

Notice of Intent (NOI) for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4's) Under NPDES General Permit No. PRR040000

This NOI is submitted pursuant to the provisions of 40 CFR 122.21(f) and Part 2 of the NPDES General Permit No. PRR040000 for Small Municipal Separate Storm Sewer Systems (MS4) by the following applicant:

The University of Puerto Rico, Ponce Campus ("UPR-Ponce") is a State entity and operates a municipal separate storm sewer system located in the Municipality of Ponce, Puerto Rico.

2 Facility Operator Information:

Name of Operator: University of Puerto Rico Ponce Campus

Name and Title of Responsible Official: Isaac Colón Degró, Dean of Administration

Mailing Address: P. O. Box 7186 Ponce, PR 00732

Telephone Number: (787) 844-8181 Ex. 2600

3. Standard Industrial Classification (SIC) Code: 8221

4 Names and titles of primary administrative and/or technical staff contacts:

a) Name: Isaac Colón Degró Title: Dean of Administration

b) Name: Francisco Hernández Pérez Title: Ocupational Health, Safety and Environmental Specialist

5 List of Environmental Permits:

a) Resource Conservation And Recovery Act (RCRA)

(X) Permit Number: PRD 000694281

b) Biomedical ID number

(X) Permit Number: DBR 58-92-9-1

6. A topographic map (or map of storm sewer system) extending one mile beyond the property boundaries and indicating the following: (See attached map)
 - a) Facility intake and outfall structures (Intakes are located throughout the complete facility. Specific location of intakes will be identified in the facility SWMP).
 - b) Location of all Waters of the United States that receive discharges from outfalls (indication of whether any of the receiving waters are on the CWA §303(d) list of impaired waters).
 - c) Facility hazardous waste treatment, storage, or disposal facilities
 - d) Wells where fluids from the facility are injected underground (n/a)
 - e) Drinking water wells listed in public records or otherwise known in the map area. The attached map includes all groundwater wells identified within a one mile radius of the site in the USGS database. No information regarding the use of the wells is provided in the USGS database since after 9/11 the description of groundwater wells for drinking water purposes was eliminated from the database.

- 7 Description of MS4 (including location in terms of latitude and longitude of the approximate center of the MS4).

The UPR-Ponce MS4 has three (3) sections. Section 1 has two(2) intakes of 2' X 12' and nine (9) intakes of 2' X 4'. Section 2 has four (4) intakes of 2' X 4'. Section 3 has two (2) intakes of 2' X 12' and six (6) intakes of 2' X 4'. The pipeline is made of concrete with a diameter that goes from 4" up to 42". The approximate center of the MS4 is located at Lat 17° 59' 42" and Long. 65° 36' 25".

8. Estimate of square miles served by the MS4: 0.088 m² (58.6 cuerdas)

9. Description of Best Management Practices to be implemented by applicant for each of the following six storm water minimum control measures in 40 CFR 122.34(b)(1).

Next is a description of the preliminary best management practices (BMPs) that the UPR-Ponce is planning to undertake to meet the requirements of the permit. We note however, that the enclosed preliminary list may be modified during the preparation of the Storm Water Management Program (SWMP) for the facility.

a) **Public Education and Outreach on Storm Water Impacts**

The UPR-Ponce is planning to implement a public education program that would include the distribution of educational materials within the academic community regarding the potential impacts of storm water discharges on water bodies. It would also include the measures that the academic community may take to reduce pollutants in storm water. The program may include the preparation and distribution of written materials as well as the coordination of public meetings where experts on the subject talk about these issues.

b) **Public Involvement/Participation**

The UPR-Ponce is planning to implement a campus wide public involvement and participation program. Each of the departments in the university would be involved in this effort and public participation meetings are planned to obtain input from the academic community. At the department level a person responsible for the program would be identified and working sessions would be coordinated to assure the participation of the academic community. The working sessions would include information regarding the potential hazards associated with illegal discharges to the storm water system and the improper disposal of wastes.

BMPs that may be further evaluated as part of the SWMP development may include

- ◆ Development of a reforestation program
- ◆ Identification and marking of storm drains
- ◆ Clean-up and monitoring of the surface water bodies within the campus
- ◆ Development of a voluntary stream monitoring program implemented by the academic community

c) **Illicit Discharge Detection and Elimination**

To meet the requirements of this measure the UPR-Ponce is planning to develop a map of the facility storm sewer system showing the location of all outfalls, inflows, manholes, and waters of the United States that receive discharges from the outfalls. The university is planning to implement a

program for the detection of possible illegal non-storm water discharges into the system. The program may include visual assessments, connectivity testing, dye testing and/or smoke tests. Based upon the results of the tests a plan to address any identified illegal discharges will be prepared and included in the SWMP. Allowable discharges, as included in Section 1.4 of the permit, will be addressed as part of this control measure only if the University identifies them as significant contributors of pollutants to the small MS4.

As part of the SWMP development the UPR-Ponce will list occasional incidental non storm water discharges that will not be addressed as illicit discharges such as non-commercial or charity car washes. A prohibition of any non-storm water discharge that it is determined to be contributing significant amounts of pollutants to the MS4 would be included in the SWMP.

d) **Construction Site Storm Water Runoff Control**

The UPR-Ponce is planning to develop, implement and enforce a program to reduce pollutants in any storm water runoff to their MS4 from construction activities. For construction activities covering one acre or more of land or covering less than one acre that are part of a larger common plan, the university will require that the construction activity be implemented in accordance to the NPDES General Permit for Storm Water Discharges from Construction Activities issued by the EPA in July 1, 2003.

To ensure that this requirement is met the UPR-Ponce will develop an administrative procedure or guideline to assure that the requirement for the request of compliance with the NPDES General Permit for construction activities is met. The UPR-Ponce is not planning to request any requirement for construction activities covering less than one acre.

By implementing the requirement of meeting the conditions of the Construction Activities General Permit the university will assure that adequate erosion and sedimentation controls are implemented and inspected during the project construction phase.

e) **Post-Construction Storm Water Management in New Development and Redevelopment**

The UPR-Ponce is planning to develop a post construction runoff control management program for areas within the university that would undergo new development or redevelopment. The program would be aimed to reducing pollutants in post construction runoff from these areas. BMPs that may be considered during the development of the SWMP would include:

- ◆ Development of administrative procedures that would require the implementation of post-construction runoff control measures
- ◆ Development of administrative procedures or guidelines to ensure the inspection and maintenance of the runoff control measures
- ◆ Development of administrative procedures or guidelines to ensure that new development or redevelopment plans are reviewed and verified for the inclusion of post-construction runoff control measures
- ◆ Development of administrative procedures or guidelines to ensure that one or more of the following general BMPs are included in the design plans of any new or redeveloped project: innovative BMPs, infiltration systems, filtration systems or retention/detention ponds

f) Pollution Prevention/Good Housekeeping

The UPR-Ponce is planning to develop and implement a pollution prevention/good housekeeping program to minimize or to reduce potential pollutants from reaching the storm sewer system. The program would consist of the following elements:

- ◆ Employee training – employees with the responsibility of managing any waste or chemical materials within the university would be trained in the implementation of pollution prevention and good house keeping practices.
- ◆ Field inspections – A field inspection program would be developed to monitor, on a regular basis, the storm water sewer system as well as area where potential pollutants may be discharged into the system.
- ◆ The UPR-Ponce has already implemented and will continue to implement BMPs for the management of petroleum products and other chemicals including the provision of spill containment systems and the storage of chemical materials on protected roofed sheds or buildings.
- ◆ Spill response and prevention – The UPR-Ponce will develop spill prevention control and countermeasure plans for areas where oil materials are stored, as required by 40 CFR 112.

10. Descriptions of the measurable goals for each BMP, including (as appropriate) the months and years in which the action will be taken, including interim milestones and the frequency of the action

It is expected that the SWMP, describing in detail the BMPs to be implemented for each of the six storm water control measures described in 40 CFR, will be submitted to the EPA by August 6, 2007. Following is a preliminary schedule for each control measure:

<u>Control Measure</u>	<u>Expected Start Date</u>	<u>Expected Completion Date</u>
Public Education and Outreach on Storm Water Impacts	February 5, 2007	February 5, 2009
Public Involvement/Participation	February 5, 2008	February 5, 2010
Illicit Discharge Detection and Elimination	July 2007	November 6, 2011
Construction Site Storm Water Runoff Control	February 5, 2007	February 5, 2008
Post-Construction Storm Water Management in New Development and Redevelopment	July 2007	July 2009
Pollution Prevention/ Good House Keeping	July 2007	November 6, 2011

11. The person responsible for implementing or coordinating the applicant's storm water management program:

Name: Isaac Colón Degró Title: Dean of Administration

12. The applicant certifies that it has met eligibility criteria for protection of threatened or endangered species, critical habitat, historic properties, and marine fisheries pursuant to Parts 1.3.5 and 1.3.6 of the NPDES General Permit No. PRR040000.

13. Certification

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

Name: Jaime C. Marrero Vázquez

Title: Chancellor

Signature: 

Date: February 5, 2007