Storm Water Management Plan

For:

Veterans Affairs Salt Lake City Health Care System
500 South Foothill Drive
Salt Lake City, UT 84148
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SECTION 1: INTRODUCTION

1.1 Background
The Veterans Affairs Salt Lake City Health Care System (VASLCHCS) is covered by the Utah Pollutant Discharge Elimination System (UPDES) General Permit No. UTR090000 (Appendix A). This permit authorizes storm water discharges to Waters of the State of Utah resulting from a Small Municipal Separate Storm Sewer System (Small MS4). This permit became effective 1 March 2016 and shall expire at midnight, 28 Feb 2021. The VASLCHCS filed a Notice of Intent (NOI) for coverage under the UPDES General Permit No. UTR090000 (Appendix B). As a result of the NOI, the VASLCHCS was issued UPDES Permit No. UTR090025.

This Storm Water Management Plan (SWMP) is designed to limit the discharge of pollutants to the VASLCHCS’s storm water system to the maximum extent practicable. This plan consists of various best management practices (BMPs) to achieve the goals outlined in the Federal Clean Water Act and State of Utah Storm Water Regulations. The SWMP addresses the six minimum control measures set forth by the EPA through the Utah Division of Water Quality. A separate section is dedicated to each control measure listed below, outlining BMPs describing specific activities, procedures, training and other actions to prevent and reduce pollution.

- Public Education and Outreach
- Public Involvement/Participation
- Illicit Discharge Detection and Elimination
- Construction Site Storm Water Runoff Control
- Post Construction Storm Water Management in New Development and Redevelopment
- Pollution Prevention/Good Housekeeping for Municipal Operations

1.2 Facility Description
The VASLCHCS is located at 500 Foothill Drive, Salt Lake City, Utah, 84148. The campus consists of an 83-acre property with approximately 30 buildings situated on the eastern bench of the Salt Lake Valley (Appendix C). Much of the area north of the VASLCHCS is occupied by the University of Utah Campus and to the east is Research Park. To the south, the campus is bound by a student housing complex for the University and by Sunnyside Park. To the west sits the Salt Lake City Sports Complex and Steiner Aquatics Center. Red Butte Creek runs through and along some of the southerly campus boundary flowing southwesterly to Liberty Park.

1.3 Discharge Points
Storm water on the VASLCHCS campus is collected in storm drain inlets and conveyed through a vast network of storm drain pipes. The majority of the storm water is conveyed through pipes to a detention basin located in the southwest corner of the campus. Discharge from this detention basin is piped to Red Butte Creek and is shown on the MS4 Map (Appendix D) as Outfall 4. Additionally, three small outfalls discharge into Red Butte Creek upstream of the primary
discharge. These outfalls are labeled Outfall #1 through Outfall #3. It should be noted Outfall #3 has been modified with a waterman’s gate to direct the flow from Outfall #3 to the detention basin and ultimately to Outfall #4. Further, three small drainage areas discharge into the City’s storm drainage system located in Foothill Blvd.

1.4 Water Quality Concerns & Priorities
The majority of the storm water flowing from the VASLCHCS Campus drains into Red Butte Creek. As mentioned below, Red Butte Creek is currently listed as impaired. Like many other MS4s along the Wasatch Front, some of the biggest water quality concerns involve sediment loads from disturbed areas; fertilizers and pesticides from landscaping areas; and oil and grease from roadway and parking areas.

1.5 Impaired Waterbodies
When pollutants impair the use of water, a study called a Total Maximum Daily Load (TMDL) is required to determine the pollutants and how to restore the water quality. When a waterbody fails to meet minimum water quality standards, Section 303(d) of the Clean Water Act requires the waterbody be included on an impaired list. According to the State of Utah’s 303(d) list, found at http://www.deq.utah.gov/ProgramsServices/programs/water/wqmanagement/assessment/docs/2014/10Oct/Chapter5303DList.pdf, Red Butte Creek is currently an impaired body for OE Bioassessment from 1100 East Street to Red Butte Reservoir. An OE Bioassessment is a comparison of the observed species (O) at a site to the expected species (E) based on reference sites. This impaired section runs through the VA property. This ratio gives an indicator of overall health of the waterbody. While Red Butte Creek is listed as an impaired waterbody, this SWMP does not address any additional pollutants of concern which may be associated with the waterbody. This section of Red Butte Creek has not entered in the TMDL development process so no pollutants or limits have been identified. It was first included on the 303(d) list in the 2014 Integrated Report.

1.6 Threatened or Endangered Species and Historic Properties
The VASLCHCS completed an Environmental Assessment for a Proposed Installation and Operation of Photo Voltaic Solar Systems which was published in May 2010. Included in this Assessment is the following statement: “The site was determined not to be eligible for the historic registry. There is no presence of endangered species, archeological remains, or other protected resources...” In 2014 and 2015, Local Historic Districts were designated in the Yalecrest Neighborhood. These neighborhoods are located just south of the VASLCHCS campus in the direction of Red Butte Creek’s flows. It is not anticipated any storm water related activities on the VASLCHCS campus would have any impact on the historic nature of these neighborhoods.

1.7 Non-storm water discharges
A complete list of non-storm water discharges which do not need to be addressed can be found in Appendix A at section 1.2.2.2. This list is valid unless the Executive Secretary identifies any of them as significant sources of pollutants to the Waters of the State or as causing or contributing to
a violation of water quality standards.

1.8 Roles and Responsibilities

Medical Center Director has overall responsibility for compliance with the storm water regulations and the implementation of this policy.

Director of Engineering Service will be responsible for:
(1) Maintaining drawings of the locations of catch basins and storm sewer routes.
(2) Sampling of storm water and performing analysis if an illicit discharge is detected.
(3) Provide input to annual report.
(4) Communicate requirements to lease holders.

GEMS Manager will be responsible for:
(1) Maintaining historical data related to previous spills.
(2) Preparing annual report for submission to UDEQ.
SECTION 2: PUBLIC EDUCATION AND OUTREACH

2.1 Public Education Program
Because the VASLCHCS is a facility rather than a municipality, the target audience for public education and outreach is more limited in scope. For the purposes of this program, the public will include the staff, patients, visitors, contractors, and vendors. The Public Education Program (PEP) has been developed to promote, publicize, and facilitate education for the purpose of encouraging the public to reduce the introduction of pollutants into storm water. The Safety Office, Environmental Manager [GEMS] is responsible to implement and maintain the PEP for the VASLCHCS campus.

2.2 Pollutants and Pollutant Sources
Below is a list of pollutants and pollutant sources identified as impacting, or having the potential to impact, the beneficial use of Red Butte Creek. Outreach materials prepared as part of the PEP will describe the impact of these specific pollutants, how to avoid, minimize or eliminate their impacts, and the actions individuals can take to improve water quality.

<table>
<thead>
<tr>
<th>Possible Pollutants</th>
<th>Possible Pollutant Sources</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pesticides, herbicides, fungicides, and fertilizer</td>
<td>Fuel storage tanks</td>
</tr>
<tr>
<td>Cleaning Chemicals</td>
<td>Used oil storage tank</td>
</tr>
<tr>
<td>Asphalt and Concrete</td>
<td>Maintenance buildings</td>
</tr>
<tr>
<td>Salt and deicing chemicals</td>
<td>Maintenance yards</td>
</tr>
<tr>
<td>Sediment</td>
<td>Material storage areas</td>
</tr>
<tr>
<td>Landscaping Debris</td>
<td>Hazardous material storage and transfer areas</td>
</tr>
<tr>
<td>Litter and trash</td>
<td>Parking lot and road maintenance</td>
</tr>
<tr>
<td>Paint, glue and adhesives</td>
<td>Landscape maintenance</td>
</tr>
<tr>
<td>Gasoline and diesel fuel</td>
<td>Waste storage and transfer areas</td>
</tr>
<tr>
<td>Hydraulic oil and lubricants</td>
<td>Construction projects</td>
</tr>
<tr>
<td>Biohazards</td>
<td>Cross contamination with sanitary sewer</td>
</tr>
<tr>
<td>Lab Chemicals</td>
<td>Swimming Pool Water</td>
</tr>
<tr>
<td>Boiler, cooling tower, and other building system chemicals</td>
<td>Building and equipment maintenance</td>
</tr>
<tr>
<td></td>
<td>Pet waste</td>
</tr>
</tbody>
</table>

2.3 Target Audiences
In addition to having a focused message, the PEP should also consider a specific audience. The target audiences for the PEP shall be thought of as the following groups: (1) the general public, (2) hired; contractors & vendors, and (3) employees. Education and outreach efforts shall be targeted and presented to these specific audiences to ensure effectiveness.
2.4 Illicit Discharges and Contractual Mechanisms

VASLCHCS’s MS4 permit requires education on illicit discharges and mechanisms for contractually requiring compliance from third parties. The PEP will include information on what illicit discharge is, how to prevent, and how to report. Articles on contract mechanisms utilized by the VASLCHCS to ensure compliance with storm water requirements such as specifications will be included in the PEP.

2.5 Goals & Actions

<table>
<thead>
<tr>
<th>Informational Articles</th>
</tr>
</thead>
<tbody>
<tr>
<td>Objective: Increase public awareness of storm water, the effects of pollutants (especially nitrogen and phosphorus) and ways to minimize the discharge of pollutants to storm drain systems.</td>
</tr>
<tr>
<td>Rationale: Storm water runoff is generated from nearly all land surfaces (pavement, yards, driveways, roofs, etc.) Efforts to control pollution in this runoff must consider individual and public behaviors and actions which generate pollution from these surfaces. Controlling these behaviors will help to control the pollution in runoff.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Actions:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Annually - distribute an informational article at Earth Day activities</td>
</tr>
<tr>
<td>• Articles maintained on SWMP website and notify of availability through the Wahlen Weekly, Facebook, and Twitter.</td>
</tr>
<tr>
<td>• Article topics to be considered: nitrogen/phosphorus usage reductions, potential impacts from storm water discharges; methods to avoid/minimize/reduce/eliminate the adverse impacts of storm water discharges; actions individuals can take to improve water quality; encouraging participation in local environmental stewardship activities; effects of outdoor activities; benefits of on-site infiltration; proper management of pet waste; building/equipment maintenance; proper use of deicing materials; material storage; waste/dumpster management; and parking lot sweeping.</td>
</tr>
<tr>
<td>• Provide links to other resources at the local, regional, and national level.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Assessment:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document the number of different handouts provided at Earth Day activities and their availability on the SWMP website. The articles should be reviewed annually for updates and new topic articles should be added.</td>
</tr>
</tbody>
</table>
**Illicit Discharge Reporting**

**Objective:** Increase public awareness of existing procedures and processes for effectively managing illicit discharges.

**Rationale:** Illicit discharges can be obvious and easily identified by the public. Having a process for reporting these discharges can greatly improve response time and reduce the impacts associated with the discharge.

**Actions:**
- Annually - Include handouts with the illicit discharge phone number at group events, in-service and training sessions.
- Include the illicit discharge phone number as part of all informational articles, on the SWMP website, through the Wahlen Weekly, and social media. Provide links to other resources at the local, regional, and national level.
- Publish and advertise articles on what illicit discharges are, how to prevent, and how to report.

**Assessment:** Document the number of handouts given at group events and its inclusion in articles, the SWMP website, in the Wahlen Weekly, and social media on an annual basis. Additionally, keep a written record of all calls received; follow up actions taken, and any feedback received regarding the public education process.

**Existing Contracts & Specifications**

**Objective:** Increase public awareness of existing contracts and specifications available to effectively manage contractors and vendors as their activities relate to storm water quality.

**Rationale:** The VASLCHCS already has numerous tools at their disposal to manage the activities of contractors and vendors working on the campus. Many of these tools include provisions which could positively affect the operations on campus and reduce the introduction of pollutants into storm water runoff.

**Actions:**
- Publish and advertise articles on contractual mechanisms utilized to ensure third party compliance with storm water requirements.
- Annually - Include handouts contract articles at group events.

**Assessment:** Document the number of handouts given at group events and its inclusion in articles, the SWMP website, in the Wahlen Weekly, and social media on an annual basis.
SECTION 3: PUBLIC INVOLVEMENT AND PARTICIPATION

3.1 Public Involvement
The public can provide valuable input and assistance to the VASLCHCS in the implementation and updating of this SWMP. An active and involved community will increase the success of this program by increasing the support for the program and will be less likely to challenge it. With this support, the program will most likely be able to be implemented quickly and more efficiently. Additionally, as the support and involvement in the program increases, the knowledge and resource base will expand. This could lead to relationships with other similarly focused community programs.

The purpose of this Public Involvement and Participation (PIP) process is to encourage public input in all aspects of the SWMP. The public will include the staff, clients, visitors, contractors, and vendors.

3.2 Goals & Actions

<table>
<thead>
<tr>
<th>Public Notices</th>
</tr>
</thead>
<tbody>
<tr>
<td>Objective: Provide the public an opportunity to be involved and participate in VASLCHCS programs related to storm water quality. Ultimately resulting in the reduction of pollution to storm water runoff.</td>
</tr>
<tr>
<td>Rationale:</td>
</tr>
</tbody>
</table>
| Actions: | • Annually - publish flyer at group events, in Whalen Weekly, and on Facebook and Twitter introducing the SWMP and requesting public involvement in the annual updates.  
| | • Annually – publish an article in the Whalen Weekly and on social media discussing the SWMP, its importance, and requesting public comment for the annual update.  
| | • SWMP will be housed on a publicly available website at all times.  
| | • Comments will be collected year round and used in support of the annual update.  
| | • Maintain record of all public comments and inquiries received. |
| Assessment: | Document and verify the flyer and article publishing dates. Annually review the flyer/article and publishing methods to increase public response as required. Document all SWMP comments received in Appendix E. |

In the event the above described goals and actions are found to be ineffective, or if it is determined additional public involvement is required, additional actions may be required. Below is a list of additional opportunities which may be available or created:

- Create an adopt-a-creek type program, allowing volunteers to be involved with the cleanup of Red Butte Creek.
• Collaborate with Salt Lake County and/or Salt Lake City.
• Conduct surveys with the public or create contests which generate public comment and feedback.
SECTION 4: ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE)

4.1 IDDE Program
The existing policy of the VASLCHCS is to eliminate any illicit discharges and illicit connections. Storm water on the VASLCHCS campus is collected in storm drain inlets and conveyed through a vast network of storm drain pipes. The majority of the storm water is conveyed through pipes to a detention basin located in the southwest corner of the campus. Discharge from this detention basin is piped to Red Butte Creek and is shown on the MS4 Map (Appendix D) as Outfall 4. In addition to this discharge point, two additional smaller outfalls discharge into Red Butte Creek upstream. These outfalls are labeled Outfall #1 and Outfall #2. The connections to the Salt Lake City storm water system are shown on the MS4 Map.

This Illicit Discharge Detection and Elimination (IDDE) program has been created to develop, implement, and enforce a program to prohibit and effectively eliminate illicit discharges to the VASLCHCS MS4. The MS4 map will be used for prioritizing inspection, maximizing efficiency for investigating non-storm water discharges, guiding spill response, and assisting with maintenance efforts. The map identifies the location of each known outfall, storm drainage piping, connections to the Salt Lake City storm water system, and the location of Red Butte Creek.

Currently, the VASLCHCS is not aware of any illicit connections on campus. Changes to the facility drainage system are not anticipated, but if changes are made, the VASLCHCS will require contractors to verify proper connections were made through appropriate methods as determined by the VASLCHCS. In the event the VASLCHCS discovers an apparent illicit discharge/connection, an investigation will ensue to identify and correct the problem. In addition, the measures discussed below will be implemented to assure no illicit discharges/connections from the campus.

Engineering Service is the regulatory mechanism to implement and oversee the IDDE program. Through Engineering Services, the VASLCHCS will be able to prohibit, effectively eliminate, or require the removal of non-storm water discharges into the VASLCHCS MS4. These discharges will include spills, illicit connections, illegal dumping and sanitary sewer overflows into the storm drainage system. The IDDE program will be enforced through the standard procedures of the Engineering Service which includes a variety of enforcement options as well as escalating enforcement procedures as described in any applicable contracting documents.

4.2 Detection
As part of this IDDE program the VASLCHCS will utilize the quarterly storm water flows to detect and eliminate non-storm water discharges to the MS4. The staff are trained on the detection of spills, illicit connections, sanitary sewer overflows and illegal dumping. The VASLCHCS has already identified and verified each of the outfall locations on Red Butte Creek. All outfalls undergo a dry weather screening annually. The quarterly and annual inspections are captured on
inspection forms. The completed forms are added to Appendix E after each inspection. In addition, the VASLCHCS will continue to utilize the illicit discharge phone number as discussed in the Public Education and Outreach section of this document.

4.3 Tracing, Characterizing & Eliminating

As part of the IDDE program, the VASLCHCS follows the standard operating procedure below on how to follow and trace the source of an illicit discharge, characterize the nature of and potential threat of the illicit discharge, and effectively cease the illicit discharge.

Tracing the source of an illicit discharge may include visual inspections, opening manholes, utilizing subsurface cameras, field tests to identify chemical sources, and analyzing water samples. The primary goal of tracing the illicit discharge source is to eliminate the source and the secondary goal will be to identify the responsible party. After identifying the responsible party, penalties or other procedures shall be utilized, as necessary, to prevent further discharges.

In addition to tracing the source of an illicit discharge, the standard operating procedure includes provisions to characterize the nature of, and potential public or environmental threat posed by an illicit discharge. This characterization includes instructions for evaluating how the discharge will be immediately contained and the steps to be taken to contain the discharge. The procedures in the VASLCHCS Spill Prevention, Control, and Countermeasure Plan (SPCC) will be followed once the source is identified. A copy of the SPCC Plan is included in Appendix F. An investigation shall be initiated immediately upon becoming aware of the discharge.

The appropriate authorities will be notified of any illicit discharges in accordance with the SPCC. In the event the discharge is not immediately eliminated, follow up inspections and escalating enforcement actions shall be utilized. Analytical monitoring may be necessary to identify the source of the discharge. All IDDE investigations shall be documented on an inspection report. Completed inspections reports shall be filed in Appendix E. The inspection report shall document the following:

- the date the discharge was reported;
- the date the investigation began;
- the date the discharge was observed;
- the location; a description of the discharge;
- how the discharge was discovered, removed or repaired;
- the decision whether or not to utilize analytical monitoring; and
- how the removal was verified.

4.4 Training

At a minimum, annual IDDE program training shall be required for employees. New hires shall be trained immediately and prior to the start of duties which could impact storm water discharges. The training should include identification, investigation, termination, cleanup and reporting illicit
discharges. Types of discharges include spills, improper disposal, and illicit connections. The training shall be provided to all field staff who may encounter an illicit discharge during their normal job responsibilities. The training shall also be provided to any office staff who may receive reports of illicit discharges (e.g. receptionists, phone operators).

### 4.5 Household Hazardous Waste

To comply with the requirement to promote or provide services for the collection of household hazardous waste, VASLCHCS will engage with local cities and counties regarding their programs. When the dates for city and county collection events are made available, information on the dates, times, locations, and links for additional information will be included in the Wahlen Weekly, the SWMP website, and on social media.

### 4.6 Goals & Actions

#### Field Assessment

<table>
<thead>
<tr>
<th>Objective:</th>
<th>Include regular screening of all outfalls.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Rationale:</strong></td>
<td>Illicit discharges have the potential to contribute significant pollutants to receiving waters. The detection and elimination of illicit discharges is important to protect and restore these receiving waters.</td>
</tr>
</tbody>
</table>
| **Actions:** | • Quarterly – conduct a visual inspection of storm water flows at all outfalls.  
• Annually – conduct dry weather screening of all outfalls.  
• Complete the inspection form to document inspection and findings. |
| **Assessment:** | Document the results of each inspection and include inspection form in SWMP Appendix E. Maintain a database for mapping, tracking number/type of spills/illicit discharges identified, and inspections conducted. |

#### IDDE Training

<table>
<thead>
<tr>
<th>Objective:</th>
<th>Provide annual IDDE program training for employees</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Rationale:</strong></td>
<td>Illicit discharges have the potential to contribute significant pollutants to receiving waters. The detection and elimination of illicit discharges is important to protect and restore these receiving waters.</td>
</tr>
</tbody>
</table>
| **Actions:** | • Annually – provide training for all field staff who may encounter an illicit discharge during their normal job responsibilities and any office staff who may receive reports of illicit discharges.  
• New hires – provide training prior to beginning performance of duties which could observe illicit discharges. |
<p>| <strong>Assessment:</strong> | Document time, location and attendance list for each training session. Request feedback regarding the training session from each attendee and solicit topics for future training sessions. |</p>
<table>
<thead>
<tr>
<th><strong>Household Hazardous Waste</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Objective:</strong> Promote the collection of household hazardous waste</td>
</tr>
<tr>
<td><strong>Rationale:</strong> Household hazardous wastes have the potential to contribute significant pollutants to receiving waters. Proper disposal is important to protect and restore these receiving waters.</td>
</tr>
<tr>
<td><strong>Actions:</strong></td>
</tr>
<tr>
<td>• Engage with city and county governments and support their collection events.</td>
</tr>
<tr>
<td>• Advertise collection events in surrounding communities in the Wahlen Weekly, on the SWMP website, and on Facebook/Twitter.</td>
</tr>
<tr>
<td><strong>Assessment:</strong> Document each event and where/when advertisements were published.</td>
</tr>
</tbody>
</table>
SECTION 5: CONSTRUCTION SITE STORM WATER RUNOFF CONTROL

5.1 **Storm Water Pollution Prevention Plan**
The VASLCHCS utilizes the following documents to implement and enforce their efforts to reduce pollutants in storm water runoff from construction sites:

1. Storm Water Pollution Prevention Plan
2. Construction Safety and Oversight Committee, Policy Memo 138.66
3. VASLCHCS Section 018210 Storm Water Design Specification
4. VASLCHCS Section 018200 Storm Water Construction Specification

The VASLCHCS's goal is to manage all construction activities to minimize the potential impact of any storm water discharges from these activities. Locally developed specifications detail procedures for protection of environmental resources as well as the quality and quantity of storm water from design and construction activities. Construction projects are required to obtain authorization to discharge storm water under the UPDES Storm Water General Permit for Construction Activities, UTR300000.

The VASLCHCS applies these regulations to all construction projects disturbing an area equal to or greater than one acre and to projects smaller than one acre if they are part of a larger common plan of development. Additionally, projects not meeting these requirements are evaluated during the National Environmental Policy Act (NEPA) process in terms of potential impact to sensitive areas and potential pollutant sources. Priority construction sites are usually located adjacent to or discharge directly to Red Butte Creek. As required, the VASLCHCS applies the regulations to these smaller projects. The following factors will be included in the determination of a priority construction site:

- Soil erosion potential
- Site slope
- Project size and type
- Sensitivity to receiving waterbodies
- Proximity to receiving waterbodies
- Non-storm water discharges and past record of non-compliance by the operators of the construction site

For projects meeting the criteria above, the VASLCHCS requires a project specific Storm Water Pollution Prevention Plan (SWPPP) be prepared, implemented, and inspected in accordance with the requirements set forth in the UPDES Storm Water General Permit for Construction Activities, UTR300000. As the project owner for all construction projects on the campus, the VASLCHCS has the authority to access the project site with qualified personnel to inspect and verify the requirements are being met.
In addition to the programs and requirements mentioned above, the GEMS Program further regulates new construction on the Campus. Section 438 of the Energy Independence and Security Act (EISA), requires the sponsor of any development or redevelopment project involving a Federal facility with a footprint exceeding 5,000 square feet shall use site planning, design, construction, and maintenance strategies for the property to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of the property with regard to the temperature, rate, volume, and duration of flow. For each new project proposed on the VASLCHCS campus, the design team will include a competent professional to ensure these requirements are met. Opportunities for Low Impact Design (LID) will be evaluated and encouraged.

5.2 Review & Inspection
The VASLCHCS requires the SWPPP to be submitted and approved prior to beginning construction as part of the contract documents. The records of these reviews will be available for a period of 5 years. The pre-construction review procedure will include the following:

- Review of site design, planned operations at the construction site, planned construction Best Management Practices (BMPs), and proposed post-construction BMPs.
- The NEPA process includes consideration of the potential water quality impacts.
- Evaluation of low impact design and green infrastructure.
- Identification of priority construction sites (i.e. near Red Butte Creek).

After the project is underway, the responsible VASLCHCS Project Manager will verify the provisions of the SWPPP are implemented, followed, and maintained. To fully complete this task, the VASLCHCS Project Manager will follow existing contract provisions for the inspection and enforcement of SWPPPs at construction sites. The inspection procedure will include the following:

- Monthly or bi-weekly inspections conducted on all sites requiring a SWPPP as defined above and will be documented utilizing the forms in Appendix G. The forms are prescribed by UDEQ on their website at http://www.deq.utah.gov/Permits/water/updes/stormwatercon.htm
- Inspections will be conducted during all phases of construction: before land disturbance, during construction activities, and following active construction.
- Based on inspection findings, all follow up actions will be performed (e.g. re-inspection, enforcement action) and documented in the project record.
- Notification and verification procedures for determining final stabilization and authorizing removal of temporary measures.

5.3 Training & Recordkeeping
The VASLCHCS will provide all Project Managers, Inspectors, and Contracting Officer’s Representatives training opportunities at least annually related to SWPPP review, implementation, and inspection. New hires shall be trained immediately and prior to the start of duties. Records of each training session will include: date, attendees’ names/position, and topics discussed and will be retained for 5 years. The VASLCHCS will provide and document information and training
given to MS4 engineers, development and plan review staff, land use planners, and other parties as applicable to learn about Low Impact Development (LID) practices, green infrastructure practices, and to communicate the specific requirements for post-construction control and the associated BMPs.

In addition to the training records, the VASLCHCS will maintain records of all projects requiring a SWPPP. The records will include site plan reviews, copies of the SWPPPs, inspection reports, and enforcement actions. All records for these projects will be kept for a minimum of five years. The records will be kept in the project files and a log of projects requiring a SWPPP will be kept in Appendix G of the SWMP.

### 5.4 Goals & Actions

<table>
<thead>
<tr>
<th>SWPPP</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Objective:</strong> Ensure projects, as required, have an approved, compliant SWPPP prior to beginning ground disturbance activities.</td>
<td></td>
</tr>
<tr>
<td><strong>Rationale:</strong> Construction site runoff has the potential to contribute significant pollutants to receiving waters. Proper construction site management is important to protect these receiving waters.</td>
<td></td>
</tr>
<tr>
<td><strong>Actions:</strong></td>
<td></td>
</tr>
<tr>
<td>• Storm water design and construction specifications shall be incorporated into contracts where storm water triggers are met.</td>
<td></td>
</tr>
<tr>
<td>• Inspections will be held bi-weekly or monthly, as required.</td>
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</tr>
<tr>
<td>• Annually – review storm water specifications to determine their effectiveness and update as necessary.</td>
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</tr>
<tr>
<td><strong>Assessment:</strong></td>
<td></td>
</tr>
<tr>
<td>Log each project requiring a SWPPP and verify it is followed during each construction project. Review effectiveness of the SWPPP during each construction phase of project. Revise SWPPP as site conditions change. Annually review and update accordingly.</td>
<td></td>
</tr>
</tbody>
</table>
### Staff Training

**Objective:** Train Project Managers, Inspectors, and Contracting Officer’s Representatives in storm water related duties.

**Rationale:**

Construction site runoff has the potential to contribute significant pollutants to receiving waters. Proper construction site management is important to protect these receiving waters.

**Actions:**

- Annually – provide training for Project Managers, Inspectors, and Contracting Officer’s Representatives.
- New hires – provide training prior to beginning performance of duties which could impact storm water or discharges.

**Assessment:** Document training sessions. Solicit additional training ideas and topics from trainees.
SECTION 6: POST-CONSTRUCTION STORM WATER MANAGEMENT

6.1 Long Term Storm Water Management

Engineering Service is responsible to control storm water for new and redevelopment projects after construction is complete. If a SWPPP was required, the Engineering Service responsibility begins when the Notice of Termination (NOT) is approved by the EPA and/or Utah DEQ. The VASLCHCS does not have authority to create ordinances; however, the Medical Director can issue directives. The Engineering Service is guided by documents with enforceable policies. Any development or redevelopment with a disturbed area greater than 1 acre or that is part of a larger common development, a footprint greater than 5,000 square feet or more in size, and/or development in priority areas will be guided by the following documents:

1. Storm Water Pollution Prevention Plan
2. Construction Safety and Oversight Committee, Policy Memo 138.66
3. Section 438 of the Energy Independence and Security Act (EISA)

Section 438 of the Energy Independence and Security Act (EISA) requires the sponsor of any development or redevelopment project involving a Federal facility with a footprint exceeding 5,000 square feet to use site planning, design, construction, and maintenance strategies for the property to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of the property with regard to the temperature, rate, volume, and duration of flow.

The objective of this section is to control the hydrology associated with new construction and redevelopment to levels equal to the site prior to development. For the most part, the EISA Section 438 requirements will be more stringent than the requirements found in Utah Pollutant Discharge Elimination System (UPDES) General Permit No. UTR090000 (Appendix A). The requirements found in the UPDES General Permit will also be met as part of complying with EISA.

The requirements of EISA Section 438 were created based on a performance-based approach in lieu of a prescriptive requirement in order to provide site designers maximum flexibility in selecting control practices appropriate for the site. Each project will be evaluated individually to determine the BMPs best suited to the project and site. The enforcement and implementation of these requirements will be conducted by the VASLCHCS Project Manager and Contracting Officer assigned to a specific project.

6.2 Design Criteria

Site designers have two options to comply with Section 438. Situations may occur where Option 1 (retaining the 95th percentile rainfall event) is not protective enough to maintain or restore the predevelopment hydrology of the project (for example, in some headwater streams). In these cases, Option 2 (site-specific hydrologic analysis) could be used to determine the types of storm water practices necessary to preserve predevelopment runoff conditions. Option 2 could also be used if
predevelopment runoff conditions can be maintained by retaining less than the 95th percentile rainfall event. “Technical Guidance on Implementing the Stormwater Runoff Requirements for Federal Projects under Section 438 of the Energy Independence and Security Act” (Appendix H) is provided as part of this SWMP to describe the design criteria. If Option 2 is selected, the MS4 permit requires management on-site of storm water from less than or equal to a 90th percentile event.

### 6.3 Inspection & Recordkeeping

In addition to requiring compliance with the requirements of EISA Section 438, the VASLCHCS will conduct a site plan review along with a review of the SWPPP prior to beginning construction; the records of these reviews retained for at least 5 years. The pre-construction review procedure will include the following:

- Review of site design, planned operations at the construction site, planned construction BMPs, and proposed post-construction BMPs
- The NEPA process includes consideration of the potential water quality impacts
- Evaluation of low impact design and green infrastructure opportunities
- Identification of priority construction sites (i.e. near Red Butte Creek)
- Include non-structural BMPs
- How long-term BMPs were selected
- Pollutant removal expected from BMPs
- Technical basis to support BMP performance claims

The VASLCHCS will verify the provisions of the design are implemented, followed, and maintained. To fully complete this task, the VASLCHCS will utilize storm water specifications for the inspection and enforcement of project design criteria at construction sites. The assigned Project Manager is responsible for the inspections. The Contracting Officer will have enforcement authority. The permanent BMP inspection procedure will include the following:

- Inspections will be conducted to ensure adequate maintenance is being performed.
- Inspections will be conducted at least once during construction activities.
- Inspections and required maintenance will be conducted annually.
- Inspections will be completed with an inspection report including the following information:
  - Inspection date
  - Name and signature of inspector
  - Name and signature of responsible VA Project Manager
  - Project Location
  - A description of the condition of the storm water control measure including the quality of: vegetation and soils; inlet and outlet channels and structures; catch basins; spillways; weirs; and other control structures; and sediment and debris accumulation
  - Specific maintenance issues or violations requiring correction along with deadlines and re-inspection dates.
As part of the annual inspection, the VASLCHCS will update the inventory of all post-construction structural storm water control measures. Each entry will include the following:

- Project name and contact information for responsible Project Manager
- Project location and start/end date
- Short description of each storm water control measure (type, number, design specifications)
- Short description of maintenance requirements (frequency of recommended maintenance & inspections)
- Inspection information (date, findings, follow up activities, compliance status)

### 6.4 Retrofits
The VASLCHCS will annually evaluate existing developed sites to determine if any are adversely impacting water quality. The evaluation shall include a ranking of control measures to determine those sites best suited for retrofitting as well as those which should be considered later for retrofitting. The following will be included when developing the criteria for retrofits:

- Proximity to waterbody
- Status of waterbody to improve impaired waterbodies and protect unimpaired waterbodies
- Hydrologic condition of the receiving waterbody
- Proximity to sensitive ecosystem or protected area
- Any upcoming sites which could be further enhanced by retrofitting storm water controls

### 6.5 Training
The VASLCHCS will ensure all Engineering Services' personnel are provided training annually related to post-construction storm water management, planning & review, implementation, and inspection. New hires shall be trained immediately and prior to the start of duties. Records of each training session will be retained and include: date, attendees' names/position, and topics discussed.

In addition to the training records, the VASLCHCS will maintain records of all projects required to comply with the EISA Section 438 requirements. The records will include site plan reviews, copies of the design documents, inspection reports, and enforcement actions. All records for these projects will be kept for a minimum of five years as part of the project file. A log of these projects will be kept with SWMP in Appendix E.
### 6.6 Goals & Actions

#### Post-Construction Inspections

**Objective:** Inspection of permanent BMPs.

<table>
<thead>
<tr>
<th><strong>Rationale:</strong></th>
<th>Runoff from developed sites has the potential to contribute significant pollutants to receiving waters. Proper post-construction site management is important to protect these receiving waters.</th>
</tr>
</thead>
</table>
| **Actions:**  | • Annually – conduct inspections of permanent BMPs  
• Annually – update the inventory of permanent BMPs  
• Construction – inspect installation of permanent BMPs at least once |
| **Assessment:** | Document inspections on an inspection form. Store inspection forms and updated inventory in Appendix E. |

#### Retrofits

**Objective:** Annual review of campus to determine if retrofits are required.

<table>
<thead>
<tr>
<th><strong>Rationale:</strong></th>
<th>Runoff from developed sites has the potential to contribute significant pollutants to receiving waters. Proper post-construction site management is important to protect these receiving waters.</th>
</tr>
</thead>
</table>
| **Actions:**  | • Annually – review the campus to determine if any locations are recommended for storm water retrofit  
• Annually – rank locations identified for retrofit and program project accordingly |
| **Assessment:** | Document annual review and determinations and store in Appendix E. |

#### Staff Training

**Objective:** Provide training to all Engineering Services’ personnel.

<table>
<thead>
<tr>
<th><strong>Rationale:</strong></th>
<th>Runoff from developed sites has the potential to contribute significant pollutants to receiving waters. Proper post-construction site management is important to protect these receiving waters.</th>
</tr>
</thead>
</table>
| **Actions:**  | • Annually – provide training to Project Managers and Inspectors.  
• New hires will be trained immediately and prior to the start of any storm water related duties. |
| **Assessment:** | Document training sessions. Solicit additional training ideas and topics from Project Managers. |
SECTION 7: POLLUTION PREVENTION AND GOOD HOUSEKEEPING

7.1 Pollution Prevention and Good Housekeeping (PPGH) Program

The VASLCHCS campus contains many facilities which are potential sources of storm water pollution. The goal of the PPGH Program is to prevent and reduce pollutants from being discharged to receiving waterbodies. A cohesive PPGH program, encompassing key VASLCHCS facilities and focused on storm water pollution prevention, is captured in the SWPPP. In order to determine which facilities must be addressed, the VASLCHCS shall inventory and categorize its facilities, evaluate the inventory, and establish a priority list for facilities posing the greatest threat to water quality. The backbone of the PPGH program is the VA’s SWPPP (Appendix I). The SWPPP will be reviewed and updated to properly address and manage each high priority facility. Updates to the SWPPP may include additional BMPs for protecting water quality and reducing the discharge of pollutants.

In order to be in compliance with the EPA, the VASLCHCS’s PPGH addresses several specific requirements. The following is a list of requirements to be addressed or otherwise included based upon the facility category (see Section 7.2 for determination of facility categories.

Buildings & Facilities:
- Use, storage, and disposal of chemicals
- Employees responsible for handling chemicals shall be trained and understand the pertinent procedures.
- Include in the Spill Prevention, Control, and Countermeasure (SPPC) Plan
- Maintenance activities (painting, cleaning, washing, etc.) of dumpsters and other waste management equipment. These activities are only performed by contract and are covered in contracting documents.
- Schedules and procedures for parking lot and grounds maintenance.
- An inventory and map of all floor and storm drains located on the property.

Material Storage Areas. Heavy Equipment Storage Areas and Maintenance Areas:
- Procedures must be developed and implemented to protect water quality at each of these facilities.

Parks and Open Space:
- SOP #12 Grounds Maintenance addresses the proper application, storage, and disposal of fertilizer, pesticides, and herbicides. Include minimization of usage based upon manufacturer’s instruction. These activities are performed by contract and are covered in contracting documents.
- VASLCHCS must establish a protocol for addressing sediment and erosion control issues which may arise.
- SOP #12 Grounds Maintenance addresses lawn maintenance and landscaping activities to ensure protection of water quality (including proper disposal of lawn clippings and vegetation, use of alternate landscaping materials). This evaluation must identify whether lawn clippings are mulched, composted, or disposed of in municipal waste. Any of the previous methods of disposal must be found to be protective of water quality.
- Proper cleaning of maintenance equipment, building exterior, trash containers, and disposal of associated waste and wastewater.
- Establish sufficient number of trash containers and signage for proper disposal of pet waste.

Vehicle and Equipment:
- Drip pans and absorbents must be implemented in minimizing and eliminating water quality concerns from leaky vehicles and equipment.
- Fueling areas for VASLCHCS-owned vehicles shall be evaluated.
  - Fueling areas are under cover. The VASLCHCS will inspect and maintain fueling area(s) at regular intervals.
- Vehicle wash water is not discharged to MS4 or surface waters.

Roads and Parking Lots:
- Develop and implement procedures and schedule for sweeping streets and parking lots and any other BMPs designed to reduce the pollutant load generated from roads and parking lots.
- VASLCHCS contracts for the road and parking lot maintenance. Storm Water specifications (Appendix J) are included in contracts which details the contractor’s environmental responsibilities for activities associated with the VASLCHCS. The storm water construction specifications must be included in any contract associated with VASLCHCS roads and parking lot maintenance, including pothole repair, pavement marking, sealing, and repaving.
- Cold weather operations (including plowing, sanding, and application of deicing compounds and maintenance of snow disposal areas) must adhere to the requirements of road and parking lot maintenance. Additionally, VASLCHCS must identify areas which may be used for snow disposal. Any other areas not identified may not be used as they have not been evaluated for their potential discharge to receiving waters.
- Right-of-way maintenance (including mowing, herbicide and pesticide application). Similar to the road and parking lot maintenance, the right of way maintenance is also performed by a contractor. Appendix J covers the contractor’s environmental responsibilities for activities associated with the VASLCHCS.

Storm Water Collection and Conveyance System:
- SWMP requires regular inspection, cleaning, and repair of catch basins, storm water conveyance pipes, ditches, irrigation canals, culverts, structural runoff treatment and/or
flow control facilities. The SWMP requires BMP inspections and maintenance, pollution prevention/good housekeeping practices.

- Prioritize storm sewer system maintenance, with highest priority areas being maintained at the greatest frequency. The following items will be considered during prioritization:
  - Water quality concerns,
  - Condition of the receiving water,
  - Amount and type of material typically accumulating in an area,
  - Other location specific factors.
- All VASLCHCS-owned or operated storm water structural BMPs (including swales, impoundment basins, or other structures) must be inspected annually to ensure they are properly maintained to reduce the discharge of pollutants into receiving waters.
- Develop, ensure, and document proper disposal methods of all waste and wastewater removed from the storm water conveyance system.
- Disposal methods apply to, but are not limited to, street sweeping and catch basin cleaning.
- Materials removed should be dewatered in a contained area and discharged to the local sanitary sewer (with approval of local authorities) where feasible.
- Solid materials will be stored and disposed of properly to avoid discharge during a storm event.

Other Facilities and Operations:

- Any other facilities or operations not listed above that may discharge pollutants must be identified and addressed by the VASLCHCS. The VASLCHCS will develop, implement, and document the appropriate BMPs to protect water quality from discharges from these sites in the PPGH program.

The VASLCHCS holds all third parties contracted for maintenance to the same standards held by the VASLCHCS. The VASLCHCS will define this requirement in contracts between the VASLCHCS and its contractors. The VASLCHCS will be responsible for ensuring, through contractually-required documentation or periodic site visits, contractors are using appropriate storm water controls and following the standard operation procedures, storm water control measures, and good housekeeping practices.

7.2 Inventory

As mentioned above, the VASLCHCS inventories its facilities and sorts each facility into a general category. While the categories may be tailored to the specifics of the VASLCHCS, the majority of the facilities should be able to be sorted into the following list of categories. Any additional categories or irrelevant categories may be added or omitted.

- Hospital Buildings
- Administrative Buildings
- Domiciliary
- Hazardous Material and Chemical Storage Buildings
7.3 Assessment

The inventory of VASLCHCS-owned/operated facilities includes an assessment for their potential to contribute pollutants (sediment, nutrients, metals, hydrocarbons, pesticides, chlorides, and trash) to storm water discharges. A worksheet has been created (Appendix E) for the VASLCHCS assessment. The assessment is performed by evaluating each facility with two sets of criteria. The first set of criteria is to determine the facility’s potential to discharge. A numerical ranking will be assigned based on the following criteria:

1. No contaminants available for discharge
2. Small amounts of contaminants available for discharge with good structural controls
3. Significant amounts of contaminants available for discharge with good structural controls or small amounts of contaminants available for discharge with poor structural controls
4. Significant amounts of contaminants available for discharge with poor structural controls
5. Large amount of contaminants available for discharge which are uncontrolled and either have a history of past problems or have known discharges

The second set of criteria used to determine the facility’s potential to generate storm water pollutants is an alphabetic ranking as follows:

A. Amount of urban pollutants stored at the site (small vs. large)
B. Where material stored (proper vs. improper storage)
C. Where activities must be performed (inside vs. outside)
D. Proximity to water bodies (adjacent vs. distant)
E. Housekeeping practices (good vs. poor practices)
F. Discharge of pollutants of concern to impaired waters

Using the results of the two sets of criteria above, a high-priority ranking shall be assigned to a facility when any of the following three conditions are met:

1. Facility has a numerical ranking of 5 on any of the pollutants
2. Facility has a numerical ranking of 4 and any of the factors B, C, D, or F applies
3. Facility has a numerical ranking of 3 and factor F applies

Each subject facility will be assessed for ‘high-priority’ status by evaluating the facility for quantity of urban pollutants stored at the site, identification of improperly stored materials, activities performed outdoors, proximity to water bodies, poor housekeeping practices, and discharges of pollutants of concern to impaired waters.
7.4 **Inspection**

The VASLCHCS will perform inspections on all high-priority facilities. Three types of inspections are required:

1. Weekly visual inspection of all high-priority facilities shall be performed. The weekly inspection will simply be a visual inspection of high-priority facilities seeking to identify evidence of spills.

2. Quarterly inspection will be performed on all high-priority facilities. The quarterly inspection requires a comprehensive inspection of the high-priority facilities where specific attention is paid to waste storage areas, dumpsters, vehicle and equipment maintenance areas, and similar pollutant generating areas.

3. Quarterly visual inspection will be performed of storm water discharges. The quarterly visual inspection of storm water discharges will require a visual observation of the storm water discharges from high-priority facilities. This inspection may be combined with the quarterly inspection of high-priority facilities as long as the inspection is conducted during a storm event.

Any spills identified during any of the inspections will be immediately cleaned up to prevent contact with precipitation or runoff. Additionally, any problems with the discharge, such as color, foam, turbidity, sheen, etc., must be remedied to prevent discharge. The VASLCHCS will track inspections in a log for every facility and keep the records with the SWMP document. The log will include any identified deficiencies and the corrective actions taken to fix the deficiencies.

7.5 **Training**

The VASLCHCS will ensure all employees with duties involving construction, operations, or maintenance are provided training annually related to storm water management, planning & review, implementation, and inspection. New hires shall be trained immediately and prior to the start of duties. Records of each training session will be retained and will include, date, attendees’ names/position, and topics discussed.
7.6 Goals & Actions

**Inventory and Assessment**

Objective: Maintain an inventory, organized by function, of facilities assessed to determine high-priority facilities posing the greatest threat to storm water quality.

**Rationale:**
The VASLCHCS is a large campus with numerous potential sources of runoff pollution. Identifying the most likely sources of pollution will help the VASLCHCS be efficient with its resources and simultaneously have the largest impact on storm water pollution prevention.

**Actions:**
- Annually - review and update the facility inventory and high priority designations

**Assessment:**
Document inventory and assessment of facilities. Include a copy of the assessed inventory with the SWMP. Reevaluate the inventory and assessment annually.

**Standard Operating Procedures**

Objective: Procedures in place for each high-priority facility

**Rationale:**
Each high-priority facility will have a procedure tailored specifically to the water quality challenges the facility poses. The procedure will establish consistency surrounding the circumstance of each potential source of storm water pollution. The consistency primarily ensures potential pollutants are always managed in such a way as it minimizes the potential for contamination. The secondary benefit of the consistency is the pollution prevention measures will be more easily evaluated for efficacy and changes can be made to the procedure as necessary.

**Actions:**
- Annually - Review and update SOPs as necessary to minimize impacts to storm water from facility operations

**Assessment:**
Document each procedure update in the SWMP. Train all applicable staff on the procedures. Evaluate and adjust procedure annually based upon efficacy.

**Inspection Program**

Objective: Maintain a storm water pollution prevention inspection program

**Rationale:**
Since the efficacy of most storm water pollution prevention methods are eroded over time, it is critical all of the BMPs are evaluated.

**Actions:**
- Weekly – Inspect High Priority Facilities
- Quarterly – Inspect High Priority Facilities
- Quarterly – Inspect storm water discharges

**Assessment:**
Document inspections for each high-priority area and each storm water discharge as well as the party responsible for conducting the inspections, findings, and resulting
<table>
<thead>
<tr>
<th>Staff Training</th>
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</thead>
<tbody>
<tr>
<td><strong>Objective:</strong> Provide training to all staff with duties involving construction, operations, and maintenance.</td>
</tr>
<tr>
<td><strong>Rationale:</strong> Runoff has the potential to contribute significant pollutants to receiving waters. Proper site management is important to protect these receiving waters.</td>
</tr>
<tr>
<td><strong>Actions:</strong></td>
</tr>
<tr>
<td>• Annually – provide training to staff.</td>
</tr>
<tr>
<td>• New hires will be trained immediately and prior to the start of any duties which could impact storm water.</td>
</tr>
<tr>
<td><strong>Assessment:</strong> Document training sessions. Solicit additional training ideas and topics from staff.</td>
</tr>
</tbody>
</table>
SECTION 8: NITROGEN AND PHOSPHORUS REDUCTION

8.1 Reduction
The VASLCHCS addresses water quality impacts from excess nitrogen and phosphorus in the water. The primary source of nitrogen and phosphorus on the campus is from landscape maintenance. SOP 12 has been updated to reflect the requirement for soil testing to determine the amount and types of fertilizer required prior to application.

8.2 Education
As discussed in Section 2, VASLCHCS provides educational materials on nitrogen and phosphorus impacts, behaviors of concern, and ways to reduce usage during Earth Day activities. The information will be included on the SWMP website along with other educational materials on storm water.
SECTION 9: SWMP MAINTENANCE

9.1 Review
In preparation of the annual report discussed in Section 9.5, the VASLCHCS will conduct an annual review of this SWMP document. During the course of this review changes may be required to the SWMP document. In the event an update is required, the following procedure must be followed:

1. Changes adding (but not subtracting or replacing) components, controls, or requirements to the SWMP document may be made at any time upon written notification to the State of Utah Division of Water Quality.

2. Changes replacing an ineffective or unfeasible BMP specifically identified in the SWMP document with an alternate BMP may be adopted at any time provided the analysis is clearly outlined and subsequently approved by the State of Utah Division of Water Quality. An analysis shall include:
   a. An explanation of why the BMP is ineffective or infeasible,
   b. Expectations or report on the effectiveness of the replacement BMP, and
   c. An analysis of why the replacement BMP is expected to achieve the goals of the BMP to be replaced, or has achieved those goals.

Change requests and/or notifications will be made in writing, be signed and certified, and submitted to the State of Utah Division of Water Quality for review. These change requests and/or notifications will receive confirmation and approval or denial in writing from the State of Utah Division of Water Quality. Additionally, updates or revisions may be required by the State of Utah Division of Water Quality.

9.2 Analysis of Capital and O&M Expenditures
The VASLCHCS is committed to securing the resources necessary to meet all requirements of its MS4 permit. An annual analysis is conducted of the capital, operation, and maintenance expenditures needed, allocated, and spent as well as the necessary staff resources needed and allocated to meet the requirements of this permit, including any development, implementation, and enforcement activities required. A summary of its fiscal analysis is included with the annual report.

9.3 Monitoring
As part of the Small MS4 General UPDES Permit UTR090000, the VASLCHCS is not required to conduct analytical monitoring during the effective term of the Permit. However, sampling may be required for the characterization of illicit discharges as required.

9.4 Recordkeeping
The VASLCHCS will keep all supplementary documents associated with the General Permit current and any modifications will be submitted to the State of Utah Division of Water Quality for