous to UCA, it is requested that the complex remain a part of the City of Conway MS4.

There are three areas in the complex

- 1. An underground office space of 6731 sq ft used by UCA for storage and a backup data
- 2. An above ground fire station of 6842 sq ft manned by the City of Conway and
- 3. An above ground office area of 601 0 sq ft for the Faulkner County Major Crimes Unit

There are also two transmitters there, one for UCA and the other for Verizon.

center,

2

1

7/17/2017

University of Central Arkansas Mail - ADEM Complex

Attached is a map showing the location of the ADEM complex and detail inside the complex.

Please let me know if we can omit this area from the plan.

Ed Ellis

~ ADEM 20170530.docx

444K

Ahrendsen, Blake < Ahrendsen@adeq.state.ar.us>

To: Virgil Ellis < vellis@uca.edu>

Cc: Yvonne Michelle Ellington <mellington@uca.edu>

Mon, Jun 5, 2017 at 3:33 PM

Since this area has a lot of entities involved, I would imagine that its best for the City of Conway to continue covering

this area.

From: Virgil Ellis [mailto:vellis@uca.edu]

Sent: Thursday, June 1, 2017 10:58 AM

To: Ahrendsen, Blake

Cc: Yvonne Michelle Ellington

Subject: Fwd: ADEM Complex

[Quoted text hidden]

Yvonne Ellington <mellington@uca.edu>

To: Virgil Ellis < vellis@uca.edu>

Cc: "Ahrendsen, Blake" <ahrendsen@adeq.state.ar.us> Blake,

Fri, Ju17, 2017 at 10:59 AM

I just wanted to let you know that our SWMP is now ready to submit. A new check is being issued today and we will send

the SWMP and check early next week.

Please let me know if you have any questions or concerns.

Have a great weekend.

Michelle

Michelle Ellington

University of Central Arkansas

Director of Energy and Sustainability

mellington@uca.edu

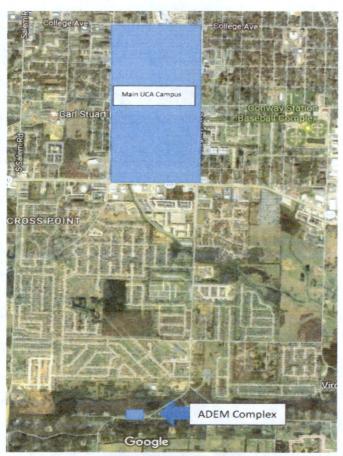
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Appendix F. Stormwater Drainage Basin Map

