

Storm Water Management Program

**Texas Pollutant Discharge Elimination System
Phase II – Small Municipal Separate Storm Sewer System
Permit TXR040000**



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1 NOTICE OF INTENT

In accordance with the provisions of Chapter 26 of the Texas Water Code, The University of Texas Permian Basin (the “University”) has prepared this Storm Water Management Program and hereby applies for coverage under the Texas Pollutant Discharge Elimination System (TPDES) General Permit TXR040000 to discharge storm water into the waters of the United States from the University’s Municipal Separate Storm Sewer System (MS4) located on the main campus of the University. The University does not own or operate any industrial operations whose activities would be subject to TPDES industrial storm water rules, regulations, and/or permitting.

The main campus of The University of Texas Permian Basin is located on the northeast side of the City of Odessa. It is bordered by University Boulevard on the south, JBS Parkway on the west, 42nd on the north, and Loop 338 on the east. See Attachment 1.

An MS4 is a conveyance that includes roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains that are owned and operated by a jurisdiction for the collection and conveyance of storm water. The University MS4 conveys storm water from roads, curb cuts and drainage swales into the City of Odessa’s MS4, which discharges to Monahan’s Draw, then eventually to Beals Creek and the Colorado River below Lake J. B. Thomas, designated as Segment 1412. The site location within the City of Odessa’s MS4 is shown in Attachment 2.

The University of Texas Permian Basin and the University of Texas System Board of Regents own lands outside these boundaries. However, these lands are undeveloped, do not have stormwater conveyances that link with the main campus, and have no stormwater conveyances that meet the definition of a small MS4. Therefore, this NOI applies only to the bounds of the main campus of the University as described above.

The persons responsible for implementation/coordination of the plan are:

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The University components that assisted with the development of the SWMP include the Office of Environmental Health & Safety and Physical Plant.

2 RECORDKEEPING AND REPORTING

The University maintains all inspection records and can make them available to the TCEQ within a reasonable time frame. This SWMP and the General Permit TXR040000 will be accessible to the TCEQ at all times in the University's Environmental Health & Safety office.

A copy of the NOI and SWMP will be available to the public at J. Conrad Dunagan Library on the University campus, located at 4901 E. University Boulevard, Odessa, Texas.

Annual reports will be prepared and submitted within 90 days of the end date for the following permit years:

Permit Year	Begin date	End Date
One	January 24, 2019	December 31, 2019
Two	January 1, 2020	December 31, 2020
Three	January 1, 2021	December 31, 2021
Four	January 1, 2022	December 31, 2022
Five	January 1, 2023	December 31, 2023

3 SWMP DEVELOPMENT AND REVIEW

This SWMP was prepared in accordance with TCEQ regulations.

The University will review and modify the SWMP in conjunction with the preparation of the annual report and as necessary throughout the permit term. Modifications will be made within 180 days of identifying the need for a procedural change, and the changes will be summarized in the annual report.

4 MINIMUM CONTROL MEASURES

As required by TPDES General Permit TXR040000, Part III, Section B, this SWMP implements the following Minimum Control Measures (MCMs):

1. Public Education, Outreach, and Involvement
2. Illicit Discharge Determination and Elimination
3. Construction Site Stormwater Runoff Control
4. Post Construction Storm Water Management in Areas of New Development and Redevelopment
5. Pollution Prevention/Good Housekeeping for Municipal Operations

4.1 MCM 1 – PUBLIC EDUCATION, OUTREACH, AND INVOLVEMENT

The Public Education Outreach and Involvement MCM consists of Best Management Practices (BMPs) that focus on involving the campus community in development and implementation of the SWMP. Compliance with State, Tribal, and local public notice requirements and the development and dissemination of educational materials designed to inform the public about how storm water discharges impact local water bodies and how the public can reduce pollutants in storm water runoff will help facilitate public involvement. For the University, the terms “public” and “community” refer to the faculty, staff, and students that work and attend classes at the University, contractors who perform work on campus, and visitors to campus.

The BMPs describe the plan to actively involve the campus community in development and implementation of the SWMP; the steps they can take to reduce storm water pollution; the types of public involvement activities included in the program; how individuals and groups will be informed on how to become involved in the storm water program; and the mechanisms that will be used to reach target audiences. The target audiences for the public involvement program are all faculty, staff, and students on campus and members of the general public located within the City of Odessa and surrounding areas who are concerned with storm water quality on the University campus. These BMPs were selected to allow the University to use existing educational tools and practices in addition to including new BMPs that will improve our education, outreach, and involvement programs.

The target audiences for the following programs are specified in the individual BMPs described below. The target audiences were selected based on regulation requirements with the goal of educating and involving the community about how storm water discharges impact local water bodies and the steps the public can take to reduce pollutants in storm water runoff. The Public Education, Outreach, and Involvement program and BMPs are expected to reach all of the constituents within the MS4's permitted boundary, the main campus of the University.

Evaluation of the success of this MCM will be a thorough analysis of the measurable goals for each BMP included in this MCM. Measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. The responsibility for implementation of this MCM is described with each BMP procedure.

4.1.1 BMP 1: Flyers or Brochures

Development of flyers and/or brochures for the purpose of educating the campus community on storm water quality issues and steps they can take to reduce pollutants in storm water runoff.

Implementation Tasks:

Develop handouts regarding water quality on campus and in West Texas, which communicate the hazards associated with illegal discharges and improper disposal of waste, and include information about how to detect and report illicit discharges.

- Distribute handouts at informational booths staffed by EH&S during Welcome Week

each semester.

- Place handouts in the library for the campus community and visitors.
- Make handouts available for download on the EH&S website.
- All handouts will be included in orientation packets for students and parents.

Measurable Goals:

Year 1: Develop stormwater outreach material.

Years 1-5: Provide pamphlets to 100% of students and parents in orientation packets.

Responsible Party:

Environmental Health & Safety

4.1.2 BMP 2. Public Website

Update EHS website to include the SWMP and annual report information. Provide contact information for public feedback, which could include top issues, spills, and litter. Information can be found at <https://www.utpb.edu/university-offices/ehs/index>.

Implementation Tasks:

Within 30 days of the SWMP approval, the SWMP will be posted on the EHS website. The annual report will be posted within 30 days after the report's due date.

Contact information include the EH&S phone and email for normal working hours. After hours, the contact will be Police Dispatch.

Measurable Goals:

Year 1-5: MS4 annual report will be uploaded to the website by December of each year.

Responsible Party:

Environmental Health & Safety

4.1.3 BMP 3. Community Cleanup Events

Join in sponsorship and management with community organizations who host campus and local cleanup events.

Implementation Tasks:

Join in sponsorship and management, Sustainability Committee for Earth Day events and Student Life for campus and roadway cleanup events.

Measurable Goals:

- Year 1: Identify current campus cleanup events and offer support.
- Year 2: Start new cleanup events hosted by EH&S to happen annually.
- Years 2-5: **Hold at least two community cleanup events by December each year.**
Document number of participants in the events and estimated volumes of litter collected.

Responsible Party:

Environmental Health & Safety

4.2 MCM 2 – ILLICIT DISCHARGE DETECTION AND ELIMINATION

The Illicit Discharge Detection and Elimination MCM consists of BMPs that focus on the detection, investigation, and elimination of illicit discharges into the MS4. A storm sewer system map showing the location of all outfalls and the name and location of the receiving waters will be developed and maintained per BMP.

BMPs focusing on informing the campus community with regard to the hazards associated with illegal discharges and improper disposal of waste and how to detect and report illicit discharges are described in the Public Education and Outreach MCM.

The BMPs describe the authority mechanism which will be used to effectively prohibit illicit discharges; map update procedures; and enforcement procedures and actions to ensure that the regulatory mechanism is implemented. The EH&S email will be used for the community to ask questions and offer concerns regarding illicit discharges as well as for notifications for illicit discharges. Along with the general email, EH&S and Police Dispatch phones will also be used to report concerns. **As these complaints are received, they will be investigated as needed. If illicit discharges are found, they will be reported to TCEQ.**

Evaluation of the success of this MCM will be a thorough analysis of the measurable goals for each BMP included in this MCM. Measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. The responsibility for implementation of this MCM is described with each BMP procedure.

The University of Texas Permian Basin is served by the City of Odessa sewage system, therefore does not have an OSSF system.

4.2.1 BMP 1. Litter Collection

Collect litter in outdoor areas of campus.

Implementation Tasks:

Collect litter from outdoor areas on campus daily.

Empty trash and recyclable collection containers regularly.

Measurable Goals:

Years 1-5: Document daily litter collections through use of the computerized work order system. Documentation of man hours will be used for quantification of waste collected.

Responsible Party:

Physical Plant

4.2.2 BMP 2. Illicit Discharge Legal Authority

Develop adequate legal authority to prohibit illicit discharges of non-storm water. Including on-site sanitary sewer overflows, to the MS4.

Implementation Tasks:

Continue to research existing University policies, procedures, and enforcement mechanisms that prohibit specific types of illicit discharges.

Develop or amend policies, procedures, and enforcement mechanisms, as needed, that prohibit all illicit discharges of non-storm water to the MS4 from University sources and from contractors/visitors to the campus.

EH&S and PD will coordinate with the City of Odessa regarding illicit discharges that reach campus.

Measurable Goals:

Years 1-5: Research existing policies, procedures, and enforcement mechanisms that prohibit specific types of illicit discharges.

Years 1-5: Develop supplemental policies, procedures, and enforcement mechanisms, as determined necessary, to prohibit illicit discharges to the MS4.

Responsible Party:

Environmental Health & Safety

4.2.3 BMP 3. Maintain the MS4 Map and Outfall Inventory

Maintain an up-to-date map of the MS4 indicating the locations of storm water discharge outfalls. A detailed map will be used for in-office use in accordance with the overall MS4 map.

Implementation Tasks:

Maintain a map of the MS4 that includes the location of storm water outfalls and the names of streams receiving waters from the University MS4 and continue to update the map as

construction occurs on campus.

Measurable Goals:

Years 1-5: Identify new outfalls and drainage structures added during construction activities. Ensure the map is up-to-date.

Responsible Party:

Environmental Health & Safety

4.2.4 BMP 4. Hazardous Material Response:

Respond to spills and mitigate releases of pollutants into the MS4.

Implementation Tasks:

Respond to, contain, and remediate or insure remediation of spills and releases into the MS4. This will be a joint response between EH&S, PD, OFRH, and contractors. UTPD Dispatch 911 will act as the Emergency Spill Line for streamline response.

The university will make public notification through our Public Notification Officer by the most appropriate method, which could include oral or written communication to the university community.

Maintain trained hazardous materials response personnel, spill kits, and personal protective equipment necessary for this BMP. Physical Plant and Police Department employees will be included in this training provided by EH&S.

Measurable Goals:

Years 1-5: Document the number of hazardous material incidents responded to and if containment and/or removal of a pollutant was conducted to prevent impacts to nearby waterways.

Responsible Party:

Environmental Health & Safety

4.3 MCM 3 – CONSTRUCTION SITE STORM WATER RUNOFF CONTROL

The Construction Site Runoff MCM consists of BMPs that focus on the reduction of pollutants in storm water runoff to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre, including construction activities at sites that are part of a larger plan of development. Additionally, all construction activities on campus that result in a land disturbance of one acre or larger are required to prepare a Storm Water Pollution Prevention Plan (SWPPP) and abide by all regulations of the TPDES Construction General Permit TXR150000.

The BMPs describe procedures for site plan review which incorporate the consideration of potential water quality impacts; procedures for site inspection and enforcement of control measures; enforcement procedures and actions to ensure compliance; requirements for

construction site operators to implement appropriate erosion and sediment control BMPs; 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; and procedures for receipt and consideration of information submitted by the public.

Evaluation of the success of this MCM will be a thorough analysis of the measurable goals for each BMP included in this MCM. Measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. The responsibility for implementation of this MCM is described with each BMP procedure.

4.3.1 BMP 1. Construction Site Inspection

Conduct inspections of construction sites that discharge storm water to the MS4 to determine compliance with TCEQ and University storm water regulations regarding erosion controls, pollution prevention, and proper waste management (including discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste). Inspections will be conducted on construction sites managed by University staff and by Office of Capital Projects (OCP) contractors.

Implementation Tasks:

Develop internal procedures for tracking new and on-going construction activities.

Develop policy and procedure for construction site inspections, compliance measures, and enforcement activities.

Measurable Goals:

Year 1-2: Develop policies and procedures for tracking construction activities, site inspections, and compliance and enforcement actions.

Years 1-5: Inspect 100% of construction sites on the university property.

Years 1-5: Document performance and maintain records of construction site inspections, compliance notes, and enforcement actions.

Responsible Party:

Environmental Health & Safety, OCP

4.3.2 BMP 2. Construction Plans Review

Continue implementation of the construction plans review process that incorporates consideration of potential water quality impacts. This review applies to construction projects carried out by University staff and by contractors.

Implementation Tasks:

Develop procedures to ensure water quality considerations are incorporated into the plan review process for every construction proposal accepted.

Develop internal tracking procedures to cover the following issues: conformance to local, state, and federal storm water regulations; appropriate use of temporary erosion controls; and inclusion of any required University or State storm water permit documents.

Educate EH&S staff, contractors, developers, engineers, and architects currently working on University projects on the construction plan review process for future projects.

Maintain records of plans reviewed and approved for construction under this program.

Measurable Goals:

Year 1-2: Develop procedures to ensure water quality considerations are incorporated into every plan review process.

Year 1-2: Develop tracking procedures to cover the issues listed above.

Years 1-5: **Review 100% of plans submitted.** Document number of plans reviewed and approved/denied under this program.

Years 2-5: Develop and provide training to University staff regarding the construction plans review process. **Ensure all related staff are trained as needed.**

Responsible Party:

Environmental Health & Safety, OCP

4.3.3 BMP 3. Regulatory Mechanism Review

Development and implementation of regulatory mechanism to require erosion and sediment controls and related compliance measures.

Implementation Tasks:

Review current construction contract template for language regarding the University's authority to require erosion and sediment controls and related compliance measures in accordance with construction site runoff control measures. This task shall include authority to require construction site operators to implement appropriate erosion and sediment control management practices and control construction site waste that may cause adverse impacts to water quality. Develop and implement revised contract language if needed to require erosion and sediment controls and related compliance measures in accordance with construction site runoff control measures.

Measurable Goals:

Year 1: Review current contract template for authority to require erosion and sediment controls and related compliance measures in accordance with construction site runoff control measures.

Years 1-5: Develop and implement revised contract language if needed to require

erosion and sediment controls and related compliance measures in accordance with construction site runoff control measures.

Responsible Party:

Environmental Health & Safety

4.3.4 BMP 4. Community Submitted Information

Develop policies and procedures for receipt and consideration of information submitted by the campus community regarding construction sites and activities on campus.

Implementation Tasks:

In conjunction with the Public Involvement/Participation MCM, develop policies and procedures to receive and consider information submitted by the campus community regarding construction sites and activities.

Measurable Goals:

Years 1-5: Develop and implement policies and procedures to receive and consider information related to construction sites and construction activities that relate to possible impacts to storm water quality. Information will be submitted by email or calling EH&S.

Years 1-5: Identify the number of times information is submitted by the campus community as part of this BMP and use this information to improve impact of these sites to storm water quality.

Responsible Party:

Environmental Health & Safety, OCP

4.4 MCM 4 – POST CONSTRUCTION STORM WATER MANAGEMENT IN AREAS OF NEW DEVELOPMENT AND REDEVELOPMENT

The Post-Construction Storm Water Management MCM consists of BMPs that focus on the prevention or minimization of water quality impacts from new development and redevelopment projects that disturb greater than or equal to one acre and storm water runoff from new/redevelopment activities from sites that are part of a larger common plan of development that discharge into the UT Permian Basin MS4. The BMPs describe structural and non-structural practices and procedures to ensure long term operation and maintenance of BMPs. BMPs focusing on education programs for contractors and the campus community with regard to project designs that minimize water quality impacts are described in the Public Education and Outreach MCM.

Evaluation of the success of this MCM will be a thorough analysis of the measurable goals for each BMP included in this MCM. Measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. The responsibility for

implementation of this MCM is described with each BMP procedure.

4.4.1 BMP 1. Long Term Operation and Maintenance

Inspect and maintain currently installed structural controls for reducing and preventing storm water pollution.

Implementation Tasks:

Develop a list of structural controls for reducing and preventing storm water pollution that are currently in place at the University. Update the list of BMPs as needed.

Identify needs for additional erosion control projects and implement appropriate structural and/or non-structural pollution prevention measures.

Develop criteria in the computerized work order system to maintain record of and ensure regular inspections and maintenance of these BMPs.

Measurable Goals:

Years 1-5: Develop the list of structural BMPs currently in place at the University.

Years 1-5: Document inspections and maintenance of structural BMPs currently in place at the University.

Years 1-5: Document additional structural and non-structural pollution prevention measures put in place to address long term maintenance needs.

Years 1-5: All structural and nonstructural BMPs will be inspected by December of each year.

Years 1-5: Document and maintain records of enforcement actions.

Responsible Party:

Physical Plant and Environmental Health & Safety

4.4.2 BMP 2. Post-Construction Structural/Non-Structural Controls:

Coordinate with developers/contractors to implement the most effective and practical pollution prevention measures and BMPs within new and redevelopment projects. All University-managed projects will include planning for post-construction structural and non-structural erosion control measures.

Implementation Tasks:

Develop a list of practical structural and non-structural pollution prevention measures and BMPs for use on the University campus from existing sources (EPA, TCEQ, OCP, Permian Basin Regional Planning Commission, etc.).

Share this list with all Physical Plant personnel involved in upkeep of BMPs and with contractors/developers working on campus.

Measurable Goals:

Years 1-2: Develop a list of practical structural and non-structural pollution prevention measures and BMPs for use on the University campus.

Years 1-5: Train 20% of Physical Plant personnel by December of each year.

Years 1-5: Document training attended by Physical Plant personnel regarding implementation and maintenance of structural and non-structural BMPs.

Responsible Party:

Environmental Health & Safety and Physical Plant

4.5 MCM 5 – POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

The Pollution Prevention/Good Housekeeping MCM consist of BMPs that focus on training and on the prevention and/or reduction of pollutant runoff from municipal operations. The BMPs describe the creation and use of training materials; and controls for reducing or eliminating the discharge of pollutants from streets, roads, parking lots, maintenance shops. Maintenance of structural controls to reduce or eliminate pollution is described in the MCM for Post-Construction Storm Water Management.

Specific University operations that are impacted by the proposed operation and maintenance programs listed here include grounds-keeping/landscape maintenance, equipment maintenance, and construction/carpentry/remodel activities. However, all Physical Plant personnel will obtain at least the general training described in this MCM.

Evaluation of the success of this MCM will be a thorough analysis of the measurable goals for each BMP included in this MCM. Measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. The responsibility for implementation of this MCM is described with each BMP procedure.

4.5.1 BMP 1. Litter Collection

Daily collection of litter on all outdoor areas on campus. Trash receptacles and recycling bins are distributed throughout the campus for the community's use in pollution prevention.

Implementation Tasks:

Continue daily collection of litter from all outdoor areas on campus.

Continue to empty trash receptacles and recycling bins as needed to aid in pollution prevention.

Continue to oversee contractors and employees to ensure that trash receptacles are emptied and

litter is collected on campus.

Create a standing work order in the computerized work order system to track these activities.

Measurable Goals:

Year 1: Create the standing work order.

Years 1-5: Use the work order system to document daily litter collection activities.

Years 1-5: Ensure that 100% of waste is disposed of in accordance with 30 TAC 330 or 335, as applicable.

Responsible Party:

Physical Plant

4.5.2 BMP 2. Waste Collected During Maintenance of Storm Water Structural Controls

Waste removed from the MS4 as a result of maintenance of storm water structural controls will be disposed of properly.

Implementation Tasks:

Properly dispose of all wastes collected as the result of maintenance of storm water structural controls, including dredge spoil, accumulated sediments, and floatables. **This includes evaluating O&M activities for their potential to discharge pollutants in stormwater for road and parking lot maintenance, cold weather operations, and right-of-way maintenance, etc.**

Environmental Health & Safety and Physical Plant will coordinate efforts to ensure wastes are collected and properly disposed.

Create standing work order in computerized work order system to track activities.

Measurable Goals:

Years 1-5: Document disposal amounts and procedures for disposal of these wastes.

Responsible Party:

Environmental Health & Safety and Physical Plant

4.5.3 BMP 3. Training

Develop and make available training modules, either through online or in-person training sessions. Supervisors will determine which training modules should be taken by each employee based upon the employee's job description and anticipated duties.

Implementation Tasks:

Create a general training module to be completed annually by all Physical Plant personnel on: the impacts of and hazards associated with storm water pollution; common methods of storm

water pollution prevention; litter control; proper clean up procedures, spill containment and disposal methods; how to detect and report illicit discharges; and the safe storage of chemicals, paints and the like. Training will be developed on site or obtained from the EPA, TCEQ, and/or other local resources.

Identify all Physical Plant staff for which targeted training should be developed.

Create and/or update training on the proper management of leaf/lawn litter, construction debris, cleaning supplies, pesticides/insecticides, oil, antifreeze, etc. as appropriate to each discipline within Physical Plant based upon the identified needs for targeted training.

Measurable Goals:

Years 1-2: Create general and specific training modules and post them online for employees to access and take, or offer in-person training sessions.

Years 2-5: Train 100% of staff in good housekeeping practices for O&M activities.

Years 2-5: Document the number of employees completing initial/annual trainings.

Responsible Party:

Environmental Health & Safety

4.5.4 BMP 4. Spill Prevention Plan

Comply with federal spill prevention control and counter measures plan regulations, and review spill response procedures to ensure storm water quality protection measures are considered during spill response.

Implementation Tasks:

Conduct annual employee training on pollution prevention and spill response through online and/or in-person training sessions.

Update Spill Prevention Control and Countermeasures (SPCC) plan according to SPCC regulations.

Measurable Goals:

Year 1: Reassess and adapt the current UT Permian Basin SPCC plan according to SPCC regulations.

Years 2-5: Train all related employees on the University's SPCC plan by December of each year. Document number of employees attending training.

Years 1-5: Document 100% of spills occurring on campus and implementation of the SPCC.

Responsible Party:

Environmental Health & Safety

4.5.5 BMP 5. Contractor Oversight

Establish procedures to ensure contractor compliance with University storm water management requirements.

Implementation Tasks:

Conduct pre-construction meetings with contractors and the designated Physical Plant project manager to establish controls to reduce and/or eliminate pollutant runoff.

Routinely inspect applicable construction/project sites to assess the effectiveness of controls. Make changes as needed to ensure that pollutants, including sediment, trash, and floatables aren't entering the storm drains or exiting outfalls.

Measurable Goals:

Years 1-2: Coordinate requirements and procedure with Physical Plant staff.

Years 1-5: **Document all pre-construction meetings.**

Years 1-5: Document 100% of pollution runoff and corrective actions, as applicable.

Responsible Party:

Environmental Health & Safety and Physical Plant

4.5.6 BMP 6. Stormwater Management Controls

Maintain an inventory of University facilities and stormwater controls to include identifying pollutants of concern that could be discharged from municipal operations and maintenance activities.

Implementation Tasks:

Add new facilities and stormwater structural controls to the inventory list.

Conduct periodic assessments to update the inventory and identify pollutants of concern that could be discharged from municipal operations and maintenance activities.

Measurable Goals:

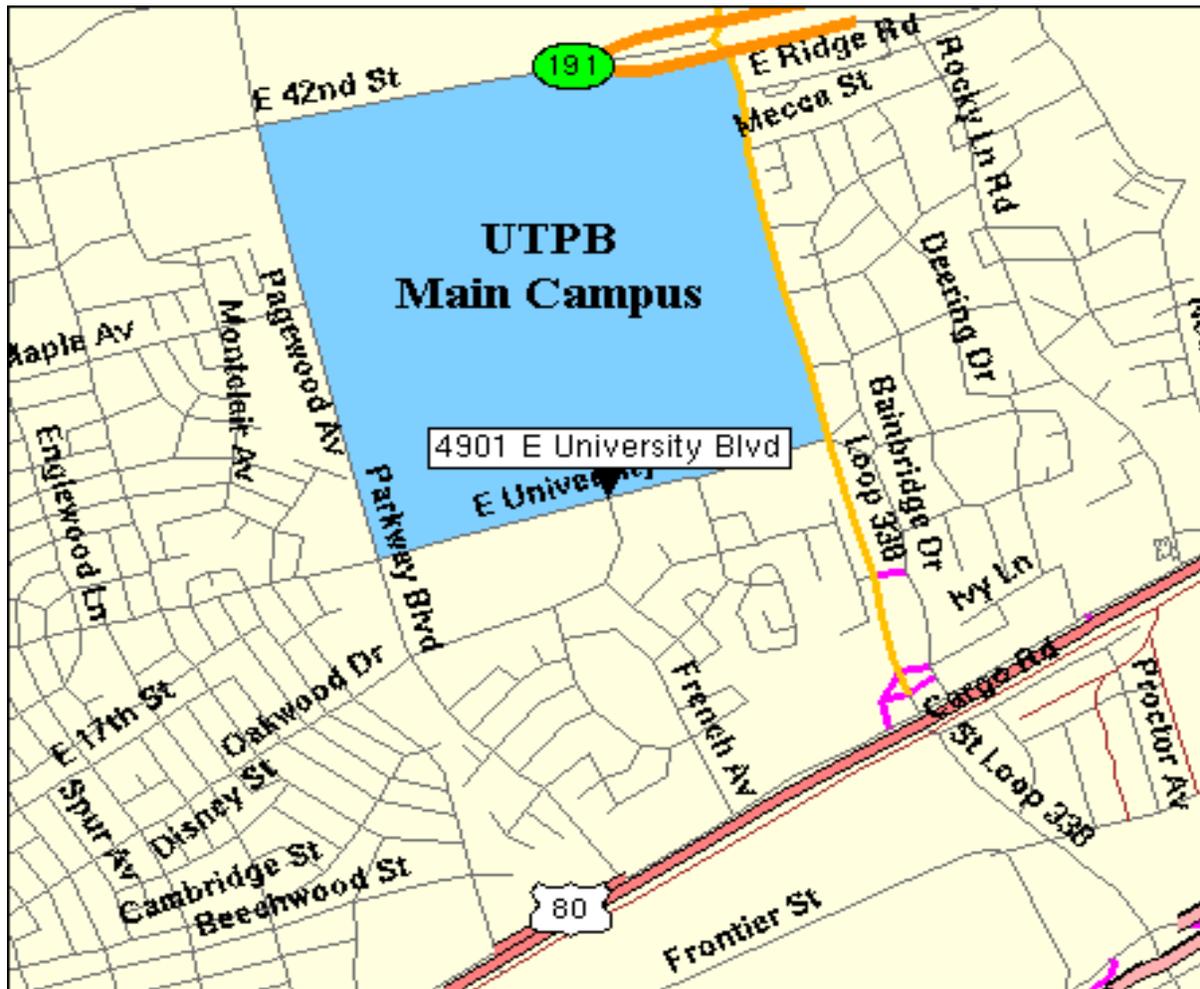
Year 1: Develop the facilities and stormwater structural controls inventory.

Years 1-5: **Maintain 100% of the facilities and stormwater structural controls inventory.**

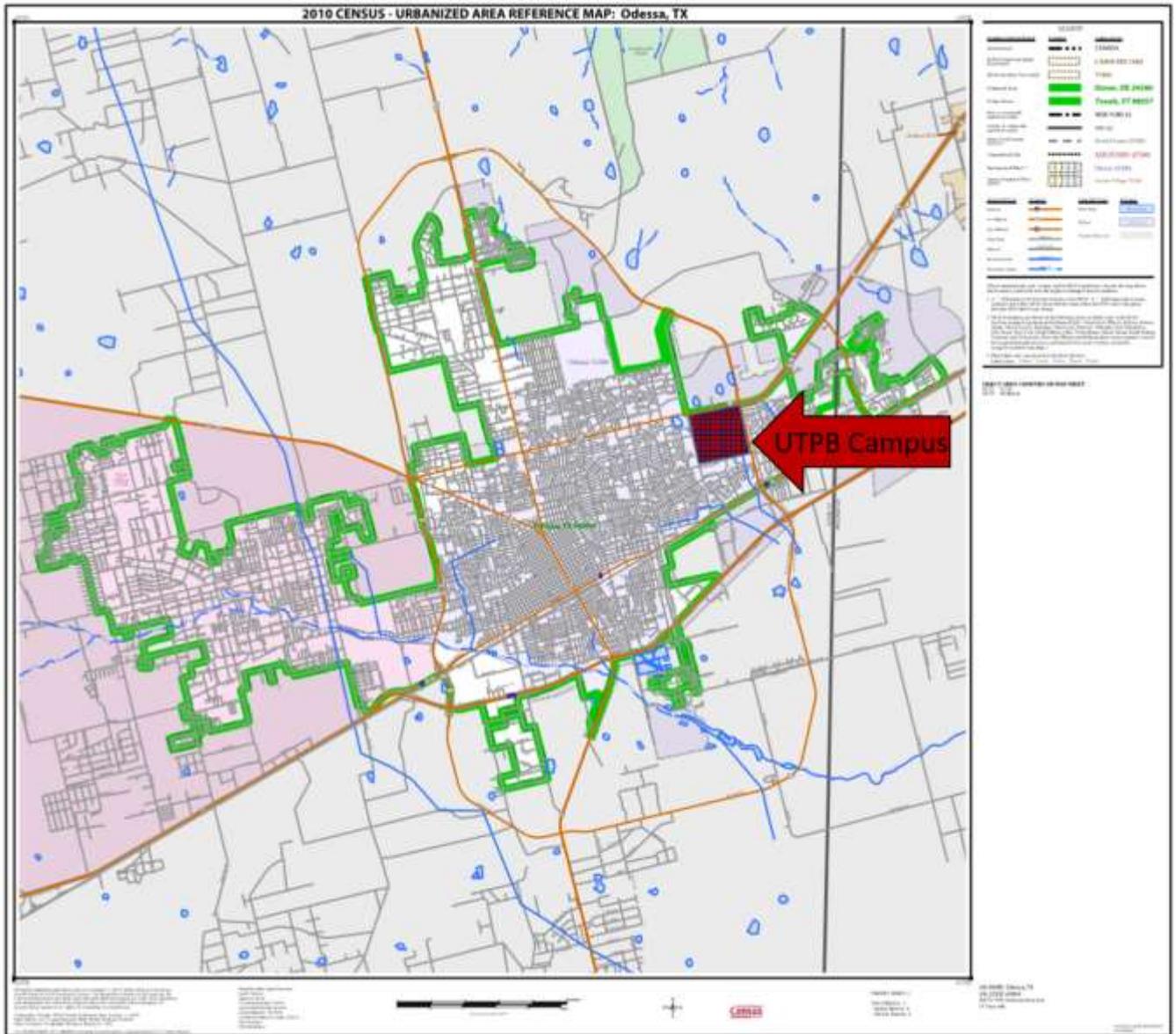
Years 1-5: **Identify all pollutants of concern that could be discharged from municipal operations and maintenance activities and develop structural and non-structural controls.**

Responsible Party:
Environmental Health & Safety

ATTACHMENT 1: UT PERMIAN BASIN BOUNDARIES



ATTACHMENT 2: SITE LOCATION MAP



ATTACHMENT 3: UT PERMIAN BASIN MS4 MAPS

MS4 Maps must show all outfalls as well as receiving waters. Monahans Draw is the nearest receiving water, but due to size and scale, it is not shown on a detailed MS4 map.



