



**ARIZONA DEPARTMENT  
OF  
ENVIRONMENTAL QUALITY**



**AZPDES SMALL MS4 ANNUAL REPORT**

**LTF ID #: 91987**

**Report #: 72408**

**Phoenix Office**

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# AZPDES SMALL MS4 ANNUAL REPORT - SUMMARY

## Company:

**Name:** ARIZONA BOARD OF REGENTS, NORTHERN ARIZONA UNIVERSITY

## Question: Which permit/registration/certificate is this report for?

Answer: 11/17/2021 - 06/30/2022

## Question: Did you assess and evaluate the Stormwater Management Program (SWMP) as part of preparing the Annual Report, per permit Section 4.0?

Answer: Yes

## Question: Did you have another entity implement control measures on behalf of the MS4 per permit Section 6.0(2)? If Yes, identify the entity and give a brief explanation of their involvement.

Answer: No

## Question: Did you provide outreach and education to the public on the stormwater program issues and requirements, per permit Section 6.1(1)?

Answer: Yes

### Identify the target group for outreach and education:

General Public

### Identify the topic(s) for the target group:

Illicit discharges and illegal dumping, proper management of non-stormwater discharges, and to provide information on reporting spills, dumping, and illicit discharges

Potential impacts of animal waste on water quality and the need to clean up and properly dispose of pet waste to minimize runoff of pollutants in stormwater

Potential water quality impacts of application of pesticides, herbicides and fertilizer and control measures to minimize runoff of

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pollutants in stormwater

**Describe how the message was conveyed to the target group:**

Information posted on NAU Environmental Health & Safety stormwater web page.

**Describe measures/methods used to assess the effectiveness of the message conveyed to the target group:**

None determined at the time. However, in the wake of the ADEQ MS4 inspection in the summer of 2022., this discrepancy will be corrected as NAU is collaborating with the City of Flagstaff's outreach efforts and effectiveness will be subsequently measured.

**Question: Did you provide outreach and education to the public on the stormwater program issues and requirements, per permit Section 6.1(2)?**

Answer: Yes

**Identify the target group for outreach and education:**

Community/Home Owner Association

**Identify the topic(s) for the target group:**

Illicit discharges and proper management of non-stormwater discharges

Planning ordinances and grading and drainage design standards for stormwater management in new developments and significant redevelopments

Post-construction ordinances and long-term maintenance requirements for permanent stormwater controls

**Describe how the message was conveyed to the target group:**

In the Building Managers handbook and "Standards of Residence" policies for the residential community.

**Describe measures/methods used to assess the effectiveness of the message conveyed to the target group:**

None at the time but this will be corrected through collaboration with the City of Flagstaff outreach programs/agendas and effectiveness can be subsequently measured.

**Question: Did you post the SWMP and the current Annual Report on your website, per permit Section 6.2(1)?**

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Answer: Yes

**Upload the SWMP.**

**File Name:** ADEQswmp.doc

**Question: Did you provide and publicize a reporting system to facilitate and track public reporting of spills, discharges and/or dumping to the MS4 on a continuous basis, per permit Section 6.2(4)?**

Answer: Yes

**Question: Provide a narrative description of the status of the storm sewer mapping, per permit Section 6.3(1).**

Answer: Mapping of all NAU storm lines and access points (lid covers) is completed within the GIS office and is available for electronic review. All central and south campus lines drain into the ephemeral Sinclair Wash and a portion of the north campus lines discharge to the City conveyance lines which ultimately discharge to the Rio de Flag to the north and east of campus.

**Question: Did you establish an ordinance or other regulatory mechanism for enforcement procedures of the Illicit Discharge Detection & Elimination (IDDE) Program, per permit Section 6.3(2)?**

Answer: Yes

**What is the citation of the ordinance or other regulatory mechanism to prohibit non-stormwater discharges into the MS4?**

NAU's Enforcement Response Plan is online and available via the Environmental Health & Safety web site.

**Question: Did you establish or update the Statement of IDDE Program Responsibilities, per permit Section 6.3(3)?**

Answer: Yes

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**Provide IDDE activities in a tabular format, per permit Section 6.3(4).**

File Name: NAU2021.2022.xlsx

**Question: Did you visually monitor at least 20% of all outfalls during the permit year, per permit Section 6.3(7)?**

Answer: Yes

**Question: Did you identify indicators of IDDE Program progress or success, per permit Section 6.3(8)?**

Answer: Yes

**Question: Did you provide annual staff training, per permit Section 6.3(9)?**

Answer: Yes

**How many staff attended?:** 16

**What was the topic?:** Illicit discharge detection/observation and communication channels for corrective action.

**Question: Did you establish an ordinance or other regulatory mechanism for enforcement procedures of the Construction Activity Stormwater Runoff Control Program, per permit Section 6.4(2)(a)?**

Answer: Yes

**What is the citation of the ordinance or other regulatory mechanism to prohibit non-stormwater discharges into the MS4?**

NAU internal Technical Standards and Design Guidelines (DG). The DG specifies the requirement of a site-specific SWPPP and issued to the general contractor before project work commences. Section 5 of the DG is entitled "Stormwater Drainage Design & Surface Water Procedures". Also incorporates certain components of the City of Flagstaff's "Low Impact Development Plan". Technical Standard 01 56 39.

**Question: Did you implement a construction site inventory, per permit Section 6.4(2)(b)?**

Answer: Yes

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**Question: Did you develop written procedures for site plan review, per permit Section 6.4(2)(c)?**

Answer: Yes

**Question: Did you implement written procedures for site inspections and enforcement control measures, per permit Section 6.4(2)(f)?**

Answer: Yes

**How many construction site inspections were done?:** 30

**How many follow-up actions were necessary (re-inspection, enforcement actions)?:** 1

**Question: Did you develop and implement an educational program focused on erosion and sediment control for construction operators, per permit Section 6.4(2)(h)?**

Answer: Yes

**Question: Did you develop and implement a program requiring construction operators to control wastes from their sites, per permit Section 6.4(2)(i)?**

Answer: Yes

**Question: Did you implement procedures to receive and act on information submitted by the public (complaints), per permit Section 6.4(4)?**

Answer: No

Please explain why this requirement was not met:

Typically all construction site projects received input from the architects/engineers and the NAU Design Professional team. This criteria was noted as a discrepancy in the Summer 2022 MS4 inspection by ADEQ and was addressed and closed out. The future solution is to solicit input from the general public during any of the Environmental Caucus meetings that are open to Faculty, Staff, Students, and the general public each month of the Fall and Spring semesters.

**Question: Did you implement a program that includes a combination of structural and non-structural BMPs, per permit Section 6.5(1)?**

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Answer: Yes

**Question: Did you establish an ordinance or other regulatory mechanism for enforcement procedures of the Post-Construction Stormwater Management, per permit Section 6.5(2)?**

Answer: Yes

**What is the citation for the ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects?**

Internal NAU Technical Standards involving erosion and sediment/runoff controls and contractual agreements with the general contractor and subs to ensure all controls installed to specification. Before any project is accepted, all applicable Facilities Trades staff (Grounds/Landscape Services) inspect with internal FS-15 inspection forms and note any discrepancies and issue corrective action correspondence to Project Manager.

**Question: Did you implement a program to prevent or minimize impacts to water quality from stormwater runoff of new development and redevelopment sites, per permit Section 6.5(2)?**

Answer: Yes

**Question: Did you implement procedures for site plan review, per permit Section 6.5(3)?**

Answer: Yes

**Question: Did you implement an inventory of post construction site structural stormwater control measures installed within the MS4, per permit Section 6.5(4)?**

Answer: Yes

**Question: Did you implement a program to ensure the long-term operation and maintenance of post construction BMPs, per permit Section 6.5(5)?**

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Answer: No

Please explain why this requirement was not met: Inventory recorded but the inspections were not being recorded. In the wake of an MS4 inspection Summer 2022, part of the corrections involved this requirement and was sent to ADEQ and closed out. The long-term operation and maintenance starts with, at a minimum, quarterly inspections of all post-construction BMPs and if any anomalies observed, corrective action will be subsequent.

**Question: Did you implement a program to reduce or eliminate discharges of pollutants from municipal streets, facilities, yards, etc., per permit Section 6.6(1)?**

Answer: Yes

**Question: Did you implement a program to ensure the long-term operation and maintenance of stormwater BMPs, per permit Section 6.6(2)?**

Answer: Yes

**Question: Did you develop an inventory of facilities, prioritized based on their risk of discharging non-stormwater, per permit Section 6.6(2)(a)?**

Answer: Yes

**Question: Did you implement an inspection schedule for prioritized facilities, per permit Section 6.6(2)(c)?**

Answer: Yes

**Question: Did you implement an annual training program for staff that incorporates pollution prevention and good housekeeping techniques, per permit Section 6.6(2)(f)?**

Answer: Yes

**How many staff attended?:** 16

**What was the topic?:** Good housekeeping, grounds maintenance, visual assessment of anomalies in storm collection drains and culverts.



**Question: Did you develop maintenance activities, schedules and long-term inspections to reduce floatables, trash and other pollutants from the MS4, per permit Section 6.6(2)(g)?**

Answer: Yes

**Question: Does the MS4 discharge to a not-attaining water, impaired water, or an Outstanding Arizona Water (OAW)?**

Answer: Yes

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# CERTIFICATION OF SUBMISSION

## JAMES BIDDLE

You validated your identity by answering your personal security question and password on myDEQ at **04:35 PM** on **09/19/2022**. At this time, you certified the summary information above by checking that you agreed to the following statement:

### **Pursuant to A.R.S. § 41-1030:**

(1) ADEQ shall not base a licensing decision, in whole or in part, on a requirement or condition not specifically authorized by statute or rule. General authority in a statute does not authorize a requirement or condition unless a rule is made pursuant to it that specifically authorizes the requirement or condition.

(2) Prohibited licensing decisions may be challenged in a private civil action. Relief may be awarded to the prevailing party against ADEQ, including reasonable attorney fees, damages, and all fees associated with the license application.

(3) ADEQ employees may not intentionally or knowingly violate the requirement for specific licensing authority. Violation is cause for disciplinary action or dismissal, pursuant to ADEQ's adopted personnel policy. ADEQ employees are still afforded the immunity in A.R.S. §§ 12-821.01 and 12-820.02.

### **Certify your submission:**

By checking this box I certify under penalty of law that this submittal was prepared by me, or under my direction or supervision of personnel appropriately qualified to properly gather and evaluate the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I understand that all information submitted to ADEQ is public record unless otherwise identified by law as confidential. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

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