Stormwater Management Program

As required per the General Permit PRR0400011 for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4s) in the Commonwealth of Puerto Rico under the Clean Water Act Phase II of the National Pollutants Discharge Elimination System (NPDES).

Prepared exclusively to:

The University of Puerto Rico
Ponce, Campus

By:

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Revision 1

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ACRONYMS

1. SWMP – **S**torm **W**ater **M**anagement **P**rogram.
2. MS4 - **M**unicipal **S**eparate **S**torm **S**ewer **S**ystem.
3. NPDES – **N**ational **P**ollutants **D**ischarge **E**limination **S**ystem.
4. IDDE – **I**llicit **D**ischarge **D**etection and **E**limination.
5. WQS – **W**ater **Q**uality **S**tandard.
6. TMDLs – **T**otal **M**aximum **D**aily **L**oads.
7. WLAs – **W**aste **L**oad **A**llocations.
8. USFWS – **U**nited **S**tates **F**ish and **W**ildlife **S**ervices.
9. SHIPO – **S**tate **H**istoric **P**reservation **O**ffice.
10. NHPL – **N**ational **H**istoric **P**reservation **L**ist.
11. BMP – **B**est **M**anagement **P**ractice.
12. SSO – **S**anitary **S**ewer **O**verflow.
13. SWPPP – **S**torm **W**ater **P**ollution **P**revention **P**lan.
14. MEP – **M**aximum **E**xtent **P**racticable.
15. UAs – **U**rbanized **A**reas
16. MCM – **M**inimum **C**ontrol **M**easures

DEFINITIONS

1. MS4 – requires municipal operators to reduce the discharge of pollutants from their separate storm sewer system to receiving water bodies, protecting their water quality, according with the Clean Water Act.
2. NPDES – Section 101 of the Clean Water Act established the goal of prevent, reduce ad eliminate pollution in the United States water bodies to restore and maintain their chemical, physical and biological integrity. NPDES permits were created to systematically reduce and eliminate pollutants from the United States water bodies**.**
3. 303 d list – short list of a state impaired and threatened water bodies.
4. TMDL – established the maximum amount of a pollutant allowed in a receiving waterbody from a point or a non-point source.
5. Non-point source – pollution resulting from many diffuse and different sources.

1.0 BASIC SWMP INFORMATION

This stormwater management program planning document was developed by UPR-Ponce Campus to describe the activities and measures implemented in urbanized areas to meet the terms and conditions of the General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4s) of the Commonwealth of Puerto Rico (PR) (General Permit).

1.1 STAFF ORGANIZATION

The SWMP management staff is composed of the Chancellor, as the principal responsible officer, the Administration Dean, as higher management positions. The Administration Dean delegates, the operational duties and daily tasks of the SWMP, to the Physical Resources Director and to the Environmental Protection and Health and Safety Officer.

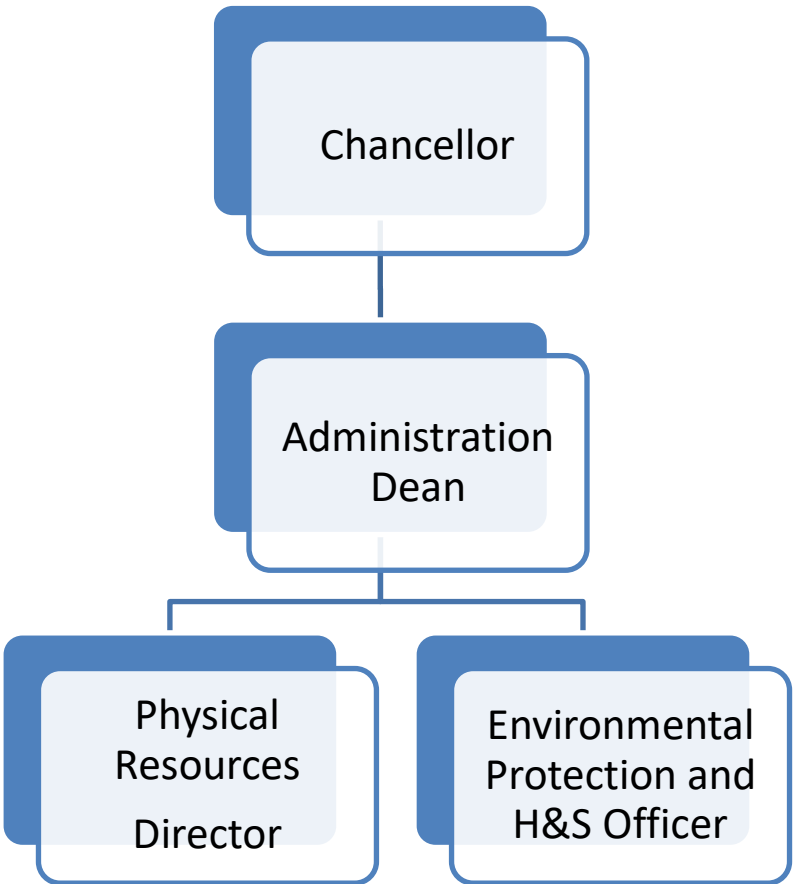


Figure 1 SWMP Staff Organization Chart

1.2 RECEIVING WATERS AND DRINKING WATER SOURCES

The waterbodies identified in Table 1 receive stormwater discharges from UPR-Ponce's MS4.

Table 1 - Receiving Water Data Summary Table

Receiving Waterbody Segments	WQS Classification	Impairment/Pollutant of Concern	TMDLs	Applicable WLAs	No. of Outfalls
Rio Portugués	SD	Fecal Coliform, pH and Turbidity	FC	NA	3
Río Bucaná	SD	Fecal Coliform (FC)	FC	NA	3

UPR-Ponce's MS4 also discharges into a number of interconnected MS4s as identified in Table 2.

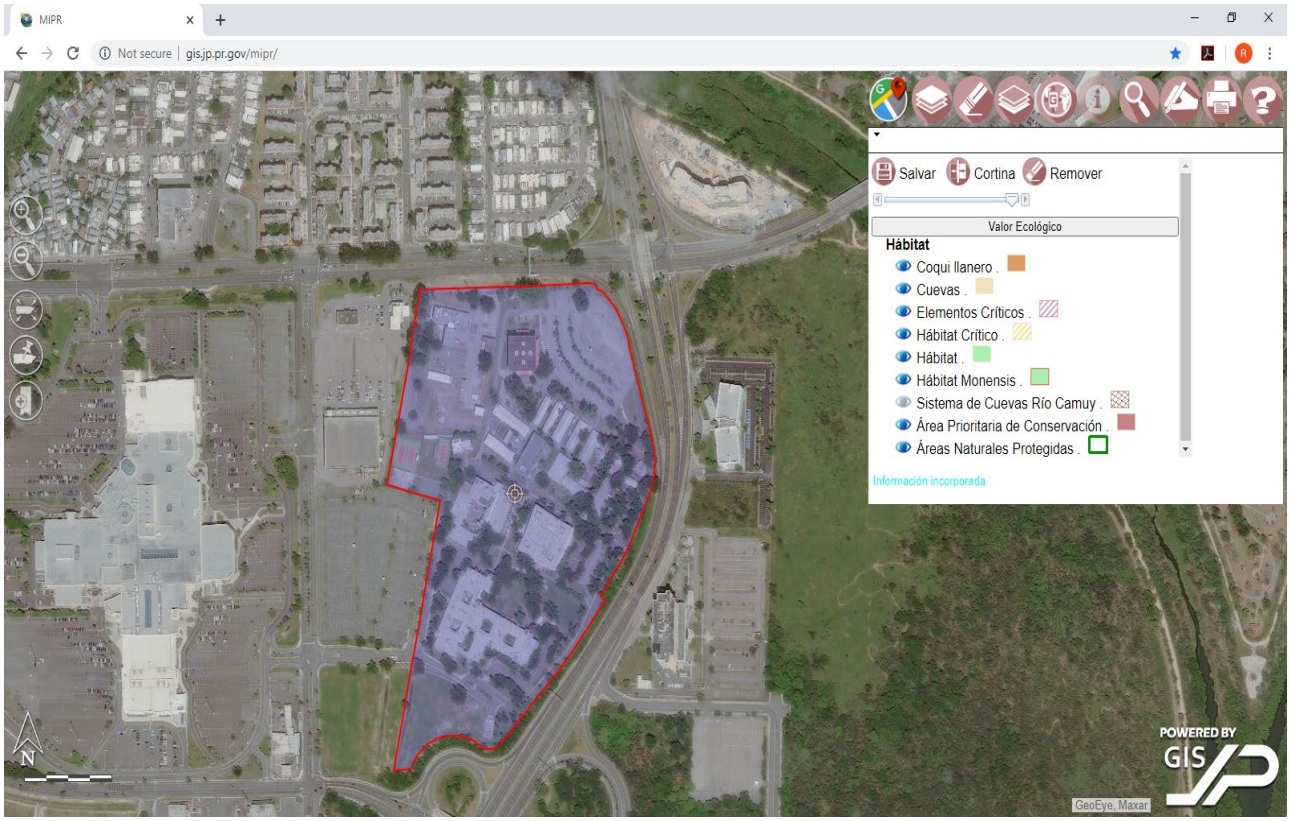
Table 2 - DTOP – PR 14 receiving Water Data Summary Table

Receiving Waterbody Segments	WQS Classification	Impairment/Pollutant of Concern	TMDLs	Applicable WLAs	No. of Inter-connections
DTOP – PR-03	SD	Fecal Coliform (FC), pH and Turbidity	FC	NA	6

No public drinking water sources is impacted by UPR-Ponce's MS4 discharges.

2.0 ENDANGERED AND THREATENED SPECIES AND CRITICAL HABITAT

The MS4 operated by UPR-Ponce evaluated if listed threatened or endangered species and critical habitat are present within the MS4 urbanized area. This MS4 system complies with the Criterion A of the Endangered Species Act – No endangered or threatened species or critical habitat are in proximity to the storm water discharges or discharge related activities. The following Interactive Map of the Puerto Rico Planning Board (IMPRPB) shows that no endangered or threatened species or critical habitat are in the proximity of the UPR-Ponce MS4 System. The IMPRPB receive data from the United States Fish and Wildlife Services (USFWS).



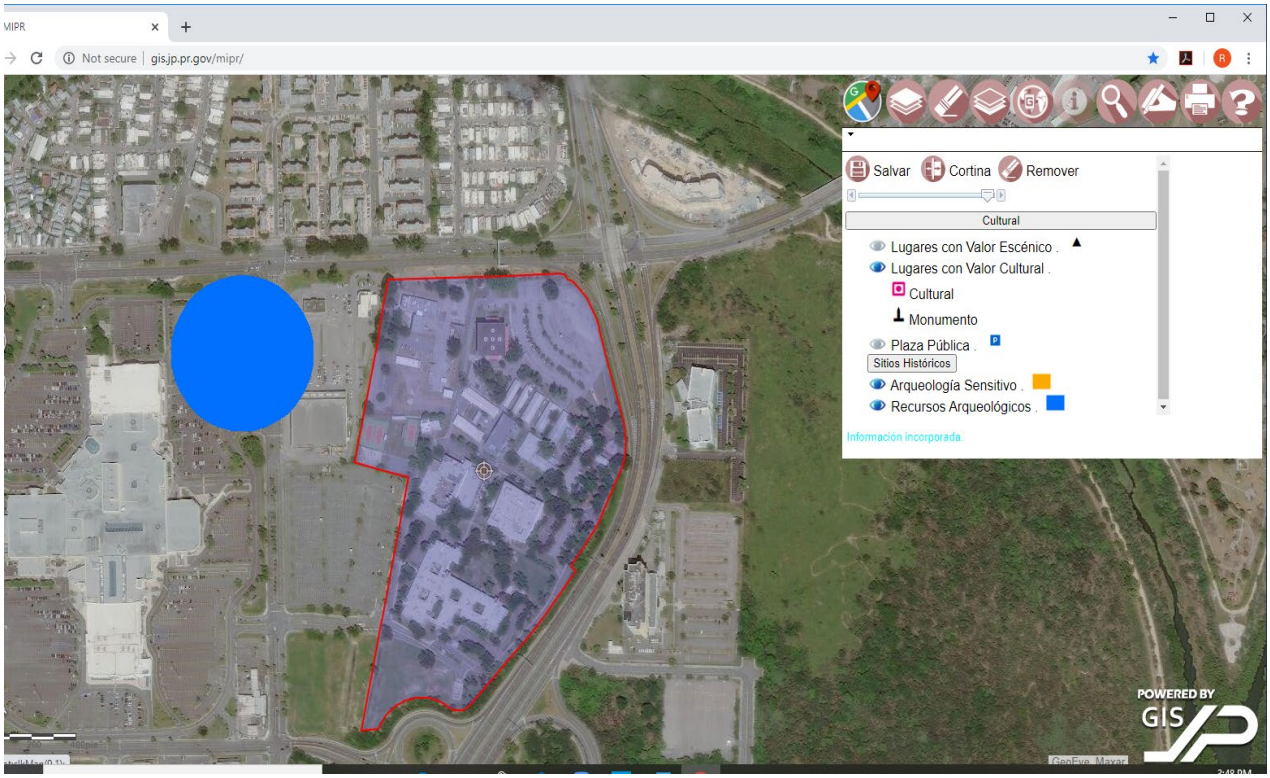
3.0 HISTORIC PROPERTIES

The properties listed in the National Historic Properties List (NHPL) located within the MS4's urbanized are included in Table 3. An evaluation of the information gathered from NHPL, previous earth disturbances, surveys or other activities conducted within the MS4's urbanized area and the best management practices that include construction or installation of any stormwater control measures requiring ground disturbing activities of less than one acre, within the MS4 operated by UPR-Ponce was conducted.

Table 3 UPR-Ponce National Historic Properties List within the MS4 Urbanized Area

National Historic Properties	Location	Stormwater Control Measures (Potential Impact)
Not Listed – Archaeologist Resources	Plaza del Caribe – 412-000-002-14	None

To determine eligibility, UPR-Ponce assessed the potential effects of the MS4 known storm water discharges and discharge related activities on the properties listed in the National Register of Historic Properties List and followed the steps outlined in Appendix D of the General Permit. UPR-Ponce determined that it meets eligibility under Criterion A.



4.0 MAP OF SEPARATE STORM SEWER SYSTEM

As required by the MS4 General Permit, a copy of the revised stormwater drainage system and sewer system maps are included in Attachment I.

5.0 CONTROLS FOR TARGETING POLLUTANTS OF CONCERN

5.1 Controls for existing discharges to impaired waters with TMLS

UPR-Ponce submitted a Notice of Intent (NOI) on September 28, 2016 in which identified the Rio Portugués and Rio Bucaná, as the nearest water bodies, 560 meters west and 550 meters east, from UPR-Ponce premises, respectively. On January 23, 2017 EPA sent a Notice of Coverage under NPDES MS4 to UPR-Ponce (PRR040011).

The Puerto Rico 305 (b) / 303 (d) Integrated Report (November 2016) established TMDLs for impaired waters by the Water Quality Area of the Puerto Rico Environmental Quality Board (PREQB). In this report, PREQB established TMDLs for Fecal Coliform at Rio Portugués and Rio Bucaná. Also, PREQB listed pH and Turbidity as pollutants causing impairment at Rio Portugués.

5.1.1 **Fecal Coliform** - Targeted Controls & Associated Measurable Goals

Control Measure:	Identify and inspect periodically the facility sewer manholes at the campus and showing the location of each one in the map.
Measurable Goal:	Identify and detect any sewer overflow and correct the overflow, as soon as possible.
Person(s) Responsible:	Physical Resources Director

Control Measure:	Sewer Drainage Cleanup and Unplugging.
Measurable Goal:	Avoid sewer system overflows
Person(s) Responsible:	Physical Resources Director

6.0 LEGAL AUTHORITY AND ENFORCEMENT

Control Measure	**BMP LA1 – Adequate Legal Authority**
	According with the Puerto Rico Environmental and Natural Resources Department (PRENRD) regulations all construction activities shall comply with erosion and sedimentation controls to avoid stormwater runoff contamination. Also, the Puerto Rico Water Quality Standard Regulation established limits regarding fecal coliform and enterococci parameters according with the receiving water body designation.
Measurable Goal:	UPR-Ponce established erosion and sedimentation controls for construction activities according with PRENRD regulation and implemented a maintenance program in the stormwater drainage system to avoid sewer overflows. Turbidity measures and fecal coliforms sampling and analyses will be performed during construction activities to validate the control measures effectiveness.
Person (s) Responsible:	Environmental Protection and Health and Safety Officer.

Control Measure	**BMP LA2 – Enforcement SOP – Upstream Investigation**
Measurable Goal:	Every exceedance detected regarding stormwater contamination will be followed by an upstream investigation and additional sampling and analysis for the concern parameter. A report of such investigation that includes cause and recommended corrective actions will be send to PRENRD.
Person (s) Responsible:	Environmental Protection and Health and Safety Officer.

7.0 CONTROLS TO REDUCE POLLUTANTS TO THE MAXIMUM EXTENT PRACTICABLE - MEP

The following sections describe UPR-Ponce program to reduce pollutants from the discharge of pollutants from the MS4 to the maximum extent practicable. As necessary, the sections describe partnerships that UPR-Ponce engaged with the Puerto Rico Department of Public Works and Puerto Rico Environmental and Natural Resources Department (PRENRD) to implement various BMPs, as allowed in Part 2.4.1.b. of the General Permit.

7.1 PUBLIC EDUCATION AND OUTREACH

Control Measure	**BMP PE1 – Employee IDDE Detection & Response Training**
Measurable Goal:	Employee training regarding the proper identification of illicit discharges to the stormwater drainage system with the proper written notification. Also, the proper training response procedure for any illicit discharge to the stormwater drainage system, once identified.
Person (s) Responsible:	Environmental Protection and Health and Safety Officer.
Control Measure	**BMP PE2 –** Promote a public education program encouraging the students' organizations to promote stormwater pollution control activities.
Measurable Goal:	Identifying the impacts of illicit discharges into the storm water drainage system and water bodies and the necessary steps that can be taken to minimize storm water pollution to MEP.
Person(s) Responsible:	Environmental Protection and Health and Safety Officer.
Control Measure	**BMP PE3 –** interact, comply and ensure consistency with applicable State, and local public program requirements
Measurable Goal:	in coordination with PRENRD prepare and distribute printed materials regarding non-source pollution measures to avoid stormwater contamination.
Person(s) Responsible:	Environmental Protection and Health and Safety Officer

7.2 PUBLIC INVOLVEMENT

Control Measure	**BMP PI1 – Storm Drain Labeling Program**
Measurable Goal:	UPR-Ponce has identified that most residents do not understand that stormwater is collected and transported through the stormwater sewer system and directly discharged to surface waters without any treatment. UPR-Ponce will develop and implement a volunteer storm drain labeling program to create awareness. The Infrastructure Department will coordinate with the Department of Public Works and environmental community groups to affix a meta storm drain marker near key storm drain inlets educating people that the untreated water discharges directly to surface waters (e.g., No Dumping, Drains to the River) This BMP will be implemented in three phases; Phase I—Development of Art for the Storm Drain Markers to be completed by December 2020. Phase II—Development of the Storm Drain Labeling Program to be completed by June 2021. Phase III—Implementing the Storm Drain Labeling Program to start December 2020 and be completed by June 2021. Each year, storm drains in one of the three urban areas will be labeled
Person(s) Responsible:	The Physical Resources Department of UPR-Ponce, in collaboration with the Department of Public Works will be responsible to implement this control measure.

Control Measure	**BMP PI2 – Citizens participation involvement**
Measurable Goal:	Create opportunities for citizens to participate in the implementation of control measures such as stream clean-ups and volunteer monitoring; and programs such as Adopt-A-Stream and Adopt-A-Road.
Person(s) Responsible:	Administration Dean

7.3 ILLICIT DISCHARGE DETECTION AND ELIMINATION

7.3.1 Overall IDDE Program

Control Measure	**BMP IDDE1 – Statement of Program Responsibilities**
Measurable Goal:	UPR-Ponce commitment is to identify any illicit discharge into the stormwater drainage system following by the proper notification, response and control measure follow up.
Person(s) Responsible:	Administration Dean

Control Measure	**BMP IDDE2 – Catchment Prioritization**
Measurable Goal:	UPR-Ponce will perform an assessment of the stormwater catchment nearby potential contamination sources and prioritized the pollution control measures according with the assessment. The assessment report will be included in the IDDEP.
Person(s) Responsible	Physical Resources Director

Control Measure	**BMP IDDE3 – Outfall Screening and Sampling**
Measurable Goal:	UPR-Ponce will develop screening and sampling procedures that clearly describe how the facility will conduct outfall screening, including thresholds that trigger an action when a sample exceeds a certain value. The screening and sampling procedures will be developed within one year. During the first six (6) months, UPR-Ponce will screen all outfalls during dry weather.
Person(s) Responsible:	Environmental Protection and Health and Safety Officer

Control Measure	**BMP IDDE4 – Outfall Screening and Sampling**
Measurable Goal:	UPR-Ponce will comply with the dry and wet weather sampling for all outfalls and, based on the results evaluation, established a strategy for upstream control pollution measures
Person(s) Responsible:	Environmental Protection and Health and Safety Officer
Control Measure	**BMP IDDE5 – Follow Up Cleaning Screening Procedure**
Measurable Goal:	Every ten (10) months a screening evaluation of the stormwater drainage system will be performed and action plan will be developed to clean catchment and drainage pipeline that needs to be clean.
Person(s) Responsible:	Physical Resources Director
Control Measure	**BMP IDDE6 – Permittee Spill Response Procedures**
Measurable Goal:	UPR-Ponce will acquire spill kits to be placed strategically around the campus with the proper first response cleaning equipment for immediate spill response. Also, a spill response contractor will be contacted to formalized an operational agreement for a mayor spill response cleaning, as required.
Person(s) Responsible:	Environmental Protection and Health and Safety Officer
Control Measure	**BMP IDDE7 – Secondary Containment – Emergency Generators.**
Measurable Goal:	UPR-Ponce will provide secondary containment for fuel loading and unloading areas for emergency diesel generators.
Person(s) Responsible:	Administration Dean

7.3.2 Sanitary Sewer Overflow

UPR-Ponce will notify the Puerto Rico Aqueduct and Sewer Authority (PRASA) of any sanitary sewer overflow, inside the campus premises. The immediate oral notification (within 24 hours) to PRASA will be at 787-620-2482 (Ponce Regional Office) and to the Environmental Protection Agency Office – Caribbean Office (EPA-CO) at 787-977-5865. A written report will be prepared and sent to PRASA and EPA-CO within five (5) working days. Attachment II includes the SSO Management Information Flowchart.

UPR-Ponce identified all known locations of sanitary sewer manholes and will tag them properly. The tag identification of every manhole will be indicated in the storm sewer map.

Table 5 provide the required information in narrative to be filled in case of any sanitary sewer overflow.

7.3.3 Stormwater Drainage System and Sewer System Maps

UPR-Ponce will develop a storm drainage system map and a sewer system map with the following elements integrated: outfall and receiving waters, pipes, open channel conveyances, catch basins, manholes, and interconnections, catchment delineations and waterbodies identified by name and indication of all impairments s identified in the Puerto Rico's most current 303 (b) list.

Control Measure	**BMP IDDE1 – Develop/Revise Stormwater Drainage Map and Sewer System Map** UPR-Ponce storm sewer system map integrated a total of fifty (50) catchments and manholes with two (2) outfalls.
Measurable Goal:	The revised storm sewer map was finish in August 2020 and integrated in the SWMP and IDDEP.
Person(s) Responsible:	Physical Resources Director

7.3.4 Outfall Inventory

UPR-Ponce developed an outfall and interconnection inventory identifying the two (2) outfall and interconnection points from the MS4, including records of each location and outfall condition. This initial inventory served as a framework for future annual inventory reports. The inventory included a unique identifier, receiving water, date of the most recent inspection, dimensions, shape, material, coordinates, physical conditions and indicators of potential non-stormwater discharges.

Control Measure	**BMP IDDE2 – Develop an Outfall Inventory**
Measurable Goal:	An updated inventory shall be performed annually
Person(s) Responsible	Environmental Protection and Health and Safety Officer

Table 5 Sanitary Sewer Overflow (SSO) Inventory

SSO Date	SSO Duration (Start time – End Time)	Location (Coordinates)	Enter Surface Water/MS4?	Estimated Vol. (gal)	Description of Causes	Corrective Measures Completed with Dates	Corrective Measures Planned with Dates

7.3.5 Employee Training

UPR-Ponce developed an annual training program for employees that included the general requirements of the IDDE Program, its review with the site inspection update. The training emphasized in how to recognize illicit discharges and sanitary sewer overflows with the notification and enforcement procedure. Also, the training reinforced good housekeeping practices and pollution prevention best management practices applicable to the stormwater runoff.

7.3.6 IDDE Program Indicators

UPR-Ponce established indicators to measure the success of the IDDE Program. Such indicators include the identification and quantification of the illicit discharges and the effectiveness of their corrective measures. Another indicator is the identification and occurrence of sanitary overflows and the percentage of the affected area related with the overall campus area. Finally, a quantification of sewage and sediments will be performed when a cleaning of the stormwater drainage system occurred. This measurement will be corelated with the analytical sample results and IDDE Program effectiveness.

7.4 CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

7.4.1 Overall Construction Site Stormwater Management Program

UPR-Ponce adopted the site runoff control program best management practices (BMPs) from the Puerto Rico Environmental and Natural Resources Department (PRENRD). This specific BMPs included erosion and sedimentation control measures, as installation of silt fences, hay bays and catch basin filters during construction activities.

For construction activities that covers more than one (1) acre, UPR-Ponce will submit, to the United Sates Environmental protection Agency, a Notice of Intent (NOI) for a Stormwater General Permit (SWGP). Under a SWGP, a Stormwater Pollution Prevention Plan will be implemented to control the stormwater pollution of construction activities.

For construction activities that covers less that one (1) acre, UPR-Ponce will implement the Erosion and Sediment Control measures established by the PRENRD with the corresponding routine inspections during the period of the construction activities.

All construction contractors and subcontractors will be instructed during a compulsory training and before the beginning of the construction project, about the required erosion and sediment control measures. These measures will be integrated in all the construction project contracts and will be subject to penalties, in the case that the contractor or subcontractor did not comply with them.

Control Measure	**BMP CONS1 – Erosion and Sediment Control BMP Standards**
Measurable Goal:	Establishment of erosion and sediment control measures and its effectiveness in sediment accumulation in the stormwater drainage system.
Person(s) Responsible:	Physical Resources Director.
Control Measure	**BMP CONS2 – Pollution Prevention BMP Standards**
Measurable Goal:	Measurement of turbidity and conductivity during stormwater events at construction activities.
Person(s) Responsible:	Environmental Protection and Health and Safety Officer
Control Measure	**BMP CONS3 – Pre-Construction Review Procedures**
Measurable Goal:	Training of construction contractors' employees with a feedback section of all the BMPs regarding erosion and sediment control.
Person(s) Responsible:	Environmental Protection and Health and Safety Officer
Control Measure	**BMP CONS4 – Inspection and Enforcement Procedures**
Measurable Goal:	Inspection reports findings during construction activities, regarding erosion and sediments control measures, and contract enforcement actions, if are necessary.
Person(s) Responsible:	Physical Resources Director

7.4.2 Construction Activities Employee Training

All contractors, subcontractors and employees involved in construction activities will be instructed about the required erosion and sediment control measures during a compulsory training, before the beginning of any construction activity. These measures effectiveness will be evaluated during the duration of the construction activity through routine inspections and enforcement actions shall be apply, if are necessary.

7.4.3 Construction Site Inventory

UPR-Ponce will maintain an inventory of all permitted active construction sites, if the construction site area is equivalent to one (1) acre or more, a copy of a Notice of Intent (NOI) and SWPPP will be available. If the construction area is less than one (1) acre, UPR-Ponce will maintain the measure evidence and will be integrated in the inventory available to the permitting authority.

Control Measure	**BMP CONS5 – Develop a Construction Site Inventory and Aggregate Storage**
Measurable Goal:	Maintain an updated inventory of construction activities at UPR-Ponce campus with the area estimation (acre) measurement for each activity. Maintain aggregate construction materials in a roofed storage area.
Person(s) or Department Responsible:	Physical Resources Director

7.5 STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

The action of developing a site, can result in replacing existing permeable areas with impervious surfaces, such as buildings, parking lots, and sidewalks. Increasing impervious surfaces have the effect of increasing stormwater runoff and consequently can increase the potential of carrying pollutants into surface waters if no compensation or mitigation measures are implemented. *Green Infrastructure* is an approach to water management that protects, restores, and mimics the natural water cycle and includes techniques that can be implemented to mitigate or compensate for increased impervious surfaces. Green Infrastructure techniques include increasing infiltration with onsite measures, such as vegetated swales, increasing landscape to paved area ratios, stormwater planter boxes, vegetated curb extensions, and using pervious surfaces for parking lots and walkways.

Control Measure	**BMP POST1 – Stormwater Control Standards – Green infrastructure techniques**
Measurable Goal:	Implementation of stormwater buffer techniques like vegetated swales, stormwater planter boxes and vegetated curb extensions and its effectiveness reducing stormwater runoff.
Person(s) Responsible:	Physical Resources Director

Control Measure	**BMP POST2 – Long-Term Maintenance of Post-Construction Controls**
Measurable Goal:	Landscape maintenance and routine inspections of green infrastructure techniques to maintain its effectiveness.
Person(s) Responsible:	Physical Resources Director

7.6 POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

UPR-Ponce will develop an operation and maintenance program which objective is reducing pollutant runoff to MEP from campus activities and areas (park and open space maintenance).

7.6.1 Operations and Maintenance Programs

Control Measure	**BMP PP1 – Proper use, storage and disposal of pesticides, herbicides and fertilizers**
Measurable Goal:	Reduce the use of pesticides, herbicides and fertilizers and their correlation with outfall analytical results (Ex. Nitrates).
Person(s) Responsible:	Environmental Protection and Health and Safety Officer

Control Measure	**BMP PP2 – Spill Prevention Plans**
Measurable Goal:	Implement spill prevention measures to avoid oil and chemical substances spills that could pollute stormwater.
Person(s) Responsible:	Environmental Protection and Health and Safety Officer

Control Measure	**BMP PP3 – Sweeping open areas (parking lots)**
Measurable Goal:	Six months interval of open areas sweeping, if necessary, including parking lots areas to reduce the stormwater drainage system sediment accumulation to MEP.
Person(s) Responsible:	Physical Resources Director

Control Measure	**BMP PP4 – Storage of Vehicles and Equipment**
Measurable Goal:	Avoid environmental exposure of vehicles and equipment including the prohibition of vehicles and equipment wash, that could reach the stormwater drainage system. UPR-Ponce will construct a roofed area for the vehicles and equipment storage.
Person(s) Responsible:	Physical Resources Director

Control Measure	**BMP PP5 – Catch Basins clean-up**
Measurable Goal:	Annual cleaning schedule implementation of catch basins with correlation results with turbidity samples at the outfalls.
Person(s) Responsible:	Physical Resources Director

7.6.2 Stormwater Pollution Prevention Plans

UPR-Ponce developed a Stormwater Pollution Prevention Plant (SWPPP) for the entire campus where a not covered under a roof pollutant, is exposed to stormwater. The SWPPP contain the following required elements; Pollution Prevention Team Identification, Description of the Facility, Identification of Stormwater Controls, SWPPP Best Management Practices and site inspections.

Control Measure	**BMP PP6 – SWPPP Implementation**
Measurable Goal:	SWPPP effectiveness will be measured against the annual monitoring analytical results of the outfalls.
Person(s) Responsible:	Environmental Protection and Health and Safety Officer

8.0 PROGRAM EVALUATION

8.1 ANNUAL COMPLIANCE EVALUATION

UPR-Ponce will perform self-evaluations annually using EPA's checklist model. Enclosed is the Annual Compliance Evaluation (Attachment III)

8.2 BMP MODIFICATION

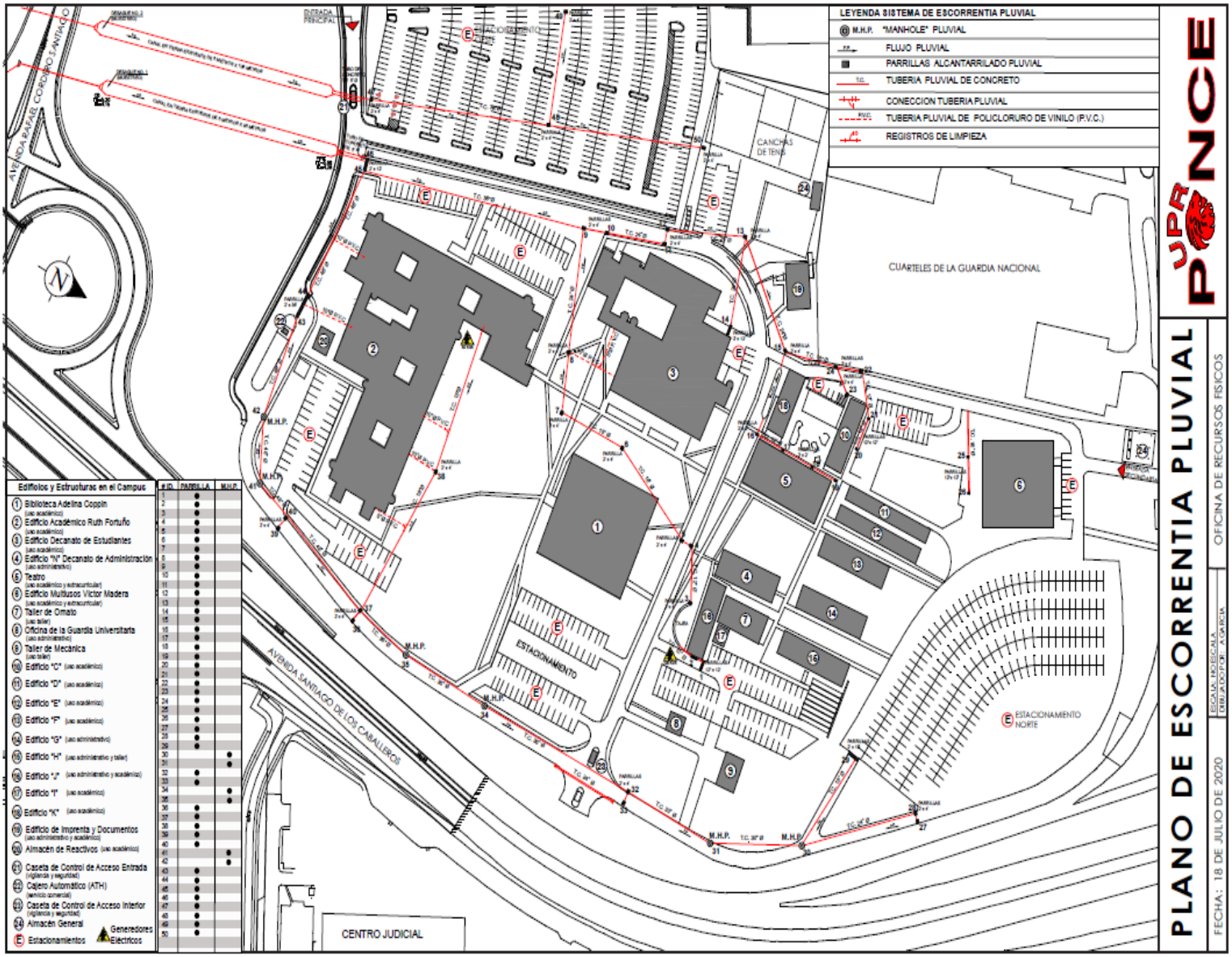
UPR-Ponce will evaluate the appropriateness of the selected BMPs in achieving the objectives of each control measure and the defined measurable goals. UPR-Ponce may change BMPs in accordance with EPA Region 2 Small MS4 General permit provisions.

9.0 CERTIFICATION

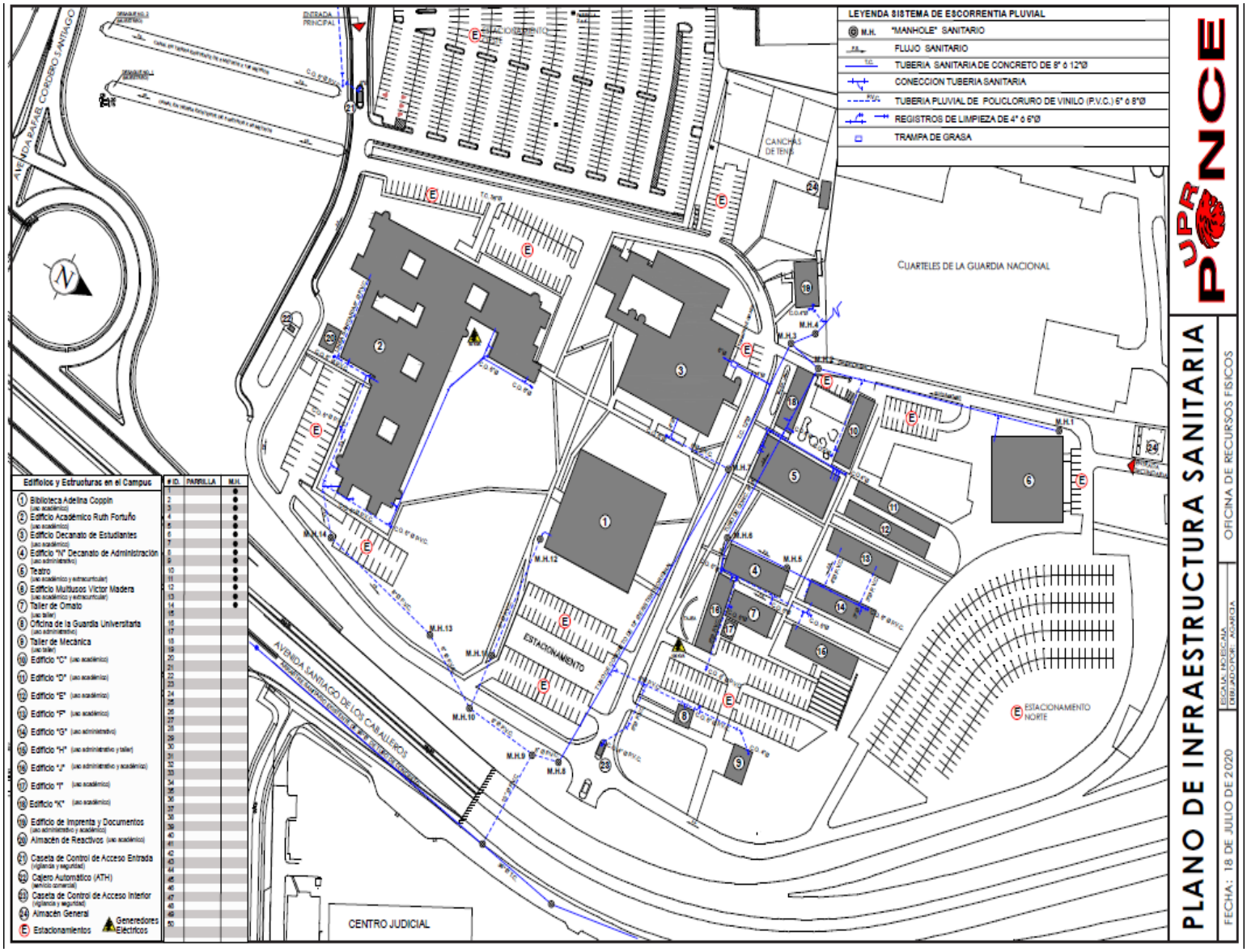
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, to the best of my knowledge and belief, the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Tessie H. Cruz-Rivera
Chancellor

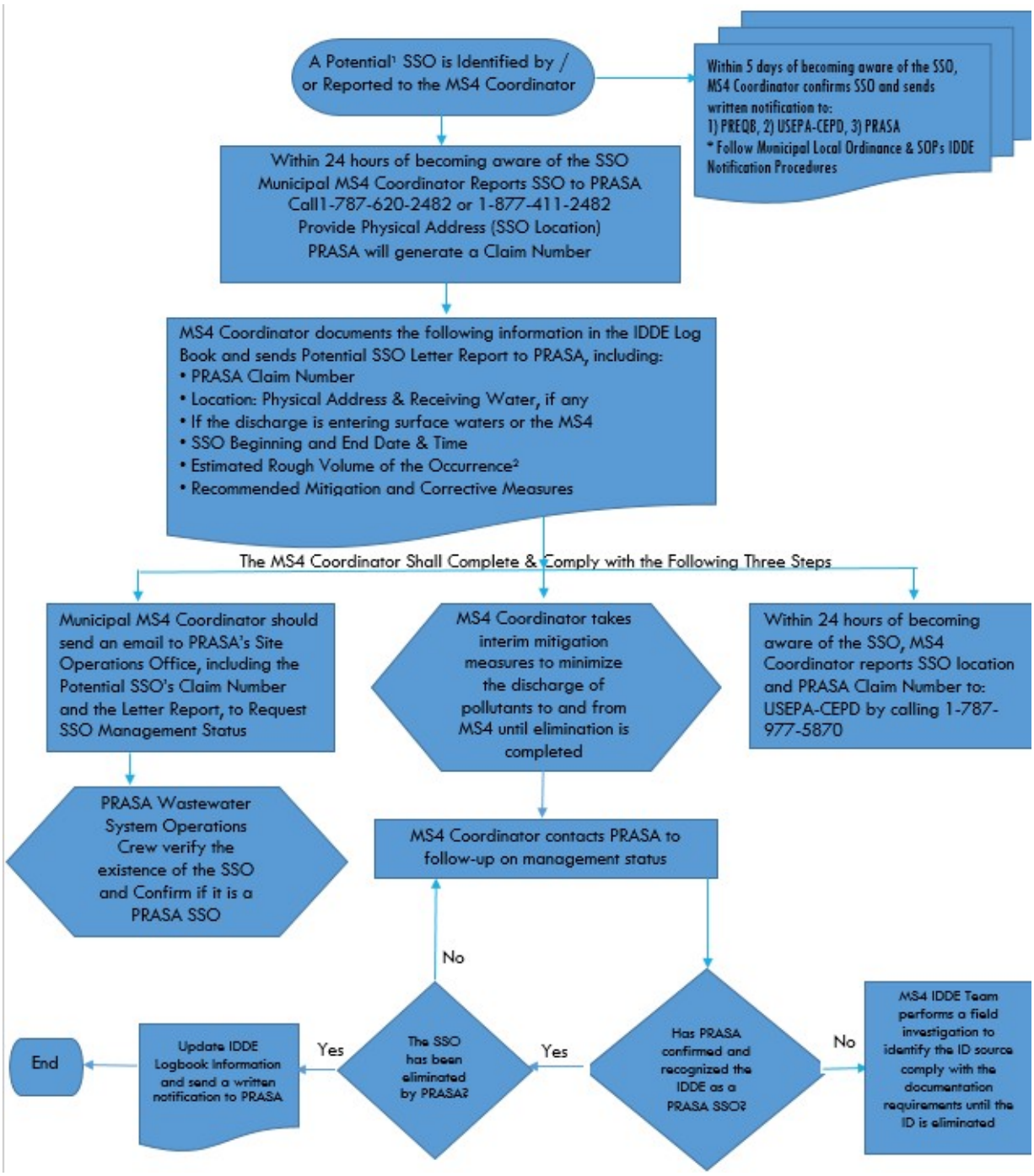
Stormwater Drainage System Map



Sewer System Map



ATTACHMENT II **SSO MANAGEMENT INFORMATION FLOWCHART**



ATTACHMENT III – ANNUAL COMPLIANCE EVALUATION

1.0 Self-Assessment

General overview of the internal Department coordination, meetings, training, staffing changes and new plan or document modifications used to comply with the permit.

2.0 BMP Selection Assessment

General description of the process for selecting and implementing BMPs (i.e., ongoing activities, collaborative efforts, new programs, staff and equipment resources).

3.0 BMPs for Meeting Discharge Requirements to Impaired Waters

A description of any BMPs implemented to comply with impaired water bodies

4.0 Illicit Discharge Detection and Elimination (IDDE)

- *IDDE Mapping (status of completing Phase II mapping requirements)*
- *Outfall Ranking (summary of the problem, high, low and excluded outfalls)*
- *Status of IDDE Program Responsibilities and Systematic Procedures*
- *Outfall Screening and Monitoring Results*
- *Illicit Discharges Detected and Removed*
- *Employee Training*

5.0 Construction Site Stormwater Runoff Control

Post-Construction Stormwater Management for New Development and Redevelopment

- *Policy Updates / Checklist*

6.0 Operations and Maintenance (O&M) Program

- *Facility and Equipment Inventory List Updates*
- *Facility Maintenance Activities*

7.0 Stormwater Pollution Prevention Plans

- *Completion Status*
- *Site Inspection Status Activities Planned for Next Reporting Year Changes to BMPs and/or Measurable Goals*