

Municipal Separate Storm Sewer System (MS4)

Stormwater Management Program

April 30, 2020

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**1 Background**

Through the requirements of the Public Law 92-500, the Clean Water Act (CWA), the U.S. Environmental Protection Agency (EPA) is required to protect the water quality for natural waters throughout the country. Working to reduce or eliminate the pollutants from the waters of the U.S., the EPA established the program known as the National Pollutant Discharge Elimination System (NPDES) to identify water pollution sources.

The EPA has delegated responsibility for the NPDES program in Texas to the Texas Commission on Environmental Quality (TCEQ). In addition to issuing discharge permits to traditional point sources, such as wastewater treatment plants, TCEQ is also responsible for minimizing pollution from non-point sources, such as stormwater runoff from construction sites, industrial facilities and municipal stormsewer systems.

The TCEQ has issued requirements for minimizing stormwater pollution from construction sites and industrial facilities through the issuance of general permits. Sites and facilities comply with these requirements by developing and implementing site-specific stormwater pollution prevention plans (SWPPP).

To protect storm water quality from pollution entering municipal separate stormsewer systems (MS4s) in highly populated areas, TCEQ has developed a general permit with specific conditions that apply to MS4s.

**1.1 Purpose and Scope**

The EPA issued its most recent regulations concerning stormwater management in the Final Municipal Separate Storm Sewer System (MS4) General Permit Remand Rule of November 17, 2016. The EPA originally issued regulations in 1999 intended to protect stormwater quality in small cities and urbanized areas. EPA delegated responsibility for implementing the regulations in Texas, commonly called the Phase II Stormwater Program, to the TCEQ. The regulations apply based on population served within the urbanized area. The University of Houston – Clear Lake falls under the regulations as a Level 2 Non-Traditional MS4 which specifically covers universities.

The EPA required the TCEQ to develop storm water quality permit conditions for regulated public entities that maintain municipal separate storm sewer systems (MS4). The new General Permit issued on January 24, 2019 applies to all cities and urbanized areas based on populations recorded in the 2010 Census. The University of Houston – Clear Lake is one of several entities that are now required to develop a program to protect stormwater quality under TPDES General Permit No. TXR040000 due to our stormwater draining into an impaired water body. Our stormwater drains into Horsepen Bayou, which has a total maximum daily load (TMDL) for bacteria. The University of Houston – Clear Lake has developed a stormwater management program (SWMP) that includes a list of Best Management Practices (BMP’s) that will be implemented by the university in order to achieve the regulatory standard of reducing pollutants in the university’s stormwater to the “maximum extent practicable.” Requirements for the reduction of TMDLs for bacteria have been integrated into the BMPs. Existing University of Houston – Clear Lake stormwater programs and activities designed to protect the university’s water quality will be supplemented with new BMP activities. Measurable goals and an implementation schedule were developed for each of the BMP’s in the SWMP. The BMP’s, measurable goals, implementation schedule, and final SWMP were selected based upon a general assessment of BMP effectiveness, applicability in the University of Houston – Clear Lake environment. Effectiveness of the selected BMP’s, and success in achieving the selected measurable goals will be reviewed annually.

**1.2 University of Houston – Clear Lake**

The University of Houston – Clear Lake is located in Harris county in the south-eastern corner of the Houston UA. According to the results of the 2010 Census, the university is designated as being located within an urbanized area (UA) and is, therefore, eligible for coverage under TPDES general permit TXR040000 for Phase II (small) Municipal Separate Stormsewer Systems (MS4s). This SWMP covers the Clear Lake campus located at 2700 Bay Area Blvd., Houston, TX 77058.

The university is located in the Gulf Coast Prairies and Marshes ecological region. This region is a nearly level, slowly drained plain less than 150 feet in elevation, dissected by streams and rivers flowing into the Gulf of Mexico. The region includes barrier islands along the coast, salt grass marshes surrounding bays and estuaries, remnant tallgrass prairies, oak parklands and oak mottes scattered along the coast, and tall woodlands in the river bottomlands. Average annual rainfall varies from 30 to 50 inches per year distributed fairly uniformly throughout the year. The growing season is usually more than 300 days, with high humidity and warm temperatures. Soils are acidic sands and sandy loams, with clays occurring primarily in the river bottoms. Native vegetation consists of tallgrass prairies and live oak woodlands. Brush species such as mesquite and acacias are more common now than in the past. Although much of the native habitat has been lost to agriculture and urbanization, the region still provides important habitat for migratory birds and spawning areas for fish and shrimp. Horsepen Bayou, which bisects the campus, flows into Armand Bayou, flows into the Armand Bayou Nature Reserve.

The University of Houston – Clear Lake is a four-year state university and one of four distinct institutions in the University of Houston System. Its main campus spans 524 acres in the cities of Pasadena and Houston, Texas, with branch campuses in Pearland and Texas Medical Center. Founded in 1971, UHCL has an enrollment of nearly 9,000 students for fall 2018. The University of Houston–Clear Lake (UHCL) is one of four separate and distinct institutions in the University of Houston System. The institution is separately accredited, offers its own academic programs and confers its own degrees, and has its own administration. UHCL is a stand-alone university; it is not a branch campus of the University of Houston (UH). Although UHCL and UH are both component institutions of the University of Houston System, they are separate degree-granting universities. The organization and control of the University of Houston–Clear Lake is vested in the Board of Regents of the University of Houston System. The Board has all the rights, powers, and duties that it has with respect to the organization and control of other institutions in the System; however, UHCL is maintained as a separate and distinct institution. The president is the chief executive officer of the University of Houston–Clear Lake, and the position reports to the chancellor of the University of Houston System. The president is appointed by the chancellor and confirmed by the Board of Regents of the University of Houston System. The president of the university is Ira K. Blake, who came on board just before Hurricane Harvey in 2017. She succeeded William A. Staples, who was president from 1995 to 2017. UHCL administration is located in the Bayou Building.

As owner of the property, the university has the right to regulate activities of its visitors, students, employees and contractors within its boundaries through policies and procedures designed to protect the health, safety, and welfare of all. Some of the policies/procedures include the Spill Prevention Control and Countermeasures Plan (SPCC) and the Contingency Plan for Hazardous Waste Management.

**1.2.1 Legal Authority Required Under the General Permit**

As owner and a state institution with its own police force, the University of Houston – Clear Lake has the legal authority for the following:

1. Prohibit illicit discharges and illicit connections.
2. Respond to and contain other releases (control the discharge of spills and prohibit dumping or disposal of materials other than stormwater in the MS4).
3. Require compliance with conditions in the university’s policies, procedures, contracts, or directives.
4. Require installation, implementation, and maintenance of control measures.
5. Receive and collect information (from construction site operators and other contractors) such as stormwater plans and inspection reports, necessary to assess compliance with the general permit.
6. Enter and inspect property including facilities, equipment, practices, or operations related to stormwater discharges to the MS4.
7. Respond to non-compliance with BMPs required by the university.
8. Authority to assess penalties, including monetary, civil, or criminal penalties.
9. Enter into interagency or interlocal agreements or other maintenance agreements, as necessary.

Beginning on the effective date of the TCEQ acceptance of the university’s NOI and SWMP for coverage under the General Permit, the university will undertake a process to review and revise (if necessary) relevant policies and procedures to control pollutant discharges into the MS4 in order to meet the requirements of the general permit or develop such policies and procedures.

Progress in the review of existing policies and procedures will be reported in the Annual Reports and will be completed within the first three years of the SWMP.

**1.3 Stormwater Management Program (SWMP) Requirements**

The university is required to develop a SWMP that describes specific actions that are to be taken over a five-year period to reduce pollutants and protect stormwater quality. The SWMP must also define measurable goals and provide a schedule for the implementation of BMPs over the next five years.

Phase II MS4s are categorized by population:

* Level 1: Small MS4 operators that serve a population of less than 10,000 within an Urbanized Area (UA).
* Level 2: Small MS4 operators that serve a population of at least 10,000 but less than 40,000 within a UA.

Non-traditional MS4s: This level also includes all non-traditional small MS4s regardless of population unless the non-traditional MS4 can demonstrate that it meets the criteria for a waiver from permit coverage. Examples of non-traditional small MS4s include counties, drainage districts, transportation entities, military bases, universities, colleges, correctional institutions, municipal utility districts, and other special districts.

* Level 3: Small MS4 operators that serve a population of at least 40,000 but less than 100,000 within a UA.
* Level 4: Small MS4 operators that serve a population of 100,000 or more within a UA.

By virtue of being a university, the University of Houston – Clear Lake is automatically in Level 2. Implementation of the MEP standard requires the development and implementation of best management practices (BMPs) and the achievement of measurable goals to satisfy five minimum control measures (MCMs). It is expected that when these MCMs are addressed in concert, it will result in significant reductions of pollutants being discharged into receiving water bodies.

The five MS4 program MCMs are:

1. Public Education, Outreach, and Involvement.
2. Illicit Discharge Detection and Elimination (IDDE).
3. Construction Site Stormwater Runoff Control.
4. Post-Construction Stormwater Management in New Development and Redevelopment.
5. Pollution Prevention and Good Housekeeping for Municipal Operations.

The sixth MCM (Industrial Stormwater Sources) and an optional seventh minimum control measure, to address municipal construction activities through their SWMP, have not been selected for inclusion in this SWMP. These are non-mandatory for Level 2: Small MS4 operators.

**1.4 Recordkeeping and Reporting Requirements**

A primary component of the MS4 general permit is recordkeeping that allows for periodic evaluation of the management plan and for annual reporting to the TCEQ on the status of the plan. Specifically, Phase II MS4s are required to:

1. Retain all records, a copy of the TCEQ general permit, and records of all data used to complete the NOI for a period of three years or for the term of the TCEQ permit, whichever is longer.
2. Retain a copy of the SWMP at a location accessible to the TCEQ.
3. Make the records, including the Notice of Intent (NOI) and SWMP, available to the public if requested to do so in writing. The SWMP must be made available within ten (10) working days following a written request. Other records must be provided in accordance with the Texas Public Information Act.
4. The period during which records are required to be kept shall be automatically extended to the date of the final disposition of any administrative or judicial enforcement action that may be instituted against the permittee.

**The following subsections summarize the general reporting requirements for MS4s.**

**1.4.1 Noncompliance Notification**

Under the terms of the general permit, the university must develop a standard operating procedure (SOP) to respond to violations to the extent allowable under state and local law. Any noncompliance which may endanger human health or safety, or the environment, in accordance with 30 TAC Chapter 305.125(9), must be reported by the MS4 to the TCEQ. Oral and/or facsimile notification of the noncompliance must be made immediately upon becoming aware of the issue. A written report must be provided to the TCEQ within five working days. Additionally, the MS4 must promptly submit to TCEQ any facts or information relevant to an NOI, Notice of Termination (NOT), Notice of Change (NOC), or any other report.

**1.4.2 Annual Report**

The university will submit a concise annual report to the executive director within 90 days of the end of each reporting year. The annual report must address the previous reporting year. The general permit provided three options for MS4 operators to designate as the reporting year: the permit year, the permittee’s fiscal year or the calendar year. The University of Houston – Clear Lake has elected to use the permit year as the reporting year, making annual reports to TCEQ due by January 24 of each year beginning January 24, 2020.

The annual report will include:

1. The status of the compliance with permit conditions, an assessment of the appropriateness of the identified BMPs, progress towards achieving the statutory goal of reducing the discharge of pollutants to the MEP, the measurable goals for each of the MCMs, and an evaluation of the success of the implementation of the measurable goals.
2. A summary of the results of information collected and analyzed, during the reporting period, including monitoring data used to assess the success of the program at reducing the discharge of pollutants to the MEP.
3. A summary of the stormwater activities the MS4 operator plans to undertake during the next reporting year.
4. Proposed changes to the SWMP, including changes to any BMPs or any identified measurable goals that apply to the program elements.
5. Notice that the MS4 operator is relying on another government entity to satisfy some of its permit obligations (if applicable).

The annual report will also include a summary of any proposed changes to the SWMP planned for the next reporting cycle.

**1.5 Definitions**

The definition of terms within this SWMP are those within TPDES General Permit TXR040000,

Part I – Definitions (See Appendix C).

**1.6 SWMP Changes**

This SWMP may be changed by the university at any time. According to the general permit, adding components, controls, or requirements to the SWMP, or replacing a BMP with an equivalent or better BMP only requires notification of TCEQ.

When considering eliminating a BMP, the list of BMPs by Regulatory Requirement presented in Appendix A must be reviewed to ensure that removal of the BMP will not result in noncompliance for any of the minimum control measures. If the BMP to be eliminated is the only BMP that provides compliance for a specific permit provision, then a new BMP that continues to meet the relevant permit requirement must be added to the SWMP.

A Notice of Change (NOC) must be submitted to the TCEQ for review and approval when changing the SWMP to replace an unsuccessful BMP with an alternative BMP (e.g. replacing a structural BMP with a non-structural BMP). An NOC and TCEQ approval are not required for:

1. Adding BMPs.
2. Replacing a BMP with a BMP that is substantially similar in nature to the BMP.
3. Making non-substantive changes, such as minor clarifications to the SWMP (for example, updating for department reorganization, minor clarifications of BMPs, or correction of typographical errors).
4. Adding or subtracting areas such as by annexation or de-annexation.

Specific requirements for SWMP changes and documentation of plan updates involving changes in BMPs, measurable goals, or the implementation schedule can be found in the general permit contained in Appendix C.

**2 Plan Development Process**

**2.1 BMP Selection**

The Environmental, Health and Safety Department provided guidance in the selection of BMP’s and the development of the University of Houston – Clear Lake’s SWMP. Various structural and non-structural BMP’s will be implemented throughout the five-year permit term authorized under the general permit. The university has historically been conscientious about all types of pollution prevention programs and has been proactive in developing and implementing measures intended to protect the water quality of Horsepen Bayou.

An important aspect of developing an effective, compliant, and cost efficient TPDES Small MS4 SWMP is to acknowledge these on-going programs and identify how each is related to the MCMs of the general permit. Details of the university’s existing stormwater related programs were collected, summarized, and categorized into one of the five MCM’s required by the general permit. Several of the university’s existing programs meet specific general permit requirements and contribute toward fulfilling the general permit requirement to reduce pollutants to the maximum extent practicable. Additional BMP’s were selected to supplement the university’s existing programs and to fulfill the requirements of the general permit. BMP’s were evaluated for each of the five MCM’s.

Alternative or future BMP’s should be assessed relative to the following criteria:

1. Does the BMP fulfill general permit requirements?
2. What is the perceived effectiveness of the BMP?
3. Is the BMP appropriate for the university?
4. What is the estimated cost of implementing the BMP?

**2.1.1 Measurable Goals and Implementation Schedule**

Selection of the BMPs, measurable goals, and an implementation schedule was based on what was seen as necessary and achievable by those departments who will be responsible for accomplishing the activities supporting the BMPs. Consideration was also given to whether or not inclusion of the activities in the SWMP would meet the permit requirements. Obviously, costs associated with implementing the various BMPs and measurable goals will be evaluated on an annual basis. Implementation of each BMP will be tracked as required during each year of the permit. Adjustments to the BMPs and implementation schedules will be made as necessary according to permit requirements.

**2.2 Development and Review Process**

The university departments involved in the implementation, tracking, enforcement, and assessment of the SWMP include:

1. Environmental, Health and Safety Department
2. Emergency Management and Fire Safety
3. Facilities, Maintenance and Construction
4. University of Houston – Clear Lake Police Department
5. Marketing and Communications (Branding)
6. University Computing and Telecommunications
7. Environmental Institute of Houston
8. Procurement
9. Legal

**Public Notice Process for SWMP and NOI Submittal**

Following the public review and comment period for the draft SWMP, the NOI will be prepared for submission to TCEQ along with the final SWMP. The university will then publish notice of the preliminary decision on the NOI and SWMP in accordance with TCEQ instructions. Public access to both the draft and final SWMP will be maintained through the university’s website.

As an applicant under the TPDES General Permit No.TXR040000, the university must adhere with the following public notice procedures described in Part II, Section E (12) of the general permit.

1. The university must submit an NOI and SWMP to the executive director of TCEQ. The SWMP must include information about:
2. BMPs the university will implement for each of the five MCMs, as appropriate;
3. The measurable goals for each of the BMPs, including, as appropriate the months and years in which the applicant will take the required actions, including interim milestones and the frequency of the action; and
4. The person or persons responsible for implementing or coordinating the university’s SWMP.
5. After the university receives written instructions from the TCEQ’s Office of Chief Clerk, the university must publish notice of the executive director’s preliminary decision on the NOI and SWMP.
6. The notice will include the following information, at a minimum:
7. The legal name of the university as the MS4 operator;
8. Indication that the NOI is for a new authorization;
9. The address of the university;
10. A brief summary of the information included in the NOI, such as the general location of the small MS4 and a description of the classified receiving waters that receive the discharges from the small MS4;
11. The location and mailing address where the public may provide comments to the TCEQ;
12. The public location where copies of the NOI and SWMP, as well as the executive director's general permit and fact sheet, may be reviewed; and
13. If required by the executive director, the date, time, and location of the public meeting.
14. This notice must be published at least once in a newspaper of general circulation in the municipality or county where the university is located. This notice must provide opportunity for the public to submit comments on the NOI and SWMP. In addition, the notice must allow the public to request a public meeting. A public meeting will be held if the TCEQ determines that there is significant public interest.
15. The public comment period begins on the first date the notice is published and lasts for at least 30 days. If a public meeting is held, the comment period will end at the closing of the public meeting (see paragraph (f) below). The public may submit written comments to the TCEQ Office of Chief Clerk during the comment period detailing how the NOI or SWMP for the small MS4 fails to meet the technical requirements or conditions of this general permit.
16. If significant public interest exists, the executive director will direct the university to publish a notice of the public meeting and to hold the public meeting. The university must publish notice of a public meeting at least 30 days before the meeting and hold the public meeting in a county where the small MS4 is located. TCEQ staff will facilitate the meeting.
17. If a public meeting is held, the university will describe the contents of the NOI and SWMP. The university will also provide maps and other data on the small MS4. The university will provide a sign in sheet for attendees to register their names and addresses and furnish the sheet to the executive director. A public meeting held under this general permit is not an evidentiary proceeding.
18. The university will file with the Chief Clerk a copy and an affidavit of the publication of notice(s) within 60 days of receiving the written instructions from the Chief Clerk.
19. The executive director, after considering public comment, will either approve, approve with conditions, or deny the NOI based on whether the NOI and SWMP meet the requirements of this general permit.

**3 Minimum Control Measures (MCMs)**

**3.0 MCM 0: Baseline and Annual Review of Pollutant of Concern**

The University of Houston – Clear Lake’s stormwater drains into Horsepen Bayou, which has been declared an impaired water body. The pollutant of concern (POC) is bacteria, specifically Enterococci, with a total maximum daily load (TMDL) of 783 billion MPN/day. In order to develop an initial baseline for the performance of the MCMs, the university will conduct initial monitoring of stormwater outflows and annual monitoring thereafter.

**3.0.1 Best Management Practices**

**BMP 0.01 Stormwater Outfall Monitoring**

The university will develop a plan for and conduct initial monitoring of all stormwater outflows to determine a baseline for evaluating the performance of the BMPs. Monitoring will be conducted annually thereafter. Monitoring will focus on determining if stormwater outfall exceeds the exceedance level for contact recreation which is 35 counts/100 ml.

Measurable Goals:

1. Conduct monitoring of 100% of stormwater outfalls initially.
2. Conduct monitoring of 100% of stormwater outfalls annually.

**3.1 MCM 1: Public Education, Outreach, and Involvement**

General Permit Requirement: Part B.1.(a)

All permittees shall develop, implement, and maintain a comprehensive stormwater education and outreach program to educate public employees, businesses, and the general public of hazards associated with the illegal discharges and improper disposal of waste and about the impact that stormwater discharges can have on local waterways, as well as the steps that the public can take to reduce pollutants in stormwater.

**3.1.1 Current Programs**

The University of Houston – Clear Lake requires Construction Stormwater Permits for all large-scale construction projects on any of our campuses. The university is also required to have a Spill Prevention, Control and Countermeasures (SPCC) Plan because of our above ground fuel storage tank, used oil tank, and hydraulic oil tanks on our elevators. The SPCC Plan contains our protocols for spill responses and reporting. We also have a Contingency Plan for Hazardous Waste Management which details our protocols for hazardous waste spills. The SPCC and Contingency Plans detail where our spill response materials are, methods for cleaning up, and lists of emergency response contractors. Inspections and maintenance are also part of the SPCC. These are our first and second line of defense against allowing pollutants to enter the local waterway.

**3.1.2 Best Management Practices**

**Target Audiences**

Best management practices for public education are focused on staff, faculty, university students, contractors, and visitors of the University of Houston – Clear Lake. Public involvement efforts are designed to engage residents and businesses in ongoing stormwater programs supported by the university.

**BMP 1.01 Stormwater Quality Outreach Materials**

The University of Houston – Clear Lake will develop a variety of educational brochures and leaflets that are designed to inform visitors, students, staff, and contractors of the effects of polluted stormwater runoff on Horsepen Bayou and how individuals can minimize impacts on the local environment.

Outreach materials will cover the following information:

* Bacteria discharging from residential sites either during runoff events or directly
* Fats, oils and grease clogging sanitary sewer lines and resulting overflows
* Decorative ponds
* Pet waste

The SWMP and all Annual Reports will be posted to our website (UHCL.edu) for public access.

Measurable Goals:

1. Distribute outreach materials to 100% of incoming students each semester via email.
2. Distribute outreach materials to 100% of staff annually via email.

**BMP 1.02 Pet Waste Management**

The University of Houston – Clear Lake has a very limited number of animals on site. The university does not have any stables, zoo, or other outdoor university owned animals or livestock. The only outdoor animals on site are service animals and our local wildlife. Pet waste collection dispensers will be installed on campus and distribution of bags will be recorded on the annual report.

Measurable Goals:

1. Install ten (10) pet waste collection dispensers on campus.

**BMP 1.03 Trash & Debris Management**

The University of Houston – Clear Lake has historically hosted an annual cleanup day for the campus. The university has also encouraged recycling on site. Items such as toner cartridges are accumulated and turned over to one of our vendors for recycling. Efforts such as these will be documented and new efforts will be encouraged. Existing recycling will be documented and recorded annually for benchmarking purposes. This will be recorded in the annual report.

Measurable Goals:

1. Advertise and host one community cleanup event annually.

**BMP 1.04 Classroom Education**

The Environmental Institute of Houston (EIH) hosts regular outdoor education programs that provide grade school students with information about the local environment. The EHS Department will partner with EIH to provide additional information about stormwater pollution prevention for the students and to document any existing information EIH is already providing.

Measurable Goals:

1. Provide additional education materials to 100% of participants.

**BMP 1.05 Media Access for Stormwater Education**

Evaluate and determine suitability of video presentations to be made available to public access through the university’s website.

Measurable Goals:

1. Provide public access to one stormwater education video through the university’s website.

**BMP 1.06 Storm Drain Marking**

Storm sewer outlets will be stenciled with messages indicating that stormwater collected by the inlet flows into Armand Bayou.

1. Apply inlet markers to 100% of storm sewers.

**BMP 1.07 Public Notice for Stormwater Management Program Development**

Notice of the TCEQ executive director’s preliminary determination of the NOI and SWMP will be published in the Houston Chronicle.

Measurable Goals:

1. Publish the notice provided by TCEQ and submit an affidavit of publication.

**3.2 MCM 2: Illicit Discharge Detection and Elimination**

General Permit Requirement: Part B.2.(a)

All permittees shall develop, implement and enforce a program to detect, investigate, and eliminate illicit discharges into the small MS4. The program must include a plan to detect and address non-stormwater discharges, including illegal dumping to the MS4 system.

**3.2.1 Current Programs**

Current programs of the university include continuous monitoring of the site by the University of Houston – Clear Lake Police Department. Monitoring by video camera and vehicle patrols discourages illegal dumping on our site.

**3.2.2 Best Management Practices**

**BMP 2.01 Notification of TCEQ and Other Affected Entities**

The university will develop and maintain a standard operating procedure (SOP) for notifying the TCEQ and any other affected entities of any illicit discharge and sewage overflows occurring on our site. Notification will be immediate upon finding out about the violation. Affected entities, such as the Clear Lake Water Authority, will be identified and incorporated into the policy. The SOP for will be reviewed for compliance with TCEQ requirements and effectiveness annually.

Measurable Goals:

1. Develop SOP.
2. Annually review 100% of reporting to TCEQ for compliance with the SOP.

**BMP 2.02 Stormsewer System Mapping**

The university will develop and update a map of the stormsewer system, including the location of all outfalls and the name and location of surface water receiving stormsewer outfall. Policies and procedures will be developed for updating the stormsewer system map with new, altered, and newly located stormsewer features.

Measurable Goals:

1. Map 100% of the university's stormsewer system and outfalls by the end of year 3.
2. Develop policies and procedures for updating the stormsewer system map with new, altered, and newly located stormsewer features.

**BMP 2.03 Illicit Discharge Detection and Elimination Legal Authority**

As owner of the property, the University of Houston – Clear Lake has the right to regulate activities of its visitors, students, employees and contractors within its boundaries through policies and procedures designed to protect the health, safety, and welfare of all.

Measurable Goals:

1. Develop and adopt an illicit discharge enforcement procedure.
2. Notify 100% of students every semester of the illicit discharge enforcement procedures via email.
3. Notify 100% of employees annually of the illicit discharge enforcement procedures via email.
4. Notify 100% of contractors of the illicit discharge enforcement procedures using the university’s contractor bidding requirements.
5. Train 100% of UH-CL PD officers on reporting procedures and enforcement of the illicit discharge enforcement procedures.

**BMP 2.04 Employee Information and Training**

The university will develop a program for informing and training employees in recognizing and reporting illicit discharges and connections to the MS4. The number of employees annually receiving IDDE training will be tracked and reported in the annual report.

Measurable Goals:

1. Develop a list of employee positions to be trained on the identification and reporting of illicit discharges and other reporting requirements of the SWMP.
2. Develop a training program, including materials and internal reporting forms and procedures.
3. Train 100% of listed employees.

**BMP 2.05 On-Site Sewage Facility Inspections**

The university will maintain an inventory of on-site sewage facilities (OSSFs).

Measurable Goals:

1. Develop an inventory of OSSFs on the site.
2. Develop an inspection and maintenance program for all OSSFs on the site.
3. Audit 100% of maintenance records annually.
4. Inspect 100% of OSSFs on site annually.

**BMP 2.06 Grease Trap Management (FOG Program)**

Document existing Grease Trap Management Program and determine if there are any gaps in the existing program and the requirements of the fats, oil, and grease (FOG) ordinance for grease trap installation and maintenance at non-domestic food handling establishments.

Measurable Goals:

1. Develop policy documenting existing Grease Trap Management Program.
2. Develop an inventory of all on site grease traps.
3. Monitor 100% of grease trap maintenance records annually for conformance with the provisions of the FOG ordinance.

**BMP 2.07 Sanitary Sewer Inspections**

The university will develop procedures for the detection, prevention and correction of leaks and overflows from the sanitary sewer system.

Measurable Goals:

1. Develop a site map and inventory of sanitary sewer lines on the site.
2. Develop a reporting program for overflows.
3. Develop an inspection and maintenance program for all sanitary sewer lines on the site.
4. Audit 100% of maintenance records annually.
5. Audit 100% of overflow reports annually.
6. Inspect 25% of lines annually.

**BMP 2.08 Proper Disposal of Household Hazardous Wastes**

The University of Houston – Clear Lake is classified as a Small Quantity Generator under 40 CFR 261 and falls under the requirements of the Resource Conservation and Recovery Act (USC Title 42, Sections 6921-6939f). As such, the university already has all requirements for the handling of hazardous wastes in place. One item that will be needed as the new dorms come on line is a method for students to reach out to the EHS Department if they have any hazardous wastes for disposal.

Measurable Goals:

1. Develop outreach policy to resident students so they know who to contact to dispose of household hazardous wastes.
2. Distribute informational brochures to 100% of resident students of the service.

**BMP 2.09 Establish Written IDDE Procedures**

The University of Houston – Clear Lake has its own Police Department, which provides security for the campus. Dispatch is staffed twenty-four hours a day/seven days a week and our officers currently patrol our campus twenty-four hours a day/seven days a week. Written procedures for illicit discharge detection and discharge elimination will be established to document campus security methods and provide a framework for the officers for illicit discharge detection and reporting.

Measurable Goals:

1. Develop written procedures for implementing the BMPs for Illicit Discharge Detection and Elimination.
2. Develop training for officers in the detection and reporting of illicit discharges.
3. Train 100% of officers in the detection and reporting of illicit discharges.

**3.3 MCM 3: Construction Site Stormwater Runoff Control**

General Permit Requirement: Part B.3.(a)

All permittees shall develop, implement and enforce a program requiring operators of small and large construction activities, as defined in Part I of the general permit, to select, install, implement, and maintain stormwater control measures that prevent illicit discharges to the MEP. The program must include the development and implementation of a policy as well as sanctions to ensure compliance to the extent allowable under state, federal, and local law, to require erosion and sediment control.

All construction contractors operating at the University of Houston – Clear Lake are required to submit and implement a Construction SWMP in accordance with TPDES Construction General Permit TXR150000 for their worksite. The submission will be directly to the TCEQ and a copy will be forwarded to the EHS Department via FMC.

**3.3.1 Current Programs**

The university maintains an active program of construction plan review and project inspection.

**3.3.2 Best Management Practices**

**BMP 3.01 Active Construction Site Inventory**

The university will develop a system for maintaining an inventory of permitted active construction sites ≥ 1 acre.

Measurable Goals:

1. Develop a system for maintaining an inventory of active construction sites ≥ 1 acre or less than 1 acre if part of a larger common plan or development.
2. Audit 100% of construction sites to determine effectiveness of inventory.

**BMP 3.02 Review and Maintain Legal Authority for Construction Site Runoff Control**

As owner of the property, the University of Houston – Clear Lake has the right to regulate activities of its visitors, students, employees and contractors within its boundaries through policies and procedures designed to protect the health, safety, and welfare of all.

Measurable Goals:

1. Review and update policies as needed to reflect changes in technology and to clarify requirements.
2. Review and update policies to require soil stabilization whenever clearing, grading, excavation or other earth disturbing activities have temporarily or permanently ceased.
3. Review and update policies to address prohibited construction related discharges.
4. Develop procedure for receipt and review of information submitted by the public.

**BMP 3.03 Construction Plan Review**

Develop SOP to review site plans and construction plans for all new development, redevelopment and for capital construction for conformance with the construction stormwater management plan requirements. Included in the SOP will be a method of tracking.

Measurable Goals:

1. Develop SOP for review of new project compliance with stormwater management plan requirements.

**BMP 3.04 Drainage and Water Quality Criteria Review**

University staff will review the university's drainage and water quality design criteria for consistency and compliance with university goals and objectives and state and federal mandates. The criteria will be updated as needed.

Measurable Goals:

1. Update the drainage design and water quality criteria in response to the university’s comprehensive planning process, and state and federal mandates.

**BMP 3.05 Construction Site Compliance Monitoring**

The university will institute a program of construction site inspection and enforcement of the use and maintenance of construction site BMPs.

Measurable Goals:

1. Develop a program to inspect construction sites for erosion and sedimentation control BMPs.
2. Inspect 100% of sites and enforce compliance with university policies regarding temporary erosion control.

**BMP 3.06 Training**

The university will train university personnel on the installation and maintenance of temporary erosion control BMPs at construction sites.

Measurable Goals:

1. Develop a training program, including materials and internal reporting forms and procedures.
2. Train 100% of affected staff.

**BMP 3.07 Written Procedures**

The university will develop and maintain written procedures for requiring construction BMPs for small and large construction activities.

Measurable Goals:

1. Develop written procedures for implementing the BMPs for construction activities.

**3.4 MCM 4: Post Construction Stormwater Management in New Development and Redevelopment**

General Permit Requirement: Part B.4.(a)

All permittees shall develop, implement and enforce a program, to the extent allowable under state, federal, and local law, to control stormwater discharges from new development and redeveloped sites that discharge into the small MS4 that disturb one acre or more, including projects that disturb less than one acre that are part of a larger common plan of development or sale. The program must be established for private and public development sites. The program may utilize an offsite mitigation and payment in lieu of components to address this requirement.

**3.4.1 Current Programs**

The university’s current post construction stormwater management practices include the requirement for site revegetation following construction.

**3.4.2 Best Management Practices**

**BMP 4.01 Post Construction Stormwater Management Legal Authority**

As owner of the property, the University of Houston – Clear Lake has the right to regulate activities of its visitors, students, employees and contractors within its boundaries through policies and procedures designed to protect the health, safety, and welfare of all.

Measurable Goals:

1. Review and update the university's current policy for requirements for postconstruction maintenance of BMPs for new development and redevelopment construction sites of 1 acre or more, and in projects of less than 1 acre that are part of a larger common plan.

**BMP 4.02 Long-Term Maintenance of Post Construction Stormwater Control Measures**

As owner of the property, the University of Houston – Clear Lake has the right to regulate activities of its visitors, students, employees and contractors within its boundaries through policies and procedures designed to protect the health, safety, and welfare of all.

Measurable Goals:

1. Develop Storm Sewer Maintenance Program for inspection and cleaning of inlets and storm sewers.
2. Develop policy/procedure of conducting post-storm event inspection of structural BMPs.

**BMP 4.03 Post-Construction Site Inspection and Project Acceptance**

The university will review, update, and implement project acceptance procedures to address Post Construction Storm Water Management for new development and re-development.

Measurable Goals:

1. Develop SOP for post-construction site inspection and project acceptance.
2. Post construction inspection of 100% of private construction sites for revegetation.

**BMP 4.04 Written Procedures**

The university will develop and maintain written procedures for the university's program for requiring postconstruction BMPs for small and large construction activities.

Measurable Goals:

1. Develop and maintain written procedures for implementing the BMPs for new development and redevelopment.
2. Inspect 100% of construction sites annually for compliance with postconstruction BMPs.

**BMP 4.05 Enforcement Actions**

The university will document and maintain records for all enforcement actions under MCM 4.

Measurable Goals:

1. Develop written procedures for maintenance of documentation of enforcement actions.
2. Audit 100% of enforcement actions annually.

**3.5 MCM 5: Pollution Prevention and Good Housekeeping for Municipal Operations**

General Permit Requirement: Part B.5.(a)

All permittees shall develop and implement an operation and maintenance program, including an employee training component that has the ultimate goal of preventing or reducing pollutant runoff from municipal activities and municipally owned areas including but not limited to park and open space maintenance; street, road, or highway maintenance; fleet and building maintenance; stormwater system maintenance; new construction and land disturbances; municipal parking lots; vehicle and equipment maintenance and storage yards; waste transfer stations; and salt/sand storage locations.

**3.5.1 Best Management Practices**

**BMP 5.01 Municipal Facilities and Stormwater Control Inventory**

The university will inventory and map university-owned and operated facilities and stormwater controls. The pollutant discharge potential of each facility will be assessed as a part of this inventory.

Measurable Goals:

1. Inventory all municipal facilities and storm water controls.
2. Map municipal facilities and storm water controls inventoried.
3. Assess the pollutant discharge potential of each facility.
4. Document the results of the assessment.

**BMP 5.02 Training and Education**

The university will develop and implement an employee training program that addresses stormwater quality issues, pollution prevention, and good housekeeping procedures for city operations.

Measurable Goals:

1. Develop a list of departments/divisions and employee positions to be trained in implementing pollution prevention and good housekeeping practices.
2. Develop a training program, including materials and internal reporting forms and procedures.
3. Conduct training for 100% of affected employees.

**BMP 5.03 Contractor Requirements and Oversight**

The university will initiate contractual requirements in university maintenance contracts that require contractors to comply with Pollution Prevention & Good Housekeeping BMPs adopted by the university.

Measurable Goals:

1. Identify 100% of maintenance services performed by contractors.
2. Draft contract provisions that establish contractual requirements for compliance with Pollution Prevention and Good Housekeeping practices and facility-specific stormwater management operating procedures.
3. Implement contract requirements in 100% of new contracts and by amendment to 100% of existing contracts.

**BMP 5.04 High Priority Facility-Specific SOPs**

High Priority Facilities are defined in the general permit as those facilities with a high potential to generate stormwater pollutants. The university will identify university-owned high priority facilities and implement stormwater controls at those facilities.

Measurable Goals:

1. Identify 100% of high priority facilities.
2. Develop facility-specific SOPs that identify BMPs to be installed, implemented, and maintained.
3. Develop an SOP for periodic inspections of high priority facilities.
4. Inspect 100% of high priority facilities annually.

**BMP 5.05 High Priority Facility Storm Water Controls**

The university will implement stormwater controls at high priority facilities.

Measurable Goals:

1. Establish general good housekeeping procedures.
2. Develop Spill Prevention and Response Plans for vehicle and equipment fueling and maintenance locations.
3. Develop an SOP for periodic inspections of high priority facilities.
4. Inspect 100% of high priority facilities annually.

**BMP 5.06 Site Operations Assessment**

Evaluate operations and maintenance (O&M) activities for potential to discharge pollutants.

Measurable Goals:

1. Evaluate operations and maintenance activities for pollution discharge potential and document findings.
2. Develop procedures and documentation for inspection of pollution prevention measures at university owned facilities.
3. Perform inspections of 100% of pollution prevention measures at university owned and operated facilities annually (unless otherwise indicated by federal, state, or local regulations).

**BMP 5.07 Stormsewer System O&M**

The university will develop, document, and implement an O&M program to reduce the accumulation of pollutants in catch basins and other surface drainage structures.

Measurable Goals:

1. Develop a stormsewer waste material disposal standard operating procedure (SOP).
2. Develop written procedures and documentation for periodic inspection and cleaning of catch basins.
3. After completion of the stormsewer system map (BMP 2.01), identify areas for increased inspection to detect accumulations of sediment and debris or illegal dumping.

**BMP 5.08 Street Sweeping**

The university presently operates a street sweeper for the maintenance of our roadways. The university will continue the street sweeping program to reduce accumulations of sediment and litter on our streets.

Measurable Goals:

1. Sweep 100% of university roadways annually.

**BMP 5.09 Post Construction Site Inspection and Project Acceptance**

The university will review, update, and implement project acceptance procedures to address Post Construction Stormwater Management for infrastructure projects.

Measurable Goals:

1. Revise project acceptance procedures to address Post Construction Stormwater Management.
2. Conduct warranty inspections of 100% of infrastructure projects for conformance with contract specifications for revegetation

**BMP 5.10 Waterway Litter Removal**

The university will develop a program for the removal of litter from Horsepen Bayou. The area of Horsepen Bayou to which this program will apply to will be the area which encroaches on University of Houston – Clear Lake property.

Measurable Goals:

1. Develop program for surface litter removal from Horsepen Bayou adjacent to university property.
2. Conduct biannual surface litter removal from Horsepen Bayou adjacent to university property

Appendix A – List of BMPs by MCM

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| MCM No. 1 |
| Public Education, Outreach, and Involvement |
| BMP | Description | Implementation Activities | Measurable Goals | Implementation Schedule | Responsible Department |
| 0.01 | Stormwater Outfall Monitoring | Develop plan to and monitor all stormwater outfalls. | Conduct initial monitoring of 100% of stormwater outfalls. | 06/30/21 | EHS, EIH |
| Conduct annual monitoring of 100% of stormwater outfalls. | 12/22, 12/23, 12/24, 12/25 | EHS, EIH |
| 1.01 | Storm Water Quality Outreach Materials | Distribute informational brochures for the purpose of educating visitors, students, staff and contractors on issues that impact storm water quality | Distribute outreach materials to 100% of incoming students each semester via email. | 1/31/21 | EHS, Branding |
| Distribute outreach materials to 100% of staff annually via email. | 1/31/21 | EHS, Branding |
| 1.02 | Pet Waste Management | Pet waste collection dispensers to be installed campus wide. | Install 10 pet waste collection dispensers. | 06/30/22 | EHS, FMC |
| 1.03 | Trash & Debris Management | Advertise and host one community cleanup event each year | Advertise and host one community cleanup event annually. | 12/20, 12/21, 12/22, 12/23, 12/24, 12/25 | FMC, EHS |
| 1.04 | Classroom Education | EHS Department will partner with EIH to provide additional information about stormwater pollution prevention for the students | Provide additional education materials to 100% of participants. | 12/20 | EHS, EIH |
| 1.05 | Media Access for Storm WaterEducation | Provide public access to video through university website | Provide public access to one video through the university’s website. | 12/21 | EHS, Branding, UCT |
| 1.06 | Storm Drain Marking | Apply inlet markers to storm sewerinlets | Apply inlet markers to 100% of storm sewer inlets. | 12/22 | EHS, Branding, FMC |
| 1.07 | Public Notice for SWMP Development | Comply with public noticerequirements when implementing theSWMP. | Publish notice provided by the TCEQ and submit an affidavit of publication. | 12/20 | EHS, Branding |

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| MCM No. 2 |
| Illicit Discharge Detection and Elimination |
| BMP | Description | Implementation Activities | Measurable Goals | Implementation Schedule | Responsible Department |
| 2.01 | Notification of TCEQ and Other Affected Entities | UHCL will notify the TCEQ of any illicit discharge and sewage overflows occurring on site. | Develop standard operating procedure. | 12/20 | EHS |
| Annually review 100% of reporting to the TCEQ for compliance with the SOP. | 12/21, 12/22, 12/23, 12/24, 12/25 | EHS |
| 2.02 | Stormsewer System Mapping | The university will develop a map of the stormsewer system, including the location of all outfalls and the name and location of surface water receivingstormsewer outfall  | Map 100% of UHCL’s storm sewer system and outfalls. | 12/21 | FMC |
| Develop policies and procedures for updating the storm sewer system map with new, altered, and newly located storm sewer features. | 12/21 | FMC, EHS |
| 2.03 | Illicit Discharge Detection and Elimination Legal Authority | As owner of the property, the University of Houston – Clear Lake has the right to regulate activities of its visitors, students, employees and contractors within its boundaries through policies and procedures | Develop and adopt an illicit discharge enforcement procedure | 12/21 | UHCL PD, EHS |
| Notify 100% of students every semester of the illicit discharge enforcement procedures via email. | 6/22 | EHS, MARCOM |
| Notify 100% of employees annually of the illicit discharge enforcement procedures via email. | 6/22 | EHS, MARCOM |
| Notify 100% of contractors of the illicit discharge enforcement procedures using contractor bidding requirements. | 6/22 | EHS, Procurement |
| Train 100% of UHCL PD officers on reporting procedures and enforcement of the illicit discharge enforcement procedures. | 12/21 | EHS, UHCL PD |
| 2.04 | Employee Information and Training | Develop a program for informing and training employees in recognizing and reporting illicit discharges & connections to the MS4 | Develop a list of employee positions to betrained on the identification and reporting of illicit discharges and other reportingrequirements of the SWMP. | 12/20 | EHS, FMC, UHCL PD |
| Develop a training program, including materials and internal reporting forms and procedures. | 12/21 | EHS, FMC, UHCL PD |
| Train 100% of listed employees. | 12/21 | EHS, FMC, UHCL PD |
| 2.05 | On-Site Sewage Facility Inspections | The university will maintain an inventory of all on-site OSSFs. | Develop an inventory of OSSFs on site. | 12/20 | FMC, EHS |
| Develop an inspection and maintenance program for all OSSFs on site. | 12/21 | FMC |
| Audit 100% of maintenance records annually. | 12/21, 12/22, 12/23, 12/24, 12/25 | EHS, FMC |
| Inspect 100% of OSSFs on site annually. | 12/21, 12/22, 12/23, 12/24, 12/25 | FMC |
| 2.06 | Grease Trap Management (FOG Program) | Document existing grease trap program | Develop policy documenting existing implementation of FOG Program | 6/21 | EHS, Food Handling Contractor |
| Develop inventory of all on site grease traps. | 6/21 | EHS, Food Handling Contractor |
| Monitor 100% of grease trap maintenance records annually for conformance with the provisions of the FOG ordinance. | 12/21, 12/22, 12/23, 12/24, 12/25 | EHS |
| 2.07 | Sanitary Sewer Inspections | The university will develop procedures for the detection, prevention and correction of leaks and overflows from the sanitary sewer system. | Develop a site map and inventory of sanitary sewer lines on site. | 12/21 | FMC, EHS |
| Develop a reporting program for overflows. | 12/21 | EHS, FMC |
| Develop an inspection and maintenance program for all on site sanitary sewer lines | 12/21 | FMC |
| Audit 100% of maintenance records annually. | 12/22, 12/23, 12/24, 12/25 | EHS, FMC |
| Audit 100% of overflow reports annually. | 12/22, 12/23, 12/24, 12/25 | EHS, FMC |
| Inspect 25% of lines annually. | 12/22, 12/23, 12/24, 12/25 | FMC |
| 2.08 | Proper Disposal of Hazardous Wastes  | Disposal practice in place. Need to develop outreach material to resident students for household hazardous waste pickup. | Develop outreach to resident students so they know whom to contact to dispose of household hazardous wastes. | 12/20 | EHS |
| Distribute informational brochures to 100% of resident students. | 1/21 | EHS |
| 2.09 | Establish Written IDDE Procedures | Develop & maintain written proceduresfor IDDE. | Develop written procedures for implementing the BMPs for Illicit Discharge Detection and Elimination. | 6/21 | EHS & UHCL PD |
| Develop training for officers in the detection and reporting of illicit discharges. | 6/21 | EHS & UHCL PD |
| Train 100% of officers in the detection and reporting of illicit discharges. | 9/21 | EHS & UHCL PD |

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| MCM No. 3 |
| Construction Site Stormwater Runoff Control |
| BMP | Description | Implementation Activities | Measurable Goals | Implementation Schedule | Responsible Department |
| 3.01 | Active Construction Site Inventory | Develop a system for maintaining an inventory of active construction sites ≥ 1 acre. | Develop a system for maintaining an inventory of active construction sites ≥ 1 acre or less than 1 acre if part of a larger common plan or development. | 12/21 | FMC, EHS |
| Audit 100% of construction sites to determine effectiveness of inventory. | 12/22, 12/23, 12/24, 12/25 | EHS |
| 3.02 | Review and Maintain Legal Authority for Construction Site Runoff Control | As owner of the property, the University of Houston – Clear Lake has the right to regulate activities of its visitors, students, employees and contractors within its boundaries through policies and procedures | Review and update policies as needed to reflect changes in technology and to clarify requirements | 12/22 | FMC, EHS, Legal |
| Review and update policies to require soil stabilization whenever clearing, grading, excavation or other earth disturbing activities have temporarily or permanently ceased | 12/22 | FMC, EHS, Procurement |
| Review and update policies to address prohibited construction related discharges | 12/22 | FMC, EHS, Procurement |
| Develop procedure for receipt and review of information submitted by the public. | 12/22 | FMC, EHS, MARCOM, Legal |
| 3.03 | Construction Plan Review | Review site plans and construction plans for all new development andredevelopment and for capital construction. | Develop SOP for review of new project compliance with SWMP requirements. | 12/23 | EHS, FMC, UH Systems |
| 3.04 | Drainage and Water Quality CriteriaReview | Review the university's drainage and water quality design criteria for consistency and compliance with university goals and objectives and state and federal mandates. | Update the drainage design and water quality criteria in response to the university’s comprehensive planning process, and state and federal mandates. | 12/24 | FMC, EHS |
| 3.05 | Construction Site Compliance Monitoring | The university will institute a program of construction site inspection and enforcement of the use and maintenance of construction site BMPs. | Develop a program to inspect construction sites for erosion and sedimentation control BMPs. | 12/23 | EHS, FMC |
| Inspect 100% of sites and enforce compliance. | 12/24, 12/25 | EHS, FMC |
| 3.06 | Training | Train university personnel on the installation andmaintenance of temporary erosion control BMPs at construction. | Develop a training program, including materials and internal reporting forms and procedures | 12/23 | EHS  |
| Train 100% of affected staff. | 12/23 | EHS, FMC |
| 3.07 | Written Procedures | Develop & maintain written procedures for the university's program for requiring construction BMPs for small and largeconstruction activities. | Develop written procedures for implementing the BMPs for Construction Activities | 12/23 | EHS, FMC |

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| MCM No. 4 |
| Post Construction Stormwater Management in New Development and Redevelopment |
| BMP | Description | Implementation Activities | Measurable Goals | Implementation Schedule | Responsible Department |
| 4.01 | Post Construction Storm Water Management Legal Authority | As owner of the property, the University of Houston – Clear Lake has the right to regulate activities of its visitors, students, employees and contractors within its boundaries through policies and procedures designed to protect the health, safety, and welfare of all.  | Review and update the university's current policy for requirements for post-construction maintenance of BMPs for new development and redevelopment construction sites of 1 acre or more, and in projects of less than 1 acre that arepart of a larger common plan of development, redevelopment, or sale. | 12/21 | EHS, FMC |
| 4.02 | Long-Term Maintenance of Post-Construction Storm Water ControlMeasures | As owner of the property, the University of Houston – Clear Lake has the right to regulate activities of its visitors, students, employees and contractors within its boundaries through policies and procedures designed to protect the health, safety, and welfare of all.  | Develop Storm Sewer Maintenance Program for inspection and cleaning of inlets and storm sewers. | 12/21 | FMC, EHS |
| Develop policy/procedure for conducting post-storm event inspection ofstructural BMPs. | 12/21 | FMC, EHS |
| 4.03 | Post Construction Site Inspection and Project Acceptance | Review, update, and implement projectacceptance procedures to address Post Construction Storm Water Managementfor new development and redevelopment. | Develop SOP for post-construction site inspection and project acceptance. | 12/22 | FMC, UH Systems, EHS |
| Develop policy/procedure of conduction post-storm event inspection of structural BMPs. | 12/22 | FMC, EHS |
| 4.04 | Written Procedures | Develop & maintain written proceduresfor the university's program for requiring postconstructionBMPs for small and largeconstruction activities. | Develop and maintain written procedures for implementing post construction BMPs. | 12/23 | FMC, EHS |
| Inspect 100% of construction sites annually for compliance with post construction BMPs. | 12/24, 12/25 | FMC, EHS |
| 4.05 | Enforcement Actions | The University will document and maintain records for all enforcement actions under MCM 4 | Develop procedures for maintenance of documentation of enforcement actions | 12/23 | EHS, FMC |
| Audit 100% of enforcement actions annually. | 12/24, 12/25 | EHS, FMC |

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| MCM No. 5 |
| Pollution Prevention & Good Housekeeping for University Operations |
| BMP | Description | Implementation Activities | Measurable Goals | Implementation Schedule | Responsible Department |
| 5.01 | Municipal Facilities & Storm Water Control Inventory | Maintain an inventory of university-owned and operated facilities and storm water controls; and assess the pollutant discharge potential of each facility. | Inventory all municipal facilities and storm water controls | 12/23 | FMC, EHS |
| Map municipal facilities and storm water controls inventoried. | 12/23 | FMC, EHS |
| Assess the pollutant discharge potential of each facility. | 12/23 | FMC, EHS |
| Document the results of the assessment. | 12/23 | FMC, EHS |
| 5.02 | Training and Education | Develop and conduct training for university employees that addresses storm water quality issues, pollution prevention, and good housekeeping procedures for city operations. | Develop a list of departments/divisions and employee positions to be trained in implementing pollution prevention and good housekeeping practices. | 12/20 | EHS, FMC |
| Develop a training program, including materials and internal reporting forms and procedures. | 12/21 | EHS, FMC |
| Conduct training for 100% of affected employees. | 12/21 | EHS |
| 5.03 | Contractor Requirements and Oversight | Initiate contractual requirements for university maintenance contractors to comply with Pollution Prevention & Good Housekeeping BMPs. | Identify 100% of maintenance services performed by contractors. | 6/21 | FMC |
| Draft contract provisions that establish contractual requirements for compliance with Pollution Prevention and Good Housekeeping practices and facility-specific stormwater management operating procedures. | 12/23 | EHS, FMC, Legal, Procurement |
| Implement contract requirements in 100% of new contracts and by amendment to 100% of existing contracts. | 12/24 | EHS, FMC, Legal, Procurement |
| 5.04 | High Priority Facility-Specific SOPs | Develop facility-specific SOPs and storm water controls for high priorityfacilities. | Identify 100% of high priority facilities | 12/21 | EHS. FMC |
| Develop facility-specific SOPs that identifies BMPs to be installed, implemented, and maintained. | 12/22 | EHS, FMC |
| Develop an SOP for periodic inspections of high priority facilities | 12/22 | EHS, FMC |
| Inspect 100% of high priority facilities annually | 12/22, 12/23, 12/24, 12/25 | EHS, FMC |
| 5.05 | High Priority Facility Storm Water Controls | The university will implement stormwater controls at high priority facilities | Establish general good housekeeping procedures | 12/21 | EHS, FMC |
| Develop Spill Prevention and Response Plans for vehicle and equipment fueling and maintenance locations | 12/21 | EHS |
| Develop an SOP for periodic inspections of high priority facilities | 12/22 | FMC |
| Inspect 100% of high priority facilities annually. | 12/22, 12/23, 12/24, 12/25 |  |
| 5.06 | Site Operations Assessment | Evaluate O&M activities for potential to discharge pollutants. | Evaluate operations and maintenance activities for pollution discharge potential and document findings. | 12/22 | EHS, FMC |
| Develop procedures and documentation for inspection of pollution prevention measures at university owned facilities annually. | 6/23 | EHS, FMC |
| Perform inspections of pollution prevention measures at 100% of university owned facilities annually (unless otherwise indicated by federal, state, or local regulations). | 12/23, 12/24, 12/25 | EHS, FMC |
| 5.07 | Stormsewer System O&M | Develop and implement an O&M program to reduce the accumulation ofpollutants in catch basins and other surface drainage structures | Develop a stormsewer waste material disposal SOP. | 12/21 | EHS, FMC |
| Develop written procedures and documentation for periodic inspection and cleaning of catch basins. | 12/22 | EHS, FMC |
| After completion of the stormsewer system map (BMP 2.02), identify areas for increased inspection to detect accumulations of sediment and debris orillegal dumping. | 6/22 | EHS, FMC |
| 5.08 | Street Sweeping | Practice in place - continue the street sweeping program toreduce accumulations of sediment and litter on UHCL streets. | Sweep 100% of university roadways annually. | 12/20, 12/21, 12/22, 12/23, 12/24, 12/25 | FMC |
| 5.09 | Post Construction Site Inspection and Project Acceptance | Review, update, and implement projectacceptance procedures to address Post Construction Stormwater Managementfor public infrastructure projects. | Revise project acceptance procedures to address Post Construction Stormwater Management | 12/23 | FMC |
| Conduct warranty inspections of 100% of infrastructure projects for conformance with contract specifications for revegetation. | 12/24, 12/25 | FMC |
| 5.10 | Waterway Litter Removal | The university will develop a program for the removal of litter from Horsepen Bayou.  | Develop program for surface litter removal from Horsepen Bayou adjacent to university property | 12/21 | FMC, EHS, EIH |
| Conduct biannual surface litter removal from Horsepen Bayou adjacent to university property | 12/22, 12/23, 12/24, 12/25 | FMC |

Appendix B – Phase II Permit Notice of Intent (NOI)

<https://www.uhcl.edu/about/administrative-offices/environmental-health-safety/documents/enviromental-ms4-noi.pdf>

Appendix C – TPDES General Permit TXR040000

This link will take you to the [TCEQ website for Phase II (Small) Municipal Separate Storm Sewer System (MS4)](https://www.tceq.texas.gov/permitting/stormwater/ms4/WQ_ms4_small_TXRO4.html)

Appendix D – Annual Report Form and Checklist

Appendix E – SPCC Plan

<https://www.uhcl.edu/about/administrative-offices/environmental-health-safety/documents/enviromental-spcc-plan.pdf>