

APPENDIX A

ARKANSAS STATE MS4 STORM WATER PERMIT

APPENDIX B

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APPENDIX C

LOG OF CHANGES
TO
STORM WATER MANAGEMENT PLAN
AND
COPIES OF CORRESPONDENCE WITH ADEQ
WITH REGARD TO SUCH CHANGES

APPENDIX D

**STORM WATER MANAGEMENT PLAN
ANNUAL REPORTS TO ADEQ**

**STORM WATER MANAGEMENT PLAN
ARKANSAS STATE UNIVERSITY
JONESBORO, ARKANSAS**

**PREPARED FOR:
ARKANSAS STATE UNIVERSITY
JONESBORO, ARKANSAS**

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MAY 24, 2005

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**ARKANSAS STATE UNIVERSITY
JONESBORO, ARKANSAS
STORM WATER MANAGEMENT PLAN**

1.0 INTRODUCTION

1.1 Regulatory Background

A Storm Water Management Plan (SWMP) is required for Arkansas State University (ASU) in Jonesboro, Arkansas, under the U.S. Environmental Protection Agency (U.S. EPA) Phase II storm water regulations, promulgated under the Federal Clean Water Act. These regulations require ASU to obtain coverage under a National Pollutant Discharge Elimination System (NPDES) permit. ASU submitted a Notice of Intent to be covered under the Regulated Small Municipal Separate Storm Sewer System (MS4) Storm Water Runoff General Permit (ARR040000) general permit on June 14, 2004. An NPDES Regulated Small MS4 Storm Water Permit was issued to ASU by the Arkansas Department of Environmental Quality (ADEQ) on June 15, 2004, and assigned permit tracking No. ARR040037. A copy of the ASU permit is included in Appendix A, of this Storm Water Management Plan (SWMP). The permit covers storm water discharges associated with the ASU (MS4) and requires ASU to develop a SWMP and report annually on progress. This SWMP outlines activities for the implementation period of June 15, 2004 through January 31, 2009.

In 1990, U.S. EPA promulgated rules establishing Phase I of the NPDES storm water program. The Phase I program for MS4s requires operators of “medium” and “large” MS4s—that is, those that generally serve populations of 100,000 or greater—to implement a storm water management program as a means to control polluted discharges from these MS4s. The Storm Water Phase II Rule extends coverage of the NPDES storm water program to “small” MS4s including federal and state facilities, but takes a slightly different approach to developing and implementing the storm water management program.

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

The NPDES General Permit requires applicable dischargers to prepare and implement a SWMP in order to:

- Reduce the discharge of pollutants to the “maximum extent practicable” (MEP);
- Protect water quality; and

- Meet the appropriate water quality requirements of the Clean Water Act and any applicable State plan.

1.2 Purpose of the Storm Water Management Plan

This document has been developed to comply with requirements of the ADEQ issued NPDES Regulated Small MS4 Storm Water Permit issued to Arkansas State University. This SWMP covers the Jonesboro campus of ASU.

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

1.3 Storm Water Management Committee

A Storm Water Management Committee (SWMC) was created so that representatives of various campus departments and student groups could provide input into development and implementation of the SWMP. The SWMC members represent the following departments and groups.

- Environmental, Health and Safety;
- Facilities Management Construction;
- Environmental Sciences/Biology;
- Residence Life;
- Facilities Management (Grounds Services, Maintenance);
- Parking Services; and
- Student Government Association

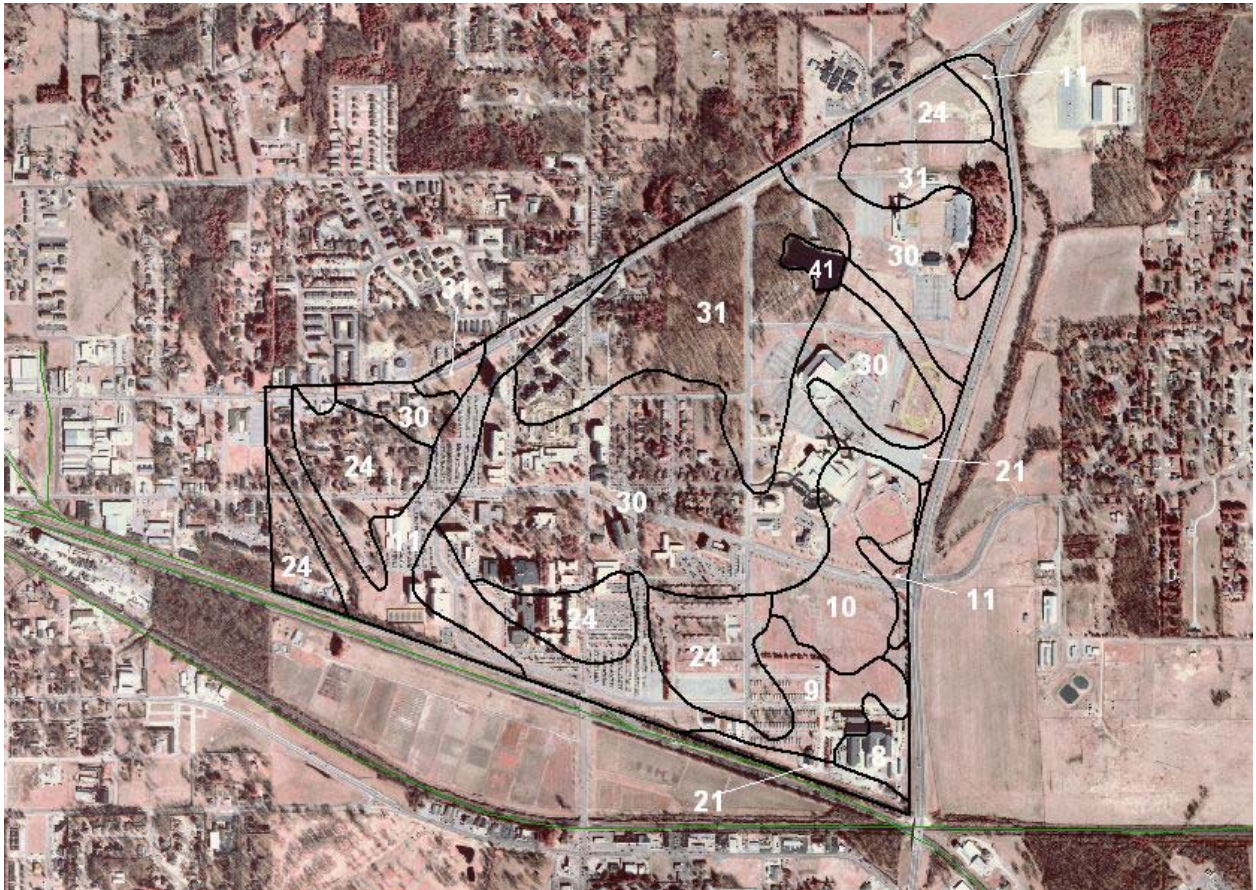
2.0 SITE INFORMATION

2.1 Facility Description

The ASU-Jonesboro campus is one (1) of seven (7) ASU campuses within the Arkansas State University regional system. The university is located within the city limits of the City of Jonesboro in northeast Arkansas, Figure 1, Appendix B. As shown in Figure 2 in Appendix B, property included within the boundaries of the ASU-Jonesboro campus includes: (1) Main Campus, comprising the academic, administrative, and service departments, dormitories; (2) Athletic Fields, stadium complex, undeveloped areas, and the Convocation Center which includes a variety of athletic fields, parking lots, and a large pond; (3) Farm Facilities, which include: Equine Center, pasture lands, swine and cattle research facilities, crop production research area, and an irrigation test area. A legend for Figure 2 is attached to identify the campus buildings and facilities.

The ASU-Jonesboro campus MS4 is located to the northeast of the City of Jonesboro MS4, which is permitted separately from the ASU campus and will have its own SWMP. ASU-Jonesboro will use State Laws and ADEQ regulations addressing storm water issues as the legal authority for enforcing storm water regulations on campus.

The site was evaluated for potential storm water runoff. The land, as shown below, is in Craighead Company in T14N, R4E, Sections 9, 16, and 17. The Craighead Company Soil Survey shows the area to contain Calhous (8), Calloway (9 and 10), Collins (11), Falaya (21), Grenada (24), and Loring (30 and 31) soil series. The map provided below elevates these soil zones within the campus region.



The average annual rainfall for the Jonesboro area is approximately 47.2 inches. ASU's population for year 2004-2005 including students, faculty, and staff was approximately 11,800.

2.2 Facility Operation

ASU employs maintenance, custodial, and grounds staff for day-to-day university operations. This includes building maintenance (cleaning, painting, repairs), completion of department work requests, cleaning of common buildings, grounds maintenance, small construction jobs, and various repair and maintenance activities. University staff and outside contractors perform electrical, plumbing, utility, roofing, asphalt repairs, exterior building painting, sewer line cleaning and janitorial duties. The departments responsible for these activities include Physical Facilities and Resident Life.

Seven (7) aboveground storage tanks containing diesel and unleaded gasoline are located at various sites on the ASU property. Spill prevention and containment; fill procedures, and countermeasure procedures are addressed in detail in the ASU Spill Containment and Countermeasure Plan.

3.0 POTENTIAL SOURCES OF STORM WATER CONTAMINATION

In order to aid in the identification of pollutant sources, the Storm Water Management Committee and consultants that developed this SWMP utilized information on historic storm water issues as well as knowledge of day-to-day operations to identify activities and sources of potential pollutants of concern. The BMPs to address the pollutant sources and activities described on Table 3-1 will be developed and implemented as described in the Section 5.0.

**Table 3-1
Pollutant Activity/Sources**

Activity/Source	Pollutants of Concern
Animal Wastes (from Farm areas)	Fecal coliform, nutrients
Building maintenance (washing, graffiti, abatement)	Wash water, paint chips, cleaning products, dirt and sediment
Chemical spills	Various cleaning compounds, diesel, paint, hazardous materials, vehicle fluids
Construction activities	Concrete, drywall, paint, sediment
Erosion	Sediment, organic matter
Food service operations	Wash water, food residue, oil and grease
Grounds maintenance	Green waste, fuel, oil, pesticides, herbicides, sediment
Impervious areas	Increased flows and pollutant loading
Irrigation runoff	Fertilizers, pesticides, reclaimed water
Litter and debris	Litter and debris
Loading/unloading areas	Petroleum products, fertilizers, pesticides, herbicides, cleaning solutions, paint
Outdoor storage of raw materials	Sand, asphalt, soil, pesticides, herbicides, fertilizer, paint, solvents, fuel
Painting (indoor)	Paint or rinse water (oil and water based), paint thinner
Parking lot runoff	Oil/grease, litter, heavy metals
Roof runoff	Particulate matter and associated pollutants
Sewer line blockages/seepage	Raw sewage
Trash storage areas	Organic materials, hazardous materials
Vehicle and equipment washing (staff)	Cleaning products, oil/grease, vehicle fluids
Pet feces	Coliform bacteria

4.0 MINIMUM CONTROL MEASURES

4.1 Minimum Control Measures and Best Management Practices (BMPS)

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

- Public Education and Outreach on Storm Water Impacts;
- Public Involvement / Participation;
- Illicit Discharge Detection and Elimination;
- Pollution Prevention / Good Housekeeping for Facilities Operation and Maintenance;
- Construction Site Storm Water Runoff Control; and
- Post-construction Storm Water Management in New Development and Redevelopment.

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

4.2 How To Use BMPS To Meet Permit Requirement

The BMPs described in Section 5.0 will be implemented by ASU staff and outside contractors. Whenever ASU staff or contractors perform work at ASU, procedures outlined for each relevant BMP, or other proven technique that reaches the same goal, must be used in order to ensure compliance with storm water discharge regulations.

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

5.0 DEVELOPMENT AND IMPLEMENTATION OF BMPS

The BMPs will be implemented by the ASU students, faculty, and staff. Implementation will be the responsibility of specific campus groups and departments. Each BMP is associated

with one or more of these groups/departments. The following list of acronyms identifies each group and department that is referenced in the following sections:

- Environmental Health and Safety - *EHS*
- Facilities Management - *PM*
- Facilities Management Construction – *FM-Con*
- Residence Life - *RL*
- Parking Services - *UPkS*
- Convocation Center - CCtr
- Student Government Association – *SGA*
- Environmental Sciences/Biology – *ESD*
- Department Safety Representatives - *DSR*

5.1 Public Education and Outreach On Storm Water Impacts

The goal of this minimum control measure is to ensure greater public awareness and compliance for the storm water management program. Specifically, this minimum measure is intended to teach the “public”(students, faculty, and staff) the importance of protecting storm water quality, for the benefit of both the environment and human health.

PERMIT REQUIREMENTS:

- Implement a public education program to distribute educational materials to students, faculty, and staff or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.

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

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

Year	BMP	Current Status	Implementation Details	Measurable Goal	ASU Depts.
1	On-line links to storm water education materials	Websites with storm water information and materials have been identified	Links to existing websites with storm water information and materials will be added to the ASU website.	Development of storm water web page	EHS
1	Identify available storm water education materials and brochures	Complete	Materials available from ADEQ, EPA and other agencies have been identified. ASU will review these materials and decide which materials to use with other BMPs.	Number of items reviewed.	Committee
2	Tributary signage	In Progress	Signs indicating waterways will be posted.	Number of signs.	FM
3	Storm water web page for ASU website	None	A web page will be added to the ASU website containing storm water information specific to ASU. Links to other websites containing storm water information will be moved to this page.	Number of hits to this page.	EHS
3	Student education	Student Orientation Packet exists, storm water material needs to be added	Student Orientation - Include storm water awareness material. Update will consist of a brief paragraph and links to the storm water web page.	Number of packets distributed	EHS RL SGA
3	Employee awareness	None	Incorporate storm water education materials into new employee information packets	Number of Packets distributed	EHS
3	Distribute storm water awareness brochures	Materials available from ADEQ, EPA and other agencies have been identified.	ASU will Select materials to be distributed on campus to promote storm water awareness. Once materials are selected, a mechanism for printing and distribution of such materials will need to be determined. Once available, materials will be distributed at information centers, student life center, and other appropriate outlets.	Number of brochures distributed	EHS ESD SGA RL CCtr

5.2 Public Involvement/Participation

The goal of this minimum control measure is to foster active public support for the SWMP and direction as to its implementation. Participation by the students, faculty, and staff ensures that the program reflects community values and priorities and thus has the highest potential for success.

PERMIT REQUIREMENTS:

- At a minimum, comply with State and local public notice requirements when implementing a public involvement participation program.

Table 5-2 presents selected BMPs for this minimum measure. The table identifies the current status of each BMP as well as the implementation details, the implementation year, measurable goals and the ASU-Jonesboro departments that will be responsible for implementation.

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

Year	BMP	Current Status	Implementation Details	Measurable Goal	ASU Depts.
1	Storm Water Management Committee (SWMC)	Approval for the SWMC has been issued.	The SWMC will meet semi-annually (2 times per year). The group will review progress of BMPs, active construction site status, new development and other storm water topics. Participation in the SWMC will include: EHS, FM, FM-Con, CCtr, ESD, UPkS, RL, SGA	Number of meetings held	Various
2	Investigate participation in Arkansas Stream Team program	Initial contact has been made with Stream Team.	Evaluate Stream Team program to evaluate the potential for ASU to participate in this program.	Commitment to the Stream Team Program or determination that ASU is not able to participate.	EHS ESD
3	Participate in community environmental awareness events	Ex. Earth Day	Provide a display and storm water education materials at appropriate on-campus events.	Number of events attended	EHS ESD SGA
3	Articles in a campus publication	None	Provide articles for publication on different aspects of storm water awareness: illicit discharge detection and elimination, erosion and sedimentation, etc.. Articles to be published at least semi-annually.	Number of articles published	EHS ESD SGA

5.3 Illicit Discharge Detection and Elimination

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

PERMIT REQUIREMENTS:

- Develop, implement and enforce a program to detect and eliminate illicit discharges (as defined at 40 Code of Federal Regulations (CFR) § 122.26(b)(2)) on the University property.
- Develop a storm sewer system map showing the location of all outfalls and the names and locations of all waters of the U.S. that receive discharges from those outfalls.
- To the extent allowable under State or local law, effectively prohibit, through ordinance or other regulatory mechanism, non-storm water discharges into the University and implement appropriate enforcement procedures and actions.
- Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to the system that are not authorized by a separate NPDES permit.
- Inform students, faculty, and staff of the hazards that are generally associated with illegal discharges and improper disposal of waste.
- Address categories, as outlined in the permit, of non-storm water discharge or flows only if identified as significant contributors of pollutants to the University.

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

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

Year	BMP	Current Status	Implementation Details	Measurable Goal	ASU Depts.
1-3	Develop and refine map of storm water conveyance system for ASU	In development.	Year 1: Develop an initial map of the storm water conveyance system including outfalls and receiving streams. During years 2 and 3 additional detail and flows shall be added.	Map	FM
2	Visual inspection of outfalls during dry weather	None	Develop a program and checklist for visual inspection of storm water outfalls. Illicit discharges (IDs) identified by this program will be reported to EH&S for follow-up if necessary.	Number of inspections performed.	EHS
2-3	Add training unit for detection and reporting of illicit discharges to employee training programs.	None	Develop and implement an storm water/illicit discharge identification training module to employee training programs for Farm, Maintenance, Grounds and Parking Team employees.	Year 2: Number of Training programs implemented. Year 3: Number of employees trained.	EHS
2	Address reported illicit discharges.	EHS investigates reports of illicit discharges.	Develop system for informing the university population, employees and staff about illicit discharges and where to report them. This will overlap with BMPs listed for public education, including storm water education materials, news articles, training programs, and the storm water web page.	Number of IDs reported and investigated	EHS
2-3	Work with City of Jonesboro on storm water ordinance issues	In progress	ASU uses the ordinances for the City of Jonesboro as the legal authority for enforcement action. ASU will keep in touch with the City to monitor progress in ordinance development.	Ordinance passed.	EHS

5.4 Construction Site Storm Water Runoff Control

The goal of this minimum control measure is to prevent soil and construction waste at construction sites from entering the storm water conveyance system.

PERMIT REQUIREMENTS:

- Develop and implement an ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions or other effective mechanisms, to ensure compliance, to the extent allowable under State or local law.
- Develop and implement requirements for construction site operators to implement appropriate erosion and sediment control BMPs.
- Develop and implement requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality.
- Develop and implement procedures for site plan review that incorporate consideration of potential water quality impacts.
- Develop and implement procedures for receipt and consideration of information submitted by the public.

- Develop and implement procedures for site inspection and enforcement of control measures.

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

**Table 5-4
BMP Implementation: Construction Site Storm Water Runoff Control**

Year	BMP	Current Status	Implementation Details	Measurable Goal	ASU Depts.
1-2	Develop new ASU guidelines to address Construction erosion and sediment control requirements.	None	Standard will address erosion and sedimentation control requirements, and require that construction contractors be responsible for filing under the General Permit. Contractors will be required to submit a Storm Water Pollution Prevention Plan (SWPPP) to the SWMC. Guidelines and requirements will be included in contracts for construction projects.	Completed and implemented in construction contracts.	EHS/FM-Con
2	Develop SWPPP outline for construction contractors.	None	EHS will develop a Site Specific SWPPP skeleton and the construction contractor will develop the site specific SWPPPs.	SWPPP outline available for contractors.	EHS/FM-Con
3	Site plan review for construction contractors.	None	Develop a review procedure for all construction plans and SWPPP. Members of the SWMC and the Construction Coordinator will conduct review.	Number of plans reviewed.	EHS/FM-Con
3	Routine inspection of construction sites	None	Develop a checklist of items to be included in routine inspections of construction sites. Provide mechanism for documentation of inspections, follow-up actions and results.	Number of inspections and violations	EHS/FM-Con
4	Enforcement of non-compliance with storm water requirements	None	Provide enforcement mechanism for non-compliance of contractors with storm water discharge requirements. This will involve coordination of Construction Contract Coordinator, EHS, ASU legal department, and City government (City ordinance will be the legal authority for enforcement actions.)	Enforcement policies and procedures established.	EHS/FM-Con

5.5 Post-Construction Storm Water Management In New Development And Redevelopment

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

Post-construction storm water management controls include permanent structural and non-structural BMPs (e.g., conservation of natural and permeable areas, permeable pavers, rooftop runoff infiltration galleries, and mechanical storm drain filters) that remain in place after the project is completed.

Projects subject to the new standards are new developments that create more than 1 acre of impervious surface and redevelopment projects that replace more than 1 acre of impervious surface (such as redevelopment on a surface parking lot). In 2006, the threshold will be reduced to 5,000 square feet.

PERMIT REQUIREMENTS:

- Develop, implement, and enforce a program to address storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one that are part of a larger common plan of development or sale, that discharge into the University by ensuring that controls are in place that would prevent or minimize water quality impacts.
- Develop and implement strategies, which include a combination of structural and/or nonstructural BMPs appropriate for the University.
- Use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under State or local law.
- Ensure adequate long-term operation and maintenance of BMPs.

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

**Table 5-5
BMP Implementation: Post-Construction Storm Water**

Year	BMP	Current Status	Implementation Details	Measurable Goal	ASU Depts.
3	Enhance the design review cycle to include other ASU departments associated with storm water quality	None	Expand the design review group to include the SWMC, grounds, engineering, and other relevant organizations.	Completed	
3	Include contract language for specifications for storm water management in post construction phase.	None	Identify appropriate contract language to address post construction requirements for storm water managements for construction projects.	Contract modifications completed	FM-Con

**5.6 Pollution Prevention/Good Housekeeping For Facilities
Operation and Maintenance**

The goal of this minimum control measure is to assure that ASU-Jonesboro facility operations and maintenance activities occur in a manner protective of storm water quality.

PERMIT REQUIREMENTS:

- Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from University operations.
- Using training materials that are available from EPA, the State, or other organizations, include employee training to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet building maintenance, new construction and land disturbances, and storm water system maintenance.

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

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

Year	BMP	Current Status	Implementation Details	Measurable Goal	ASU Depts.
1	Street sweeping	Existing	Continue existing street sweeping program	Number of tons collected	FM
1	Parking lot inspections	Existing	Parking lot inspections are conducted and whenever any storm drain maintenance is noted, a request is forwarded to Grounds.	Number of maintenance issues reported to Grounds	UPkS
1	Trash cleanup	Existing	Trash pickers are employed for one hour each day to pick up trash from campus areas.	Hours of trash picking	FM
1	Recycling	Existing	Recycling collection sites are available for aluminum cans, paper, and scrap metal.	Volume of materials collected for recycling	FM
2	Provide training for Physical Facility (FM) employees regarding waste management, and recycling	None	Training for appropriate employees completed. Recycling program fully implemented.	Number of personnel trained	EHS/FM
3	Upgrade storm drain maintenance and cleaning program	Cleaning is done as need following storm events.	Update the master list of storm water conveyances, and outfalls, establish a maintenance schedule, and initiate additional maintenance as needed. List should include fossil filters and retention basins.	Number of storm drains cleaned	FM

6.0 RECORD KEEPING

6.1 SWMP Updating

The SWMP will be reviewed annually by the SWMC. ASU will update the SWMP whenever changes in activities or operations occur that may significantly affect the discharge of storm water pollutants.

In the event ASU identifies additional BMPs or storm water controls, not outlined in the this plan, ASU may modify the SWMP and notify ADEQ in writing of such changes. If a control or BMP is deemed ineffective, ASU may request authorization to modify the BMP or control by notifying ADEQ of the proposed changes in writing. Unless denied, such requested changes may be implemented 60 days after submitting the request. A request for a modification must include:

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

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

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

6.2 Monitoring

ASU does not discharge storm water to receiving streams subject to Total Maximum Daily Load requirements and is not subject to monitoring requirements.

6.3 Record Keeping

The storm water permit requires ASU to retain all required records including a copy of the NPDES permit, records of all data used to complete the Notice of Intent, and annual reports for a period of at least three (3) years or for the term of permit, whichever is longer. Annual reports will be filed in Appendix D of this document. Correspondence regarding administration of this SWMP can be filed in Appendix E. This period may be extended by request of the permitting authority at any time.

ASU shall submit any records to the permitting authority upon request. ASU must also make all records, including the notice of intent (NOI) and the description of the SWMP, available to the public if requested in writing.

6.4 SWMP Annual Reports

The university must submit annual reports to the ADEQ for each year of the permit term. The first report is due 15 months from the effective date of the permit, covering the activities of the permittee during the 12 months from the effective date of the permit. Subsequent annual reports are due on the same date for each of the following years during the remainder of the permit term. The reporting date for ASU will be September 15th of each year. The first submission will be September 15, 2005. The report will summarize the activities performed throughout the previous 12 months for the reporting period (June 15 through June 14) and must include the following:

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

Annual Reports must be submitted to the:

Arkansas Department of Environmental Quality
P. O. Box 8913
Little Rock, Arkansas 72219-8913
Attention: Storm Water Section