

DOÑA ANA COUNTY
NPDES SMALL MS4 ANNUAL REPORT
SEPTEMBER 2011



NPDES TRACKING NO. NMR04L003
JULY 1, 2010 – JUNE 30, 2011



CERTIFICATION

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

Signed by:

Robert Armijo, PE
County Engineer
Doña Ana County, NM

Date

NPDES Tracking No.: NMR04L003
MS4 Permittee Name: Doña Ana County
Address: 845 N. Motel Blvd, Las Cruces, NM 88007

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COMPLIANCE SUMMARY



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1.0 INTRODUCTION

Doña Ana County is the operator of a Small Municipal Separate Storm Sewer System (MS4), as defined in the NPDES General Permit for Discharges from Small MS4s. Part 5.8 of the general permit requires the County to submit an annual report to the EPA. The purpose of the report is to document the County's status of compliance with permit conditions and its progress towards meeting the goals of the SWMP. The report is due to the EPA by October 1st of each year.

Doña Ana County, with assistance from Martich Professional Services, PLLC, prepared this report to satisfy the permit's reporting requirement for the permit year of July 1, 2010 through June 30, 2011, also called the fourth permit year (Year 4). The County is not relying on another government entity to satisfy any of its permit requirements. The report was organized according to guidance provided by Ms. Thea Lomax, Storm Water Enforcement, EPA Region 6, at EPA Region 6's 12th Annual MS4 Operators Conference in Santa Fe, NM on June 25, 2010.

This document, **Compliance Summary**, is the first part of the report. The entire report consists of the following documents placed on compact disks (except the certification) for submission to the EPA:

- Report certification
- CD #1 – Compliance Summary
- CD #2 – Public Education and Outreach and Public Involvement/Participation
- CD #3 – Illicit Discharge Detection and Elimination
- CD #4 – Construction Site Storm Water Runoff Control and Post-Construction Storm Water Management in New and Redevelopment
- CD #5 – Pollution Prevention/Good Housekeeping for Municipal Operations
- CD #6 – Appendices

For purposes of posting the report online and binding the report for public review, the report documents will be in modules under the above titles.

2.0 MS4 INFORMATION

The following information is provided for EPA's tracking purposes.

NPDES Tracking No.:	NMR04L003
MS4 Permittee Name:	Doña Ana County
Address:	845 N. Motel Blvd, Las Cruces, NM 88007
Point of Contact:	Henry K. Corneles, PE, Engineer Supervisor
Phone Number:	575-525-6162
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The parts of Doña Ana County's MS4 that are authorized to discharge storm water under the NPDES General Permit for Small MS4s are located in the unincorporated portions of the Las Cruces and El Paso Urbanized Areas. These portions of the urbanized areas included the Census Designated Places of Doña Ana, Santa Teresa, and Berino. There were no changes to the boundary of the MS4 last year.



3.0 COMPLIANCE STATUS

During the past year, Doña Ana County submitted its 2010 Small MS4 Annual Report to the EPA. The County received no comments from the EPA. The County continues to implement its SWMP as scheduled.

During the fourth permit year, Doña Ana County had no discharges that violated the conditions of its authorization under the NPDES General Permit for small MS4s. The County is in compliance with the conditions of the permit at the time of the annual report.

3.1 POLLUTANT REDUCTION GOALS AND SCHEDULE

The County's SWMP is designed to achieve the statutory goal of reducing the discharge of pollutants to the maximum extent practicable (MEP). The EPA has defined MEP for a Small MS4 to be effectively implementing six Minimum Control Measures (MCMs). The six MCMs are:

- Public Education and Outreach on Storm Water Impacts
- 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

Effective implementation is defined by accomplishing measurable goals for each of the MCMs. Tables 1 – 6 summarize the County's progress toward achieving the measurable goals this past year (permit year four). The tables also contain a schedule of activities planned for next year. A full assessment of the BMPs and their effectiveness is in the MCM sections of the annual report.



Table 1. Public Education and Outreach

BMP NO.	BMP DESCRIPTION	RESPONSIBLE DEPARTMENT	MEASURABLE GOALS PERMIT YEAR 4 (2010 - 2011)	PROGRESS ON GOALS PERMIT YEAR 4 (2010 - 2011)	PLANNED ACTIVITIES PERMIT YEAR 5 (2011 - 2012)
1-1	Public Education with Printed Material	Engineering	Develop or obtain one educational item and track distribution	Completed	Develop or obtain one educational item and track distribution
1-2	Public Education by Radio	Public Information	Quarterly address storm water issues on a County radio show Broadcast two PSAs in Spanish, one as scheduled and one to make up for Year 3	In progress Delayed	Quarterly address storm water issues on a County radio show Broadcast two PSAs in Spanish
1-3	Storm Water Mgmt Webpage	Public Information	Review and update the webpage, and track the number of "hits"	Completed	Review and update the webpage, and track the number of "hits"
1-4	Pollution Prevention Information for Animal Owners	Engineering and Sheriff's Office/Animal Control	Develop fact sheet or brochure, and track distribution	Delayed	Develop fact sheet or brochure, and track distribution
1-5	Pollution Prevention Information for Auto Repair Shops and Recyclers	Engineering and Comm. Dev.	No activity scheduled	Not applicable	Develop fact sheet or brochure, and track distribution to new businesses
1-6	Pet Waste Signs at Parks	Facilities & Parks	Install signs at 2 parks	Delayed	Install signs at 4 parks, 2 for 2012 and 2 to make up for 2011
1-7	Elementary School Presentations with City of Las Cruces	Engineering	Meet with the City of Las Cruces and discuss opportunities to assist with presentations	Completed	Meet with the City of Las Cruces and discuss opportunities to assist with presentations
1-8	Watershed-based Education on Bacteria Sources	Engineering	Participate in a minimum of four Paso Del Norte Council's activities for its Section 319(h) Watershed Restoration Grant	Completed	Participate in a minimum of four Paso Del Norte Council's activities for its Section 319(h) Watershed Restoration Grant
1-9	Outreach to Gadsden ISD	Engineering	Continue discussion with Gadsden ISD and determine feasibility of outreach program	On schedule	Determine feasibility of a storm water outreach program for the Gadsden ISD



Table 2. Public Involvement/Participation

BMP NO.	BMP DESCRIPTION	RESPONSIBLE DEPARTMENT	MEASURABLE GOALS PERMIT YEAR 4 (2010 - 2011)	PROGRESS ON GOALS PERMIT YEAR 4 (2010 - 2011)	PLANNED ACTIVITIES PERMIT YEAR 5 (2011 - 2012)
2-1	Presentations to the Board of County Commissioners (BOCC)	Engineering	Present the 2009-2010 Annual Report to the BOCC	Completed	Present the 2010-2011 Annual Report to the BOCC
2-2	NOI and SWMP on Storm Water Webpage	Public Information	Add link to 2010 Annual Report	Delayed	Add link to 2010 and 2011 Annual Reports
2-3	Webpage Comment Form for the SWMP	Public Information	Track number of forms received and the County's response	Completed	Track number of forms received and the County's response
2-4	Maintain a Copy of the NOI and SWMP for Public Viewing	Engineering	Place a copy of the 2010 annual report with the SWMP for public viewing	Completed	Place a copy of the 2011 annual report with the SWMP for public viewing
2-5	Public Comment Log	Engineering	Continue to maintain the record	Completed	Continue to maintain the record
2-6	Storm Water Pollution Report Line	Engineering, Utilities and Sheriff's Office/Codes	Establish procedures for documenting, tracking, processing, and responding to the calls; track number and types of calls	Delayed	Establish procedures for documenting, tracking, processing, and responding to the calls; track number and types of calls
2-7	Volunteer Cleanup Activities	Engineering, Utilities and Sheriff's Office/Codes	Track the number of clean-up activities and amount of trash collected	Completed	Track the number of clean-up activities and amount of trash collected



Table 3. Illicit Discharge Detection and Elimination

BMP NO.	BMP DESCRIPTION	RESPONSIBLE DEPARTMENT	MEASURABLE GOALS PERMIT YEAR 4 (2010 - 2011)	PROGRESS ON GOALS PERMIT YEAR 4 (2010 - 2011)	PLANNED ACTIVITIES PERMIT YEAR 5 (2011 - 2012)
3-1	Public Information on Trash and HHW Disposal	Public Information	Develop fact sheet or brochure; place in dispensers at County buildings; track distribution	Completed	Track distribution
3-2	HHW Disposal Guidance on the Website	Public Information	Maintain information about HHW disposal on website, and track number of "hits"	Completed	Maintain information about HHW disposal on website, and track number of "hits"
3-3	Illegal Dumping Enforcement	Sheriff's Office/Codes	Track number of citations issued	Completed	Track number of citations issued
3-4	Storm Water Management Ordinance	Engineering and Sheriff's Office/Codes	Track illicit discharge enforcement actions	Completed	Track illicit discharge enforcement actions
3-5	Illicit Discharge Training	Engineering, Sheriff's Office and Comm. Dev.	Train illicit discharge inspectors	Delayed	Train illicit discharge inspectors
3-6	Wastewater Collection for Areas with On-site Systems	Utilities	Maintain a five year Infrastructure CIP, and track the number of lots with existing structures that are connected to sewer in the urbanized area	Completed	Maintain a five year Infrastructure CIP, and track the number of lots with existing structures that are connected to sewer in the urbanized area
3-7	MS4 Map	Comm. Dev./G.I.S.	Map additional outfalls in the urbanized areas as they are found or constructed	Completed	Map additional outfalls in the urbanized areas as they are found or constructed
3-8	Dry Weather Outfall Screening	Engineering	No activity scheduled	Ahead of schedule: Completed	Screen new outfalls in urbanized areas



Table 4. Construction Site Storm Water Runoff Control

BMP NO.	BMP DESCRIPTION	RESPONSIBLE DEPARTMENT	MEASURABLE GOALS PERMIT YEAR 4 (2010 - 2011)	PROGRESS ON GOALS PERMIT YEAR 4 (2010 - 2011)	PLANNED ACTIVITIES PERMIT YEAR 5 (2011 - 2012)
4-1	Construction Waste Enforcement under the Solid Waste Ordinance	Comm. Dev.	No further activities; superseded by BMP4-7 after adoption of Storm Water Mgmt Ordinance	Not applicable	No activity scheduled
4-2	Construction Plan Review	Engineering and Comm. Dev.	No further activities; superseded by BMP4-6 after adoption of Storm Water Mgmt Ordinance	Not applicable	No activity scheduled
4-3	Storm Water Management Ordinance	Engineering and Comm. Dev.	Track construction enforcement actions	Completed	Track construction enforcement actions
4-4	SWPPP and BMP Training for Plan Reviewers	Engineering	Train new reviewers and reviewers that missed year 3 training	Completed	Train new reviewers
4-5	Erosion and Sediment Control Training for Inspectors	Engineering and Comm. Dev.	Develop a written SWPPP inspection protocol	Delayed	Develop a written SWPPP inspection protocol
4-6	SWPPP Review	Engineering and Comm. Dev.	Require County review and acceptance of SWPPP for regulated sites before issuing County permits	Ahead of schedule: Completed	Require County review and acceptance of SWPPP for regulated sites before issuing County permits
4-7	Construction Site SWPPP Inspections	Engineering and Comm. Dev.	Inspect regulated construction sites within the urbanized areas at least once during construction	On schedule	Inspect regulated construction sites within the urbanized areas at least once during construction
4-8	Construction SWPPP Education	Engineering and Comm. Dev.	Develop hand-out of SWPPP requirements for contractors and developers; track distribution	Delayed	Develop hand-out of SWPPP requirements for contractors and developers; track distribution
4-9	Construction SWPPP Information on Webpage	Public Information	Maintain information on webpage, and track the number of "hits"	Delayed	Maintain information on webpage, and track the number of "hits"



Table 5. Post-Construction Storm Water Management

BMP NO.	BMP DESCRIPTION	RESPONSIBLE DEPARTMENT	MEASURABLE GOALS PERMIT YEAR 4 (2010 - 2011)	PROGRESS ON GOALS PERMIT YEAR 4 (2010 - 2011)	PLANNED ACTIVITIES PERMIT YEAR 5 (2011 - 2012)
5-1	Vision 2040 Regional Plan	Comm. Dev.	Document activities related to One Valley, One Vision 2040	Completed	Document activities related to One Valley, One Vision 2040
5-2	Evaluation of Existing Ordinances	Comm. Dev. And Engineering	No activity scheduled	Not applicable	Prepare list of ordinance changes for post-construction BMPs
5-3	LID Information on Webpage	Public Information	Maintain information; track number of "hits"	Completed	Maintain information; track number of "hits"
5-4	LID Education	Comm. Dev. and Engineering	GI/LID conference on August 26, 2010	Ahead of Schedule: Completed	No activity scheduled
5-5	Post-Construction BMP Training for Plan Reviewers	Comm. Dev. and Engineering	No activity scheduled	Completed	Train new reviewers
5-6	Plan Review for Compliance with Development Design Standards	Comm. Dev. and Engineering	Review development plans in urbanized areas to verify they contain post-construction BMPs; track number and type of BMPs	Completed	Review development plans in urbanized areas to verify they contain post-construction BMPs; track number and type of BMPs
5-7	Construction Inspection for Compliance with Development Plans	Comm. Dev. and Engineering	Track number of inspections and enforcement actions within urbanized areas	In progress	Track number of inspections and enforcement actions within urbanized areas
5-8	Maintenance Agreement for Private Drainage Structures	Comm. Dev.	Signed maintenance agreement before approval of final plat for developments with private structures in the urbanized areas	Completed	Signed maintenance agreement before approval of final plat for developments with private structures in the urbanized areas
5-9	LID Principles in Designs for New County Facilities	Engineering	No activity scheduled	Not applicable	Include clause in service contracts that requires AEs to evaluate feasibility of LID features, and maintain list of LID features implemented



Table 6. Pollution Prevention/Good Housekeeping for Municipal Operations

BMP NO.	BMP DESCRIPTION	RESPONSIBLE DEPARTMENT	MEASURABLE GOALS PERMIT YEAR 4 (2010 - 2011)	PROGRESS ON GOALS PERMIT YEAR 4 (2010 - 2011)	PLANNED ACTIVITIES PERMIT YEAR 5 (2011 - 2012)
6-1	Roadway Cleaning	Roads	Track lane miles swept within urbanized areas and amount of debris collected	Delayed	Track lane miles swept within urbanized areas and amount of debris collected
6-2	Road Culvert Maintenance	Roads	Track number of culverts inspected in urbanized areas and amount of debris collected	Delayed	Track number of culverts inspected in urbanized areas and amount of debris collected
6-3	Storm Inlet/Outlet Maintenance	Roads	Track number of inlet/outlet structures inspected within the urbanized areas and amount of debris removed	Delayed	Track number of inlet/outlet structures inspected within the urbanized areas and amount of debris removed
6-4	Storm Drain Pipe Maintenance	Roads	Track linear feet of pipes inspected and cleaned within the urbanized areas and amount of debris removed	Delayed	Track linear feet of pipes inspected and cleaned within the urbanized areas and amount of debris removed
6-5	Waste Management	Roads	No activity scheduled for year 4	Not applicable	Develop written Standard Operating Procedures for storage, hauling and disposal of sediment/debris removed from streets/drainage system
6-6	Licensing of County Applicators	Facilities & Parks	License/certify all County applicators	Completed	Limit pesticide/herbicide use to licensed applicators
6-7	Xeriscaping	Facilities & Parks	Where appropriate, new or replacement landscaping at County facilities is native and adapted plants	Completed	Where appropriate, new or replacement landscaping at County facilities is native and adapted plants
6-8	Trash Pick-up at Park Facilities	Facilities & Parks	Maintain regular trash collection, and track the volume collected	Completed	Maintain regular trash collection, and track the volume collected
6-9	Spill Cleanup Kits	Fleet & Sheriff's Office	Maintain spill cleanup kit in each County maintenance facility	Completed	Maintain spill cleanup kit in each County maintenance facility
6-10	Drip Pan Usage	Fleet & Sheriff's Office	Daily inspection and use of drip pans under vehicles awaiting repair at maintenance facilities	In progress	Daily inspection and use of drip pans under vehicles awaiting repair at maintenance facilities



BMP NO.	BMP DESCRIPTION	RESPONSIBLE DEPARTMENT	MEASURABLE GOALS PERMIT YEAR 4 (2010 - 2011)	PROGRESS ON GOALS PERMIT YEAR 4 (2010 - 2011)	PLANNED ACTIVITIES PERMIT YEAR 5 (2011 - 2012)
6-11	Good Housekeeping for Vehicle Maint. Facilities	Fleet & Sheriff's Office	Revise plan as needed based on results of BMP6-12	In progress	Complete plan for Sherriff's facility; revise plan as needed based on results of BMP6-12
6-12	Inspection of Vehicle Maint. Facilities	Fleet & Sheriff's Office	Develop an inspection form, and perform quarterly inspections of the vehicle maintenance facilities	On Schedule: Fleet completed and Sheriff's pending	Complete inspection form for Sherriff's facility; perform quarterly inspections
6-13	Minimization of Material Exposure	Roads & Facilities & Parks	Develop and maintain an inventory of materials stored outside	Completed	Update inventory of materials stored outside
6-14	Good Housekeeping for County Operations	Roads & Facilities & Parks	Prepare and implement written good housekeeping procedures for materials stored outside	Completed	Revise procedures as needed based on results of BMP6-13
6-15	Storm Water Pollution Prevention Training	Roads, Fac. & Parks, Utilities, Comm. Dev., and Sheriff's Office	Train all employees who work outside	In progress	Train all employees who work outside
6-16	Facility BMP Training	Fleet, Roads, Facilities & Parks, and Sheriff's Office	Maintain a training log-in sheet showing that employees who are responsible for implementing BMPs are trained annually	In progress	Maintain a training log-in sheet showing that employees who are responsible for implementing BMPs are trained annually
6-17	SWPPPs for County Projects	Engineering, Flood Commission and Utilities	Develop, implement, and inspect SWPPPs for County projects covered by the CGP	Completed	Develop, implement, and inspect SWPPPs for County projects covered by the CGP
6-18	Water Quality Criteria for County Flood Control and Drainage Projects	Engineering and Flood Commission	Include requirement in engineering services contracts to do a downstream assessment for erosion potential and evaluate water quality improvements before design reaches 50%	In progress	Include requirement in engineering services contracts to do a downstream assessment for erosion potential and evaluate water quality improvements before design reaches 50%



3.2 TOTAL MAXIMUM DAILY LOADS

Portions of the County's MS4 discharge to the Main Stem of the Lower Rio Grande, which is on the State of New Mexico's Clean Water Act Section 303(d) list of impaired waters due to bacteria. On June 11, 2007, an EPA-Approved Total Maximum Daily Load (TMDL) was issued for the Main Stem of the Lower Rio Grande. The New Mexico Environment Department used the indicator organism *Escherichia coli* (*E. coli*) to establish the TMDL and Waste Load Allocations (WLA). The allocation for storm water discharges was based on the percent jurisdictional area approach, resulting in two percent of the WLA being allocated to Small MS4s.

Control of bacterial pollutants is a water quality priority for Doña Ana County. The County's SWMP contains several BMPs to address sources of bacteria (BMP1-4, BMP1-6, BMP1-8, and BMP3-6). At this time, additional BMPs are not needed to comply with the TMDL.

In the next permit year, the County plans to implement a monitoring program, as described in its Monitoring/Assessment Plan, to collect data on the MS4 contribution to the bacteria load. BMPs will be modified in the future, if necessary, based on results of the monitoring.

3.3 COMPLIANCE SUMMARY

Table 7 summarizes the County's status in complying with its SWMP's measurable goals and schedule last year.

Table 7. Summary of BMP Implementation

DESCRIPTION	RESULT
BMPs Completed or On Schedule	36
BMPs Delayed or In Progress but Behind Schedule	19
BMPs Completed Ahead of Schedule	3
BMPs Superseded by Others and No Longer Applicable	2
TOTAL	60

In the 2010 Small MS4 Annual Report, the County reported 88% of the BMPs (53 of 60) as completed, on schedule, or ahead of schedule at the end of the third permit year. The percentage dropped to 68% at the end of the fourth permit year, as shown in Table 7 (41 of 60). This drop is due to the County's fiscal challenges and limited resources during the current economic climate in the United States.

The County is in the fifth and final year of the current NPDES General Permit for Small MS4s. Many of the BMPs not completed last year are already in the process of being implemented. The County plans to fully implement its SWMP before the end of the five year permit term.

During the next year, the County will look for reissuance of the general permit by the EPA. After it is issued, Doña Ana County will update its SWMP for the next five year permit and will submit the revised SWMP and/or a new Notice of Intent to the EPA according to the requirements of the new general permit.



4.0 PROPOSED SWMP CHANGES

The changes in this section are proposed according to Part 5.5.2 of the NPDES General Permit for Small MS4s. EPA is hereby notified of the proposed changes, which the permit allows to be implemented 60 days after submitting this report, unless denied in writing by the EPA.

4.1 RESPONSIBLE DEPARTMENTS

The SWMP shows the Department of Public Works (DPW) as the responsible department for a majority of BMPs. The BMPs have been executed by several divisions of DPW, including Engineering, Fleet, Roads, and Facilities & Parks. During the fourth permit year, Doña Ana County eliminated the DPW but retained its divisions (e.g. engineering). The divisions, now called departments, report directly to the Assistant County Manager. This change in organizational structure is shown in the responsible departments listed in Compliance Summary Tables 1 through 6. The County proposes to modify the responsible departments in SWMP Tables 1 through 6 accordingly.

The County's Utilities Department (not part of DPW) is listed in the SWMP as one of the responsible departments for BMP6-13, BMP6-14, and BMP6-16. All of the Utilities Department's material storage activities that would be subject to these BMPs occur at the South Central Regional Waste Water Treatment Plant (SCR WWTP). During the fourth permit year, the SCR WWTP prepared and implemented a Storm Water Pollution Prevention Plan as required by the NPDES Multi-Sector General Permit for storm water discharges from industrial activities. The County filed an NOI for the SCR WWTP and received MSGP coverage effective December 27, 2010, under NPDES Tracking Number NMR05H621. The industrial SWPPP addresses the same activities intended to be addressed by SWMP BMP6-13, BMP6-14, and BMP6-16. The County proposes to remove the Utilities Department as a responsible department for these BMPs. The BMPs are still applicable to Roads and Facilities & Parks Departments.

4.2 EVALUATION OF EXISTING ORDINANCES (BMP5-2)

BMP5-2 is a review of the County's development ordinances and creation of a list of recommended changes to implement post-construction BMPs based on the vision and objectives in the One Valley, One Vision 2040 Regional Comprehensive Plan. BMP5-2 is therefore dependent on completion of the regional plan. When the County's SWMP was developed and submitted to the EPA in 2009, the regional plan was scheduled to be completed before the end of the third permit year.

Completion of the regional plan has been delayed approximately two years by forces beyond the County's control. The plan's progress is dependent on the timely participation of numerous municipalities and entities within the region. The regional planning process is currently scheduled to be completed next permit year, which leaves no time to implement BMP5-2 before the end of the permit year. The County proposes to dedicate the resources that would have been used for BMP5-2 next year to the completion of One Valley, One Vision 2040 (BMP5-1). The County also proposes to change the start of BMP5-2 to the first full permit year after the Board of County Commissioners adopts the regional plan.



5.0 PUBLIC REVIEW AND COMMENT

On August 28, 2011, Dona Ana County published a public notice in the Las Cruces Sun-News stating that the draft annual report was available for public review. A copy of the public notice is in Appendix G. No public comments were received.

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PUBLIC EDUCATION AND OUTREACH (MCM #1)
PUBLIC INVOLVEMENT/PARTICIPATION (MCM #2)



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1.0 INTRODUCTION

Doña Ana County is authorized by the NPDES General Permit for Discharges from Small Municipal Separate Storm Sewer Systems (MS4s) to discharge storm water from its MS4 in the Las Cruces and El Paso Urbanized Areas. The authorization is dependent on the County complying with the conditions of the permit. Part 5.8 of the General Permit for Small MS4s requires the County to submit an annual report to the EPA.

This document reports the County's progress towards meeting the goals of the first and second Minimum Control Measures (MCM) required by the permit: **Public Education and Outreach and Public Involvement/Participation**. The entire report consists of the following documents placed on compact disks (CDs) for submission to the EPA:

- Report certification
- CD #1 – Compliance Summary
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- CD #3 – Illicit Discharge Detection and Elimination
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- CD #5 – Pollution Prevention/Good Housekeeping for Municipal Operations
- CD #6 – Appendices

2.0 MS4 INFORMATION

The following information is provided for EPA's tracking purposes.

NPDES Tracking No.:	NMR04L003
MS4 Permittee Name:	Doña Ana County
Address:	845 N. Motel Blvd, Las Cruces, NM 88007
Point of Contact:	Henry K. Corneles, PE, Engineer Supervisor
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3.0 ASSESSMENT OF BEST MANAGEMENT PRACTICES

3.1 PUBLIC EDUCATION AND OUTREACH

During the past year, the County's most significant accomplishments in public education and outreach were:

- Printing and distributing an educational fact sheet on urban runoff;
- Becoming active in the Clean Water Act Section 319 activities of the Paso del Norte Watershed Council (PdNWC); and
- Working with the PdNWC to distribute a brochure on bacteria in the Rio Grande.

Table 1 summarizes the status of the County's BMPs for public education and outreach. It is followed by subsections that describe the status of each BMP in greater detail.



Table 1*. Public Education and Outreach

BMP NO.	BMP DESCRIPTION	RESPONSIBLE DEPARTMENT	MEASURABLE GOALS PERMIT YEAR 4 (2010 - 2011)	PROGRESS ON GOALS PERMIT YEAR 4 (2010 - 2011)	PLANNED ACTIVITIES PERMIT YEAR 5 (2011 - 2012)
1-1	Public Education with Printed Material	Engineering	Develop or obtain one educational item and track distribution	Completed	Develop or obtain one educational item and track distribution
1-2	Public Education by Radio	Public Information	Quarterly address storm water issues on a County radio show Broadcast two PSAs in Spanish, one as scheduled and one to make up for Year 3	In progress Delayed	Quarterly address storm water issues on a County radio show Broadcast two PSAs in Spanish
1-3	Storm Water Mgmt Webpage	Public Information	Review and update the webpage, and track the number of "hits"	Completed	Review and update the webpage, and track the number of "hits"
1-4	Pollution Prevention Information for Animal Owners	Engineering and Sheriff's Office/Animal Control	Develop fact sheet or brochure, and track distribution	Delayed	Develop fact sheet or brochure, and track distribution
1-5	Pollution Prevention Information for Auto Repair Shops and Recyclers	Engineering and Comm. Dev.	No activity scheduled	Not applicable	Develop fact sheet or brochure, and track distribution to new businesses
1-6	Pet Waste Signs at Parks	Facilities & Parks	Install signs at 2 parks	Delayed	Install signs at 4 parks, 2 for 2012 and 2 to make up for 2011
1-7	Elementary School Presentations with City of Las Cruces	Engineering	Meet with the City of Las Cruces and discuss opportunities to assist with presentations	Completed	Meet with the City of Las Cruces and discuss opportunities to assist with presentations
1-8	Watershed-based Education on Bacteria Sources	Engineering	Participate in a minimum of four Paso Del Norte Council's activities for its Section 319(h) Watershed Restoration Grant	Completed	Participate in a minimum of four Paso Del Norte Council's activities for its Section 319(h) Watershed Restoration Grant
1-9	Outreach to Gadsden ISD	Engineering	Continue discussion with Gadsden ISD and determine feasibility of outreach program	On schedule	Determine feasibility of a storm water outreach program for the Gadsden ISD

*Table 1 is the same as Table 1 in the Annual Report Compliance Summary.



3.1.1 Public Education with Printed Material (BMP1-1)

The goal of this BMP is to use printed materials to inform the residents of Doña Ana County about the ways they affect storm water quality and to encourage them to change their behavior. One printed item is scheduled to be developed or purchased by the County each year. During the fourth permit year, the County printed 140 copies of EPA 841-F-03-003, "*Protecting Water Quality from Urban Runoff.*" A copy of the fact sheet is in Appendix A.

The County personalized the EPA fact sheet by placing a label with the County's storm water contact information in the margin of the fact sheet before distribution. Seventy copies of the fact sheet were placed in the County Government Center for citizens to pick up, of which 46 were gone by the end of the permit year. Another 70 copies of the fact sheet were distributed to the following recreation centers: Rincon, Radium Springs, Doña Ana, Organ, Vado/Del Cerro, and Chaparral. Fifty-seven of the fact sheets were picked up by visitors at the recreation centers before the end of the permit year.

On June 21-22, 2010 (near the end of the third permit year), 500 copies of EPA 833-B-03-002, "*After the Storm: A Citizens Guide to Understanding Stormwater,*" were distributed to four locations in the County Government Center and the following community centers around the County: Anthony, Betty McKnight, Butterfield, Chaparral, Del Cerro, Dolores Wright, Doña Ana County Center, La Mesa, Mesquite, Organ, Placitas, Radium Springs, and Rincon. All 500 brochures were picked up during the fourth permit year. The County also distributed approximately 200 copies of the brochure at the regional Green Infrastructure Conference on August 26, 2010 (BMP5-4).

In the fifth permit year, the County is scheduled to develop or obtain another educational item for distribution and will continue tracking the distribution of printed material.

3.1.2 Public Education by Radio (BMP1-2)

Educational information by radio is intended to reach a residential audience and commuters between the two urbanized areas within the County. The goals for last year were to quarterly address storm water issues on radio talk shows and to broadcast two pollution prevention Public Service Announcements (PSAs) for the Spanish-speaking citizens of Doña Ana County.

The Director of Public Information provides weekly updates of the County's activities on KVLC 101-Gold Radio, the HOT FM 103.1 *Morning Show*, and the *KGRT Morning Country Show* on KGRT 103.9. Throughout last year, the Director regularly announced on the radio shows that the SWMP was posted on the County's website for public review.

No PSAs were broadcast last year. Two PSAs will be broadcast in Spanish during the next permit year, instead of one as was originally scheduled in the SWMP. The SWMP Coordinator will provide the information for the PSAs, and the Public Information Office will be responsible for preparing/recording the PSAs in Spanish and broadcasting them.



3.1.3 Storm Water Management Webpage (BMP1-3)

The County continues to maintain the storm water management webpage on its website. A copy of the webpage is in Appendix A. During last year, the County added a link with information on Household Hazardous Waste disposal (BMP3-2) and a questionnaire about the SWMP. The storm water management webpage was visited 905 times last year. The County will continue to update and track visits to the webpage.

3.1.4 Pollution Prevention Information for Animal Owners (BMP1-4)

Animal owners are one of the audiences targeted for public education in the County's SWMP, since their animals are potential bacteria sources contributing to impairment of water quality in the Lower Rio Grande. During the fourth permit year, the County was scheduled to purchase or develop a fact sheet about animal waste and track its distribution to animal owners. This BMP was delayed to the fifth permit year.

3.1.5 Pollution Prevention Information for Auto Repair Shops and Recyclers (BMP1-5)

During permit year five, the County will target auto repair shops and auto recyclers. These commercial activities are a potential source of pollutants in the unincorporated areas of the County. The County will develop or purchase a fact sheet addressing pollutants discharged by these commercial activities. New businesses will be given the fact sheet when they receive their business certificate. No activities were scheduled for this BMP during the past year.

3.1.6 Pet Waste Signs at Parks (BMP1-6)

The target audience for BMP1-6 is dog owners who use County parks to walk, exercise, and play with their dogs. The goal is to reduce the potential bacteria loading from dog waste by installing signs that encourage dog owners to pick up their dog's waste.

Beginning last year, the County was scheduled to place signs in two parks per year until all the County parks have signs; however, sign installation was delayed until the fifth permit year. The County installed four signs before submission of this report, two of which were delayed from the fourth permit year and two for the fifth permit year. The signs were installed at Dolores Wright Park, Mesquite Community Park, Guadalupe Park, and La Mesa Baseball Park. Photos of the signs are in Appendix A.

3.1.7 Elementary School Presentations with City of Las Cruces (BMP1-7)

For several years, the City of Las Cruces has presented a hydrologic cycle and storm water pollution prevention program to students at elementary schools in the Las Cruces Public School District. Henry Corneles, the County's point of contact for storm water public education, met with Peter Bennett, the City of Las Cruces SWMP coordinator, to discuss cooperating on the school presentations. An opportunity for the County to participate did not present itself last year. Next year the County will continue to meet with the City and discuss opportunities for cooperation on school presentations.



3.1.8 Watershed-based Education on Bacteria Sources (BMP1-8)

The County's watershed-based education goal for the past year was to participate in at least four activities of the Paso del Norte Watershed Council (PdNWC) and its CWA Section 319(h) Water Quality Subcommittee. On April 14, 2011, Henry Corneles, the County's point of contact for storm water public education, met with Brian Hanson, the PdNWC Watershed Coordinator for the CWA Section 319(h) Watershed Restoration Grant. Peter Bennett, the City of Las Cruces SWMP coordinator and a member of the PdNWC Executive Committee, also attended the meeting. The participants discussed ways to cooperate on public education related to bacteria in the Lower Rio Grande.

The County received over 500 copies of the brochure "*Bacteria in the Rio Grande Basin*," which was developed by the CWA Section 319(h) Water Quality Subcommittee. Copies of the brochure were placed in the County Government Center for citizens to pick up, 61 of which were gone before the end of the permit year. Seventy copies of the brochure were also placed in the following recreation centers: Rincon, Radium Springs, Doña Ana, Organ, Vado/Del Cerro, and Chaparral. Visitors picked up 64 of the brochures at the recreation centers before the end of the permit year. The County will continue to distribute the brochure during the fifth permit year.

County staff attended the PdNWC meeting on January 14, 2011 and the PdNWC 319 Stakeholder Workgroup meeting on April 7, 2011. Minutes and meeting notes documenting their participation are in Appendix A. County staff also attended the Water Quality Subcommittee meeting on June 10, 2011. The water quality model to evaluate bacteria BMPs for the Lower Rio Grande was presented at the June 10th meeting; however, meeting minutes were not available in time to include in this report.

The County will continue its participation in the regional activities of the Paso del Norte Watershed Council during the next permit year. The PdNWC has asked the County to join the PdNWC Executive Committee. Approval of the County's participation is on the Board of County Commissioners meeting agenda for September 27, 2011.

3.1.9 Outreach to Gadsden ISD (BMP1-9)

The schedule in the County's SWMP shows outreach to the Gadsden ISD starting in the fifth permit year. The County contacted the Gadsden ISD superintendent's office during the third permit year, ahead of schedule. The Gadsden ISD expressed interest; however, no further action has occurred. The County will follow-up with the Gadsden ISD during next permit year, as scheduled, and will determine if an outreach program is feasible.

3.2 PUBLIC INVOLVEMENT/PARTICIPATION

During the past year, the County's most significant accomplishment in public involvement and participation was having more than 1,600 people participate in volunteer cleanup activities.

Table 2 summarizes the status of the County's BMPs for public involvement/participation. It is followed by subsections that describe the status of each BMP in greater detail.



Table 2*. Public Involvement/Participation

BMP NO.	BMP DESCRIPTION	RESPONSIBLE DEPARTMENT	MEASURABLE GOALS PERMIT YEAR 4 (2010 - 2011)	PROGRESS ON GOALS PERMIT YEAR 4 (2010 - 2011)	PLANNED ACTIVITIES PERMIT YEAR 5 (2011 - 2012)
2-1	Presentations to the Board of County Commissioners (BOCC)	Engineering	Present the 2009-2010 Annual Report to the BOCC	Completed	Present the 2010-2011 Annual Report to the BOCC
2-2	NOI and SWMP on Storm Water Webpage	Public Information	Add link to 2010 Annual Report	Delayed	Add link to 2010 and 2011 Annual Reports
2-3	Webpage Comment Form for the SWMP	Public Information	Track number of forms received and the County's response	Completed	Track number of forms received and the County's response
2-4	Maintain a Copy of the NOI and SWMP for Public Viewing	Engineering	Place a copy of the 2010 annual report with the SWMP for public viewing	Completed	Place a copy of the 2011 annual report with the SWMP for public viewing
2-5	Public Comment Log	Engineering	Continue to maintain the record	Completed	Continue to maintain the record
2-6	Storm Water Pollution Report Line	Engineering, Utilities and Sheriff's Office/Codes	Establish procedures for documenting, tracking, processing, and responding to the calls; track number and types of calls	Delayed	Establish procedures for documenting, tracking, processing, and responding to the calls; track number and types of calls
2-7	Volunteer Cleanup Activities	Engineering, Utilities and Sheriff's Office/Codes	Track the number of clean-up activities and amount of trash collected	Completed	Track the number of clean-up activities and amount of trash collected

*Table 2 is the same as Table 2 in the Annual Report Compliance Summary.



3.2.1 Presentations to County Commissioners (BMP2-1)

The goal of this BMP is to bring the SWMP to the Board of County Commissioners (BOCC) at least once per year in a forum where the Commissioners and the general public can comment on the SWMP activities. An update on the status of the SWMP was presented to the BOCC on June 28, 2011. The presentation is Item 3 (highlighted) in the BOCC Regular Meeting Minutes in Appendix B. Although the floor was open to public comments, no one spoke.

3.2.2 NOI and SWMP on Storm Water Management Webpage (BMP2-2)

Easy public access to information is important for public involvement. As reported last year, the County's NOI and SWMP have been posted on the County's storm water management webpage. In permit year four, the County was scheduled to post a link to the 2010 Small MS4 Annual Report, but this action did not occur. Links to both the 2010 and 2011 reports will be established on the webpage within a month of the 2011 report's submission to the EPA.

3.2.3 Webpage Comment Form for the SWMP (BMP2-3)

The County's storm water management webpage includes a form where the public can provide comments and feedback on the SWMP. Only one comment form was received last year. A copy of the comment is in Appendix B. The comment did not require a response from the County.

3.2.4 Maintain a Copy of the NOI and SWMP for Public Viewing (BMP2-4)

During the past year, the County maintained a copy of its NOI, SWMP, and 2010 Small MS4 Annual Report for public viewing in the Engineering Department at the County Government Center. There were no requests to view these documents. A copy of the 2011 Small MS4 Annual Report will be added to the documents for viewing in the next year.

3.2.5 Public Comment Log (BMP2-5)

The public comment log is intended to be a master set of all comments received on the SWMP during the five year term of the MS4 general permit. Only one comment was received during the reporting period. Refer to BMP2-3.

3.2.6 Storm Water Pollution Report Line (BMP2-6)

The County has established the Engineering Department phone number (575-525-6164) as the public report line for storm water pollution. The number is on the County's storm water management webpage and is placed on educational material. The goal for BMP2-6 during the fourth permit year was to establish a system to track the number and types of reports received on the report line and the County's response to the report. This activity was delayed until next permit year.



3.2.7 Volunteer Cleanup Activities (BMP2-7)

In the fourth permit year, Doña Ana County provided several opportunities for residents to participate in litter cleanups through the Trek for Trash and Great American Cleanup events. Many volunteer organizations also offer their time for litter cleanup. Reports on the Trek for Trash and the Great American Cleanup events are in Appendix B. Totals for litter cleanup in the County are presented in Table 3.

Table 3. Summary of Litter Cleanup Activities

TYPE OF ACTIVITY	LITTER COLLECTED (POUNDS)	NUMBER OF VOLUNTEERS
Great American Cleanup	51,100	266
Trek For Trash	45,770	442
Volunteer Organizations	127,395	978
TOTALS	224,264	1,686

4.0 ANALYSIS OF MONITORING DATA

4.1 PUBLIC EDUCATION AND OUTREACH

The Monitoring/Assessment Plan for public education and outreach is to:

- Use results from a storm water questionnaire to monitor the public’s knowledge of storm water pollution prevention; and
- Quarterly collect floatables (trash) at one location in each urbanized area to monitor behavior changes in response to public education.

The Doña Ana County Storm Water Questionnaire was developed last year. A copy of the questionnaire is at the end of Appendix A. The questionnaire was distributed near the end of the fourth permit year, so insufficient data is available for analysis at this time. The County posted a link to the questionnaire in electronic format on the storm water management webpage (Appendix A). Copies of the questionnaire were also placed in the County Government Center and at County recreation centers for the public to complete and submit. Analysis of data from the questionnaires will start with next year’s report.

The County selected a series of grated drop inlets along Concepcion Avenue in Berino, NM for monitoring in the El Paso Urbanized Area and a storm water pond in Tortugas, NM for monitoring in the Las Cruces Urbanized Area. The County is in the process of evaluating trash collection devices and developing monitoring protocols for the two locations. Monitoring of floatables will be implemented during the fifth permit year.



4.2 PUBLIC INVOLVEMENT/PARTICIPATION

The Monitoring/Assessment Plan for public involvement/participation is to:

- Track the number of storm water pollution reports received from the public to monitor the number of people aware of and becoming involved in storm water pollution prevention; and
- Track the number of people commenting on the SWMP to monitor involvement in the program.

Development of the procedures to track storm water pollution reports (BMP2-6) was delayed last year. Monitoring of reports will begin after the BMP is implemented.

Table 4 summarizes the comments about the SWMP that the County has received. To date, the data seems to indicate either a lack of knowledge of or interest in the SWMP. During the fifth permit year, the County will track the number of visits to the SWMP on its website. If the SWMP is viewed but no comments are submitted, it could indicate a lack of interest by the public. If the SWMP is not viewed a significant number of times, it may indicate a need for greater promotion of the SWMP, as resources allow.

Table 4. Summary of Public Comments on the SWMP

PERMIT YEAR	TIME PERIOD	NUMBER OF COMMENTS RECEIVED
Third	July 2009 – June 2010	0
Fourth	July 2010 – June 2011	1
TOTAL		1

DOÑA ANA COUNTY
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NPDES TRACKING NO. NMR04L003
JULY 1, 2010 – JUNE 30, 2011

ILLICIT DISCHARGE DETECTION AND ELIMINATION
(MCM #3)



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1.0 INTRODUCTION

Doña Ana County is authorized by the NPDES General Permit for Discharges from Small Municipal Separate Storm Sewer System (MS4) to discharge storm water from its MS4 in the Las Cruces and El Paso Urbanized Areas. The authorization is dependent on the County complying with the conditions of the permit. Part 5.8 of the General Permit for Small MS4s requires the County to submit an annual report to the EPA.

This document reports the County's progress towards meeting the goals of the third Minimum Control Measure (MCM) required by the permit: **Illicit Discharge Detection and Elimination**. The entire report consists of the following documents placed on compact disks (CDs) for submission to the EPA:

- Report certification
- CD #1 – Compliance Summary
- CD #2 – Public Education and Outreach and Public Involvement/Participation
- CD #3 – Illicit Discharge Detection and Elimination
- CD #4 – Construction Site Storm Water Runoff Control and Post-Construction Storm Water Management in New and Redevelopment
- CD #5 – Pollution Prevention/Good Housekeeping for Municipal Operations
- CD #6 – Appendices

2.0 MS4 INFORMATION

The following information is provided for EPA's tracking purposes.

NPDES Tracking No.:	NMR04L003
MS4 Permittee Name:	Doña Ana County
Address:	845 N. Motel Blvd, Las Cruces, NM 88007
Point of Contact:	Henry K. Corneles, PE, Engineer Supervisor
Phone Number:	575-525-6162
Fax Number:	575-525-6179
E-mail:	henryco@donaanacounty.org

3.0 ASSESSMENT OF BEST MANAGEMENT PRACTICES

During the past year, the County's most significant accomplishments in illicit discharge detection and elimination were:

- Distributing information about where residents can properly dispose of Household Hazardous Waste;
- Issuing 53 citations for illegal dumping, an increase of 89%; and
- Initiating enforcement of the discharge prohibitions in the new Storm Water Management Ordinance

Table 1 summarizes the status of the County's BMPs for illicit discharge detection and elimination. It is followed by subsections that describe the status of each BMP in greater detail.



Table 1*. Illicit Discharge Detection and Elimination

BMP NO.	BMP DESCRIPTION	RESPONSIBLE DEPARTMENT	MEASURABLE GOALS PERMIT YEAR 4 (2010 - 2011)	PROGRESS ON GOALS PERMIT YEAR 4 (2010 - 2011)	PLANNED ACTIVITIES PERMIT YEAR 5 (2011 - 2012)
3-1	Public Information on Trash and HHW Disposal	Public Information	Develop fact sheet or brochure; place in dispensers at County buildings; track distribution	Completed	Track distribution
3-2	HHW Disposal Guidance on the Website	Public Information	Maintain information about HHW disposal on website, and track number of "hits"	Completed	Maintain information about HHW disposal on website, and track number of "hits"
3-3	Illegal Dumping Enforcement	Sheriff's Office/Codes	Track number of citations issued	Completed	Track number of citations issued
3-4	Storm Water Management Ordinance	Engineering and Sheriff's Office/Codes	Track illicit discharge enforcement actions	Completed	Track illicit discharge enforcement actions
3-5	Illicit Discharge Training	Engineering, Sheriff's Office and Comm. Dev.	Train illicit discharge inspectors	Delayed	Train illicit discharge inspectors
3-6	Wastewater Collection for Areas with On-site Systems	Utilities	Maintain a five year Infrastructure CIP, and track the number of lots with existing structures that are connected to sewer in the urbanized area	Completed	Maintain a five year Infrastructure CIP, and track the number of lots with existing structures that are connected to sewer in the urbanized area
3-7	MS4 Map	Comm. Dev./G.I.S.	Map additional outfalls in the urbanized areas as they are found or constructed	Completed	Map additional outfalls in the urbanized areas as they are found or constructed
3-8	Dry Weather Outfall Screening	Engineering	No activity scheduled	Ahead of schedule: Completed	Screen new outfalls in urbanized areas

*Table 1 is the same as Table 3 in the Annual Report Compliance Summary.



3.1 Public Information on Trash and HHW Disposal (BMP3-1)

In permit year four, the County developed, "*Household Hazardous Waste Disposal in Doña Ana County.*" The fact sheet provides a list of HHW and locations where residents can take HHW for proper disposal. A copy of the fact sheet is in Appendix C. The fact sheet was placed in the County Government Center for citizens to pick up and was distributed to the following recreation centers: Rincon, Radium Springs, Doña Ana, Organ, Vado/Del Cerro, and Chaparral. The County will track the distribution of the information during the fifth permit year.

3.2 HHW Disposal Guidance on the Website (BMP3-2)

When the County established its storm water management webpage two years ago, it included a link to the "*List of Products in the Virtual House,*" copyrighted by Purdue Research Foundation. The site provides a room by room listing of household hazardous wastes and proper disposal procedures. The site received five visits in the third permit year. The number of visits increased to 78 during the fourth permit year. In the fourth permit year, the County added a link to "*Household Hazardous Waste Disposal in Doña Ana County,*" which was developed for BMP3-1. A copy of the webpage with the HHW links is in Appendix C.

3.3 Illegal Dumping Enforcement (BMP3-3)

In permit year four, the County issued 53 citations for illegal dumping. Other illegal dumping sites were found, but the County could not determine the source of the dumping to implement enforcement and clean-up actions. Instead, these sites were referred to the County's Keep America Beautiful program for clean-up. In permit year five, the County will continue to enforce the ordinances that prohibit illegal dumping and track the number of citations issued.

3.4 Storm Water Management Ordinance (BMP3-4)

The Board of County Commissioners adopted a Storm Water Management Ordinance on April 27, 2010. During the past year, the County started to enforce the illicit discharge prohibitions in section 6 and 7 of the new ordinance. The Codes Enforcement Unit issued citations for two sewage/septic discharge violations and three rubble, concrete, and/or building material discharge violations. All five actions are pending in magistrate court at the time of this report.

The County's Construction Inspectors are also authorized to enforce the illicit discharge prohibitions. Last year they issued one warning notice for the discharge of water from the washout of a commercial concrete truck. A copy of the warning is in Appendix C.

3.5 Illicit Discharge Training (BMP3-5)

During the fourth permit year, the County was scheduled to start annual training of the employees who are responsible for enforcing the prohibitions on illicit discharges in the Storm Water Management Ordinance; however, the training was delayed until next year. The training will cover:

- Identifying different types of illicit discharges;
- Recognizing authorized discharges;
- Remedies authorized by the ordinance;
- Enforcement escalation procedures; and



- Methods to obtain remediation of damages caused by illicit discharges.

3.6 Wastewater Collection for Areas with On-site Systems (BMP3-6)

The County maintains a five year Capital Improvement Program to extend wastewater collection and treatment services to developments currently using on-site systems. Property owners are required by County Ordinance No. 201-02 to connect to the wastewater system when it is extended to within 300 ft of buildings or other facilities. The number of projects constructed is limited by funding resources. The County aggressively seeks and pursues Federal grants and other funding sources for wastewater collection.

No new wastewater collection lines were constructed during the past year. However, the County solicited bids for the next phase of a project to extend wastewater collection service to two additional streets within the community of Chaparral. It will be awarded and constructed during the fifth permit year.

3.7 MS4 Map (BMP3-7)

To the best of its knowledge, the County mapped all outfalls in the Las Cruces and El Paso Urbanized Areas during the third permit year. BMP3-7 was completed one year ahead of schedule. Last year's goal for BMP3-7 was modified to reflect this progress. The goal for last year (the fourth permit year) was to map any new outfalls that were found or constructed. There were none; therefore, the outfall maps submitted with the 2010 Small MS4 Annual Report have not changed.

3.8 Dry Weather Outfall Screening (BMP3-8)

BMP3-8 was completed ahead of schedule with BMP3-7. Outfall screening was not scheduled to be completed until the end of the fifth permit year. Instead, all known outfalls were screened when they were mapped during the third permit year, which was two years ahead of schedule. There was no activity scheduled for BMP3.8 last year. New outfalls will be screened as they are identified or constructed in the urbanized areas.

4.0 ANALYSIS OF MONITORING DATA

The Monitoring/Assessment Plan for illicit discharge detection and elimination is to:

- Track the number of enforcement actions for each type of enforcement authorized by the Storm Water Management Ordinance to monitor effectiveness of the County's illicit discharge detection program;
- Track the percentage of enforcement actions that result in elimination of the illicit discharge;
- Track the number of illicit discharges found by dry weather screening to assess the effectiveness of the screening program; and
- Track the percentage of illicit discharges found by dry weather screening that are eliminated by the program.

The Monitoring/Assessment Plan scheduled monitoring of illicit detection and elimination to start next year, during the fifth permit year. Since BMPs 3-7 and 3-8 were completed ahead of



schedule during the third permit year, data for dry weather screening was reported in the 2010 Small MS4 Annual Report. No new outfalls were identified this past year; therefore, the County has no new screening data to report. Tracking of enforcement actions for monitoring purposes will commence during the fifth permit year, as scheduled.

5.0 INSPECTION AND ENFORCEMENT ACTIONS

Table 2 summarizes the County's enforcement actions to eliminate illicit discharges during the fourth permit year. The number of illegal dumping citations increased 89% from the prior year. The other enforcement actions were issued for the first time last year as a result of the new Storm Water Management Ordinance.

Table 2. Summary of Enforcement Actions

TYPE OF VIOLATION	NUMBER
Discharge of Water from Cleaning Commercial Concrete Truck	1
Discharge of Sewage/Septic Waste	2
Discharge of Rubble, Concrete, or Building Material	3
Illegal Dumping	53
TOTAL	59

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NPDES TRACKING NO. NMR04L003
JULY 1, 2010 – JUNE 30, 2011

CONSTRUCTION SITE STORM WATER RUNOFF
CONTROL (MCM #4)

POST-CONSTRUCTION STORM WATER
MANAGEMENT (MCM #5)



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1.0 INTRODUCTION

Doña Ana County is authorized by the NPDES General Permit for Discharges from Small Municipal Separate Storm Sewer System (MS4) to discharge storm water from its MS4 in the Las Cruces and El Paso Urbanized Areas. The authorization is dependent on the County complying with the conditions of the permit. Part 5.8 of the General Permit for Small MS4s requires the County to submit an annual report to the EPA.

This document reports the County's progress towards meeting the goals of the fourth and fifth Minimum Control Measures (MCM) required by the permit: **Construction Site Storm Water Runoff Control and Post-Construction Storm Water Management in New Development and Redevelopment**. The entire report consists of the following documents placed on compact disks (CDs) for submission to the EPA:

- Report certification
- CD #1 – Compliance Summary
- CD #2 – Public Education and Outreach and Public Involvement/Participation
- CD #3 – Illicit Discharge Detection and Elimination
- CD #4 – Construction Site Storm Water Runoff Control and Post-Construction Storm Water Management in New and Redevelopment
- CD #5 – Pollution Prevention/Good Housekeeping for Municipal Operations
- CD #6 – Appendices

2.0 MS4 INFORMATION

The following information is provided for EPA's tracking purposes.

NPDES Tracking No.:	NMR04L003
MS4 Permittee Name:	Doña Ana County
Address:	845 N. Motel Blvd, Las Cruces, NM 88007
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3.0 ASSESSMENT OF BEST MANAGEMENT PRACTICES

3.1 CONSTRUCTION SITE STORM WATER RUNOFF CONTROL

During the past year, the County's most significant accomplishment in construction site water runoff control was the implementation of a Storm Water Pollution Prevention Plan (SWPPP) review process. The process ensures the County does not issue grading and building permits until the construction site operator has an acceptable SWPPP.

Table 1 summarizes the status of the County's BMPs for construction site storm water runoff control. It is followed by subsections that describe the status of each BMP in greater detail.



Table 1*. Construction Site Storm Water Runoff Control

BMP NO.	BMP DESCRIPTION	RESPONSIBLE DEPARTMENT	MEASURABLE GOALS PERMIT YEAR 4 (2010 - 2011)	PROGRESS ON GOALS PERMIT YEAR 4 (2010 - 2011)	PLANNED ACTIVITIES PERMIT YEAR 5 (2011 - 2012)
4-1	Construction Waste Enforcement under the Solid Waste Ordinance	Comm. Dev.	No further activities; superseded by BMP4-7 after adoption of Storm Water Mgmt Ordinance	Not applicable	No activity scheduled
4-2	Construction Plan Review	Engineering and Comm. Dev.	No further activities; superseded by BMP4-6 after adoption of Storm Water Mgmt Ordinance	Not applicable	No activity scheduled
4-3	Storm Water Management Ordinance	Engineering and Comm. Dev.	Track construction enforcement actions	Completed	Track construction enforcement actions
4-4	SWPPP and BMP Training for Plan Reviewers	Engineering	Train new reviewers and reviewers that missed year 3 training	Completed	Train new reviewers
4-5	Erosion and Sediment Control Training for Inspectors	Engineering and Comm. Dev.	Develop a written SWPPP inspection protocol	Delayed	Develop a written SWPPP inspection protocol and train inspectors with it
4-6	SWPPP Review	Engineering and Comm. Dev.	Require County review and acceptance of SWPPP for regulated sites before issuing County permits	Ahead of schedule: Completed	Require County review and acceptance of SWPPP for regulated sites before issuing County permits
4-7	Construction Site SWPPP Inspections	Engineering and Comm. Dev.	Inspect regulated construction sites within the urbanized areas at least once during construction	On schedule	Inspect regulated construction sites within the urbanized areas at least once during construction
4-8	Construction SWPPP Education	Engineering and Comm. Dev.	Develop hand-out of SWPPP requirements for contractors and developers; track distribution	Delayed	Develop hand-out of SWPPP requirements for contractors and developers; track distribution
4-9	Construction SWPPP Information on Webpage	Public Information	Maintain information on webpage, and track the number of "hits"	Delayed	Maintain information on webpage, and track the number of "hits"

*Table 1 is the same as Table 4 in the Annual Report Compliance Summary.



3.1.1 Construction Waste Enforcement under the Solid Waste Ordinance (BMP4-1)

BMP4-1 used the Solid Waste Ordinance to require controls on construction wastes until the County adopted a Storm Water Management Ordinance (BMP4-3). The new ordinance was adopted by the Board of County Commissioners on April 27, 2010. It requires a Storm Water Pollution Prevention Plan (SWPPP) for construction activities. The SWPPP must contain specific controls for erosion, sediment, and wastes. BMP4-1 is therefore no longer necessary. BMP4-1 is replaced by BMP4-7, which inspects for and enforces the SWPPP requirement.

3.1.2 Construction Plan Review (BMP4-2)

BMP4-2 used reviews of Erosion Control Plans (ECPs), required by the County's existing Erosion Control Regulations, to ensure erosion controls were properly designed until the County adopted a Storm Water Management Ordinance (BMP4-3). The new ordinance was adopted by the Board of County Commissioners on April 27, 2010. It requires a SWPPP for construction activities. BMP4-2 is therefore no longer necessary. BMP4-2 is replaced by BMP4-6, which is a review of SWPPPs for construction activities.

3.1.3 Storm Water Management Ordinance (BMP4-3)

The Board of County Commissioners adopted a Storm Water Management Ordinance on April 27, 2010. Section 9 of the ordinance requires operators of a construction activity to prepare a SWPPP and submit it to the County for review and approval a minimum of 30 days before any land disturbance. The section also requires operators to implement, inspect, and maintain the controls specified in the SWPPP. Sections 10 through 12 of the ordinance authorize the County to issue Administrative, Criminal, and Other Remedies to attain operator compliance with the ordinance.

Since adoption of the Storm Water Management Ordinance, the County has been developing systems and procedures to implement and enforce the new requirements for construction activities. The focus during the fourth permit year was on SWPPP review (BMP4-6) to ensure grading and building permits are not issued until the SWPPP is accepted by the County. Development of an inspection program for SWPPP compliance (BMP4-7) is in progress and is scheduled to be completed in the fifth permit year. Tracking of construction enforcement actions will coincide with implementation of the inspection program.

3.1.4 SWPPP and BMP Training for Plan Reviewers (BMP4-4)

Two people in the Engineering Department reviewed all SWPPPs submitted to the County during the fourth permit year. Both individuals attended 16 hours of training in SWPPP preparation, review, and inspection in June 2010, as discussed in the 2010 Small MS4 Annual Report.



3.1.5 Erosion and Sediment Control Training for Inspectors (BMP4-5)

BMP4-5 in the SWMP has two parts: (1) development of a SWPPP inspection protocol; and (2) training for SWPPP inspectors who use the protocol. Inspectors attended 8 hours of SWPPP inspection training on June 8, 2010, as reported in the 2010 Small MS4 Annual Report. Development of the SWPPP inspection protocol has been delayed until the fifth permit year. The protocol will consist of written procedures and an inspection checklist to ensure consistent inspection of construction sites. It will also contain guidance for enforcement escalation.

3.1.6 SWPPP Review (BMP4-6)

The SWMP scheduled SWPPP review to start in the fifth permit year. Since the Storm Water Management Ordinance was adopted a year early, SWPPP review started ahead of schedule in permit year four. During the year, the County required operators of all construction activities that are one acre and larger (or part of a common plan of development) to submit a SWPPP to the County for review and acceptance before issuing any permits. The SWPPPs are reviewed using a checklist established by the County. A copy of the checklist is in Appendix D.

During permit year four, the County received a total of 91 SWPPPs to review. Of these, 60 required resubmission due to comments made by the County reviewers. A detailed list of the reviewed SWPPPs is in Appendix D. The County will continue to review SWPPPs in permit year five.

3.1.7 Construction Site SWPPP Inspections (BMP4-7)

The SWMP scheduled County inspections of SWPPP implementation at construction sites to start during the fifth permit year. Section 9.F of the Storm Water Management Ordinance requires construction site operators to submit a copy of their signed Notice of Intent (NOI) and EPA's acknowledgement of its receipt at least seven days before starting construction. The County will use the NOIs that it receives to track the number of active construction sites within its urbanized area and schedule inspections. Beginning next year, all construction sites that are one acre and larger and smaller sites that are part of a common plan of development within the urbanized areas of the County will be inspected at least once during construction.

3.1.8 Construction SWPPP Education (BMP4-8)

The goal for permit year four was to develop a hand-out about SWPPP requirements for developers and contractors. This hand-out was delayed. Instead, the County staff has been personally meeting with construction activity operators and responding to their request for assistance with the SWPPP requirements. In permit year five, the County will develop a hand-out of SWPPP requirements and track the distribution.



3.1.9 Construction SWPPP Information on Webpage (BMP4-9)

This BMP consists of posting information about preparing a construction SWPPP on the County's storm water webpage (BMP1-3). It was scheduled to be accomplished last year; however, it has been delayed. The County will prepare and post this information on the webpage by December 31, 2011.

3.2 POST-CONSTRUCTION STORM WATER MANAGEMENT

During the past year, the County's most significant accomplishments in post-construction storm water management were:

- Participation in development of the One Valley, One Vision 2040 Regional Comprehensive Plan, which includes goals and strategies to protect and improve water quality; and
- Sponsorship and participation in "*Green Infrastructure in the Southwest: Challenges and Opportunities*," with the City of Las Cruces

Table 2 summarizes the status of the County's BMPs for post-construction storm water management. It is followed by subsections that describe the status of each BMP in greater detail.



Table 2*. Post-Construction Storm Water Management

BMP NO.	BMP DESCRIPTION	RESPONSIBLE DEPARTMENT	MEASURABLE GOALS PERMIT YEAR 4 (2010 - 2011)	PROGRESS ON GOALS PERMIT YEAR 4 (2010 - 2011)	PLANNED ACTIVITIES PERMIT YEAR 5 (2011 - 2012)
5-1	Vision 2040 Regional Plan	Comm. Dev.	Document activities related to One Valley, One Vision 2040	Completed	Document activities related to One Valley, One Vision 2040
5-2	Evaluation of Existing Ordinances	Comm. Dev. And Engineering	No activity scheduled	Not applicable	Prepare list of ordinance changes for post-construction BMPs
5-3	LID Information on Webpage	Public Information	Maintain information; track number of "hits"	Completed	Maintain information; track number of "hits"
5-4	LID Education	Comm. Dev. and Engineering	GI/LID conference on August 26, 2010	Ahead of Schedule: Completed	No activity scheduled
5-5	Post-Construction BMP Training for Plan Reviewers	Comm. Dev. and Engineering	No activity scheduled	Completed	Train any new reviewers
5-6	Plan Review for Compliance with Development Design Standards	Comm. Dev. and Engineering	Review development plans in urbanized areas to verify they contain post-construction BMPs; track number and type of BMPs	Completed	Review development plans in urbanized areas to verify they contain post-construction BMPs; track number and type of BMPs
5-7	Construction Inspection for Compliance with Development Plans	Comm. Dev. and Engineering	Track number of inspections and enforcement actions within urbanized areas	In progress	Track number of inspections and enforcement actions within urbanized areas
5-8	Maintenance Agreement for Private Drainage Structures	Comm. Dev.	Signed maintenance agreement before approval of final plat for developments with private structures in the urbanized areas	Completed	Signed maintenance agreement before approval of final plat for developments with private structures in the urbanized areas
5-9	LID Principles in Designs for New County Facilities	Engineering	No activity scheduled	Not applicable	Include clause in service contracts that requires AEs to evaluate feasibility of LID features, and maintain list of LID features implemented

*Table 2 is the same as Table 5 in the Annual Report Compliance Summary.



3.2.1 Vision 2040 Regional Plan (BMP5-1)

One Valley, One Vision 2040 is a Regional Comprehensive Plan for Doña Ana County, the City of Las Cruces, and other municipalities in the County. The goal of BMP5-1 is to track the County's involvement in the regional planning process. Through its involvement, the County intends to ensure the plan considers post-construction storm water management for new development and redevelopment.

County Commissioners and staff participated in numerous Steering Committee and Advisory Committee meetings for One Valley, One Vision 2040 during the fourth permit year. Records of these meetings are available at:

www.las-cruces.org/code/vision_2040/Schedule.html

Drafts of the regional plan were presented to the Doña Ana County Planning and Zoning Commission for their review and comment on August 12, 2010, March 20, 2011, and June 23, 2011. The most current draft of One Valley, One Vision 2040 is dated May 26, 2011. The vision statement in the current draft includes: *"As we map out our future, we recognize the value of our mountains, desert environment, rivers, agriculture, and private-property rights and live within the limitations of the unique land and natural resources."*

The regional plan identifies several threats to its vision for the region. Two threats that acknowledge effects on water quality are:

- *"There is potential for damage from flooding in specific parts of the region as a result of the (1) age, condition, design of or development around flood-control infrastructure or (2) disruption of the function of natural or constructed flood-control systems from such factors as illegal dumping, loss of vegetation, or lack of maintenance."*
- *"Built environment includes the threat of encroachment on our historical, cultural, agricultural, and natural resources."*

The regional plan includes goals and strategies for land use, water, environmental resources, and hazards, which have the potential to improve post-construction storm water management. A copy of these goals and strategies are in Appendix E.

Doña Ana County will continue its participation in and work toward adopting One Valley, One Vision 2040 during the next permit year.

3.2.2 Evaluation of Existing Ordinances (BMP5-2)

After the Board of County Commissioners adopts the One Valley, One Vision 2040 Regional Comprehensive Plan, the County will review its planning, zoning, and development ordinances to identify requirements that effect post-construction storm water management. The County will then evaluate and recommend changes to protect water quality and improve post-construction storm water management in line with the goals and strategies of the regional plan.



The SWMP schedules BMP5-2 to start during the fifth permit year; however, the One Valley, One Vision 2040 Regional Comprehensive Plan may not be adopted before the end of the fifth permit year. Proposed SWMP changes in the Compliance Summary section of the annual report include moving the start of BMP5-2 to the first full permit year after adoption of the regional plan.

3.2.3 LID Information on Webpage (BMP5-3)

The County posted a link to EPA's LID webpage ahead of schedule in the third permit year. The County maintained this link during the past year. The LID information received a total of 53 visits during the fourth permit year. The County will continue to track visits to the LID information for the remainder of the permit term.

3.2.4 LID Education (BMP5-4)

The SWMP scheduled a LID workshop for permit year five. The County moved the workshop forward in the schedule when the City of Las Cruces asked the County to participate in a regional Green Infrastructure Conference. "*Green Infrastructure in the Southwest: Challenges and Opportunities*" was held on August 26, 2010. The County participated in the GI Conference Organizing Committee and was a Gold Level (\$1,000) sponsor for the conference. Selected pages from the GI Conference Summary Report are in Appendix E.

Several members of the County Engineering Department attended the workshop. Robert Armijo, PE, County Engineer, was also a member of the panel for conference session 4A. The session was a 90 minute, moderated discussion of GI/LID implementation issues with local governments.

3.2.5 Post-Construction BMP Training for Plan Reviewers (BMP5-5)

BMP5-5 was completed as scheduled during the third permit year. More information is in the 2010 Small MS4 Annual Report. No activity was scheduled for BMP5-5 in the fourth permit year. Next year the County will train any new plan reviewers and will take advantage of opportunities, as they become available, to provide additional post-construction BMP training for all of its plan reviewers.

3.2.6 Plan Review for Compliance with Development Design Standards (BMP5-6)

The purpose of this BMP is to ensure that post-construction storm water management controls are included in plans for development and redevelopment. Design of the post-construction storm water management controls are governed by the requirements in applicable Doña Ana County Ordinances and Standards, which are typically the Land Use and Zoning Regulations and the Development Design Standards.

During the fourth permit year, the County reviewed five sets of plans within the urbanized areas for conformance with post-construction storm water management requirements. Three of the plans were for subdivisions, and two were for commercial buildings. The plans included designs for five different types of post-construction storm water management controls, and some plans contained multiple controls. Table 3 describes the controls included in the plans.



Table 3. Post-Construction Storm Water Management Controls Reviewed

TYPE OF CONTROL	NUMBER
100-yr Storm Event Retention Basins	7
2-yr Storm Event Retention Basin with Detention for Larger Storm Events	1
10-yr Storm Event Retention Basin with Detention for Larger Storm Events	1
Soil Cement Side Slope Stabilization of an Arroyo	1
Rip-Rap Check Dams	1
Desilting Basin	1
TOTAL	12

The County will continue to review plans and track the number and types of post-construction storm water management controls during the next permit year.

3.2.7 Construction Inspection for Compliance with Development Plans (BMP5-7)

The purpose of BMP5-7 is to ensure development in the urbanized areas is constructed according to the plans reviewed and approved in BMP5-6. During the fourth permit year, the goal of BMP5-7 was to track the number of inspections and enforcement actions that resulted when construction was not according to plans.

The County’s Engineering Department inspected construction of two subdivisions within the urbanized areas during permit year four. The County’s Building Services Department inspected construction of two commercial buildings during the same period. The exact number of inspections was not tracked. No enforcement actions were issued. The County will continue the inspection program during the next permit year and will implement a tracking process for each inspection.

3.2.8 Maintenance Agreement for Private Drainage Structures (BMP5-8)

The County requires maintenance agreements before approving the final plat for developments with private ponds and other private drainage structures. In permit year four, seven new private ponds were designed, and five of those were constructed within urbanized areas of Doña Ana County. Table 4 summarizes the ponds. All the ponds are covered by maintenance agreements, copies of which are in Appendix E.

Table 4. New Private Ponds with Maintenance Agreements

SUBDIVISION NAME	URBANIZED AREA	NUMBER OF PONDS
Picacho Mountain Phase 3A	Las Cruces	4
Inspiration Heights Phases 3 and 5	Las Cruces	2
Parque Homes	El Paso	1
TOTAL		7



3.2.9 LID Principles in Designs for New County Facilities (BMP5-9)

No activity was scheduled for BMP5-9 during permit year four. In permit year five, the County will include a clause in professional services contracts that requires architects and engineers to evaluate the feasibility of LID features when designing County facilities. The County will also maintain a list of LID features as they are implemented in designs for new County facilities.

4.0 ANALYSIS OF MONITORING DATA

4.1 CONSTRUCTION SITE STORM WATER RUNOFF CONTROL

The Monitoring/Assessment Plan for construction site storm water runoff control is to:

- Track the number of County inspections for SWPPP compliance; and
- Track the percentage of the inspections that result in an enforcement action.

Tracking the above items will enable the County to monitor the effectiveness of its program to control pollutant discharges from construction sites. Inspections that result in no enforcement action would mean a SWPPP was prepared and implemented correctly, and it should therefore be effective in controlling pollutants. Initially, the percentage of inspections that result in enforcement may be high; however, the percentage would be expected to drop as pollution prevention becomes a routine part of construction in the County's urbanized areas. The Monitoring/Assessment Plan scheduled this activity to start next permit year.

4.2 POST-CONSTRUCTION STORM WATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

The Monitoring/Assessment Plan for post construction storm water management is to:

- Track the number of development plans reviewed;
- Track the percentage of the reviewed plans that include a post-construction storm water management control to mitigate the development's effect on storm water quality; and
- Maintain an inventory of the location and types of post-construction controls constructed.

During the fourth permit year, the County reviewed BMP5-6 a total of five development plans within the urbanized areas, of which 100% included a control for post-construction storm water management. The inventory of post-construction controls constructed during the past year is in Table 5 (next page).



Table 5. Inventory of Post-Construction Storm Water Management Controls

TYPE OF CONTROL	URBANIZED AREA	SUBDIVISION NAME	OWNERSHIP	NUMBER
Detention Pond	Las Cruces	Picacho Mountain Phase 3A	Developer/ HOA	4
Arroyo Side Slope Protection	Las Cruces	Picacho Mountain Phase 3A	Developer/ HOA	1
Rip-Rap Check Dams	Las Cruces	Picacho Mountain Phase 3A	Developer/ HOA	1
Desilting Basin	Las Cruces	Picacho Mountain Phase 3A	Developer/ HOA	1
Detention Pond	Las Cruces	Santa Rosa de Lima Church	Property Owner	1
Detention Pond	Las Cruces	Valley Cold Storage	Property Owner	1
Detention Pond (with outlet structure)	Las Cruces	Denco, Inc.	Property Owner	1
Detention Pond (with controlled outlet)	El Paso	Parque Homes	Developer	1
Detention Pond (rock side slopes)	El Paso	Dollar General	Property Owner	1
TOTAL				12

The County will add new controls to the inventory as they are reviewed (BMP5-6) and inspected (BMP5-7) each permit year.

5.0 INSPECTION AND ENFORCEMENT ACTIONS

5.1 CONSTRUCTION SITE STORM WATER RUNOFF CONTROL

The SWMP scheduled construction site inspections (BMP4-7), and thus enforcement, to be implemented next permit year. Therefore, the County has no inspection and enforcement data to report for the fourth permit year.

5.2 POST-CONSTRUCTION STORM WATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

Inspections for compliance with development plans that include post-construction storm water management controls (BMP5-7) started during the fourth permit year. Two subdivisions and two commercial buildings were inspected within the urbanized areas; however, the County did not track the total number of inspections. No enforcement actions were issued.

DOÑA ANA COUNTY
NPDES SMALL MS4 ANNUAL REPORT
SEPTEMBER 2011



NPDES TRACKING NO. NMR04L003
JULY 1, 2010 – JUNE 30, 2011

POLLUTION PREVENTION/GOOD HOUSEKEEPING
FOR MUNICIPAL OPERATIONS (MCM #6)



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1.0 INTRODUCTION

Doña Ana County is authorized by the NPDES General Permit for Discharges from Small Municipal Separate Storm Sewer System (MS4) to discharge storm water from its MS4 in the Las Cruces and El Paso Urbanized Areas. The authorization is dependent on the County complying with the conditions of the permit. Part 5.8 of the General Permit for Small MS4s requires the County to submit an annual report to the EPA.

This document reports the County's progress towards meeting the goals of the last Minimum Control Measure (MCM) required by the permit: **Pollution Prevention/Good Housekeeping for Municipal Operations**. The entire report consists of the following documents placed on compact disks (CDs) for submission to the EPA:

- Report certification
- CD #1 – Compliance Summary
- CD #2 – Public Education and Outreach and Public Involvement/Participation
- CD #3 – Illicit Discharge Detection and Elimination
- CD #4 – Construction Site Storm Water Runoff Control and Post-Construction Storm Water Management in New and Redevelopment
- CD #5 – Pollution Prevention/Good Housekeeping for Municipal Operations
- CD #6 – Appendices

2.0 MS4 INFORMATION

The following information is provided for EPA's tracking purposes.

NPDES Tracking No.:	NMR04L003
MS4 Permittee Name:	Doña Ana County
Address:	845 N. Motel Blvd, Las Cruces, NM 88007
Point of Contact:	Henry K. Corneles, PE, Engineer Supervisor
Phone Number:	575-525-6162
Fax Number:	575-525-6179
E-mail:	henryco@donaanacounty.org

3.0 ASSESSMENT OF BEST MANAGEMENT PRACTICES

During the past year, the County's most significant accomplishments in pollution prevention and good housekeeping for municipal operations were:

- Limiting pesticide and herbicide applications to licensed applicators;
- Using native and adapted plants for landscaping at the De La O Center;
- Revising Fleet Department's Pollution Prevention Plan and establishing a quarterly self-inspection program; and
- Developing Pollution Prevention Plans for Roads and Facilities & Parks Departments.

Table 1 summarizes the status of the County's BMPs for pollution prevention/good housekeeping for municipal operations. It is followed by subsections that describe the status of each BMP in greater detail.



Table 1*. Pollution Prevention/Good Housekeeping for Municipal Operations

BMP NO.	BMP DESCRIPTION	RESPONSIBLE DEPARTMENT	MEASURABLE GOALS PERMIT YEAR 4 (2010 - 2011)	PROGRESS ON GOALS PERMIT YEAR 4 (2010 - 2011)	PLANNED ACTIVITIES PERMIT YEAR 5 (2011 - 2012)
6-1	Roadway Cleaning	Roads	Track lane miles swept within urbanized areas and amount of debris collected	Delayed	Track lane miles swept within urbanized areas and amount of debris collected
6-2	Road Culvert Maintenance	Roads	Track number of culverts inspected in urbanized areas and amount of debris collected	Delayed	Track number of culverts inspected in urbanized areas and amount of debris collected
6-3	Storm Inlet/Outlet Maintenance	Roads	Track number of inlet/outlet structures inspected within the urbanized areas and amount of debris removed	Delayed	Track number of inlet/outlet structures inspected within the urbanized areas and amount of debris removed
6-4	Storm Drain Pipe Maintenance	Roads	Track linear feet of pipes inspected and cleaned within the urbanized areas and amount of debris removed	Delayed	Track linear feet of pipes inspected and cleaned within the urbanized areas and amount of debris removed
6-5	Waste Management	Roads	No activity scheduled for year 4	Not applicable	Develop written Standard Operating Procedures for storage, hauling and disposal of sediment/debris removed from streets/drainage system
6-6	Licensing of County Applicators	Facilities & Parks	License/certify all County applicators	Completed	Limit pesticide/herbicide use to licensed applicators
6-7	Xeriscaping	Facilities & Parks	Where appropriate, new or replacement landscaping at County facilities is native and adapted plants	Completed	Where appropriate, new or replacement landscaping at County facilities is native and adapted plants
6-8	Trash Pick-up at Park Facilities	Facilities & Parks	Maintain regular trash collection, and track the volume collected	Completed	Maintain regular trash collection, and track the volume collected
6-9	Spill Cleanup Kits	Fleet & Sheriff's Office	Maintain spill cleanup kit in each County maintenance facility	Completed	Maintain spill cleanup kit in each County maintenance facility
6-10	Drip Pan Usage	Fleet & Sheriff's Office	Daily inspection and use of drip pans under vehicles awaiting repair at maintenance facilities	In progress	Daily inspection and use of drip pans under vehicles awaiting repair at maintenance facilities



BMP NO.	BMP DESCRIPTION	RESPONSIBLE DEPARTMENT	MEASURABLE GOALS PERMIT YEAR 4 (2010 - 2011)	PROGRESS ON GOALS PERMIT YEAR 4 (2010 - 2011)	PLANNED ACTIVITIES PERMIT YEAR 5 (2011 - 2012)
6-11	Good Housekeeping for Vehicle Maint. Facilities	Fleet & Sheriff's Office	Revise plan as needed based on results of BMP6-12	In progress	Complete plan for Sherriff's facility; revise plan as needed based on results of BMP6-12
6-12	Inspection of Vehicle Maint. Facilities	Fleet & Sheriff's Office	Develop an inspection form, and perform quarterly inspections of the vehicle maintenance facilities	On Schedule: Fleet completed and Sheriff's pending	Complete inspection form for Sherriff's facility; perform quarterly inspections
6-13	Minimization of Material Exposure	Roads & Facilities & Parks	Develop and maintain an inventory of materials stored outside	Completed	Update inventory of materials stored outside
6-14	Good Housekeeping for County Operations	Roads & Facilities & Parks	Prepare and implement written good housekeeping procedures for materials stored outside	Completed	Revise procedures as needed based on results of BMP6-13
6-15	Storm Water Pollution Prevention Training	Roads, Fac. & Parks, Utilities, Comm. Dev., and Sheriff's Office	Train all employees who work outside	In progress	Train all employees who work outside
6-16	Facility BMP Training	Fleet, Roads, Facilities & Parks, and Sheriff's Office	Maintain a training log-in sheet showing that employees who are responsible for implementing BMPs are trained annually	In progress	Maintain a training log-in sheet showing that employees who are responsible for implementing BMPs are trained annually
6-17	SWPPPs for County Projects	Engineering, Flood Commission and Utilities	Develop, implement, and inspect SWPPPs for County projects covered by the CGP	Completed	Develop, implement, and inspect SWPPPs for County projects covered by the CGP
6-18	Water Quality Criteria for County Flood Control and Drainage Projects	Engineering and Flood Commission	Include requirement in engineering services contracts to do a downstream assessment for erosion potential and evaluate water quality improvements before design reaches 50%	In progress	Include requirement in engineering services contracts to do a downstream assessment for erosion potential and evaluate water quality improvements before design reaches 50%

*Table 1 is the same as Table 6 in the Annual Report Compliance Summary.



3.1 Roadway Cleaning (BMP6-1)

BMP6-1 consists of regularly sweeping County roads to minimize the amount of trash and loose debris that could be transported by storm water. The County implemented sweeping during the third permit year, as scheduled in the SWMP. However, the sweeper was out of service during the fourth permit year. Repairs are in progress, and roadway cleaning will resume in permit year five.

3.2 Road Culvert Maintenance (BMP6-2)

Keeping road culverts clear of trash and debris reduces the amount of material that is washed into receiving water with storm water discharges. The County initiated BMP6-2 during the third permit year; however, the maintenance activity was suspended last year. In permit year five, the County will resume maintenance of road culverts within the urbanized areas and will track the amount of material that is removed.

3.3 Storm Inlet/Outlet Maintenance (BMP6-3)

Routine inspection and maintenance of storm inlets and outlets provides an opportunity to remove pollutants from the MS4. The County initiated BMP6-3 during the third permit year; however, the maintenance activity was suspended last year. In permit year five, the County will resume maintenance of storm inlets and outlets and will track the amount of material that is removed.

3.4 Storm Drain Pipe Maintenance (BMP6-4)

Using a vacuum truck, the County cleans and removes pollutants from storm drain pipes within the urbanized areas. The County implemented pipe maintenance during the third permit year. However, the vacuum truck was out of service during the fourth permit year. The County will resume maintenance of storm drain pipes in permit year five.

3.5 Waste Management (BMP6-5)

The goal of BMP6-5 is to ensure that the material removed from the MS4 by BMPs 6-1 through 6-4 is managed and disposed of in a manner that minimizes the potential for it to discharge pollutants back into the MS4. No activities were scheduled for BMP6-5 in permit year four. In the fifth permit year, the County is scheduled to develop written Standard Operating Procedures for storage, hauling, and disposal of sediment and debris removed from the MS4.

3.6 Licensing of County Applicators (BMP6-6)

In the fourth permit year, the County identified the pesticides and herbicides that it applies to County property and reviewed the licensing requirements for the substances. The County routinely applies the following "General Use" pesticides/herbicides: Honcho Plus; Agnique-MMF; AltoSid; and Demand CS.

In the State of New Mexico, government employees are allowed to apply "General Use" substances without an applicator's license; however, a commercial applicator is required to be licensed to apply the same substances. With BMP6-6, the County voluntarily adopted licensing for its employees. Obtaining an applicator's license requires employees to demonstrate by



testing that they are properly trained to protect themselves, the public, and the environment when storing, handling, applying, and disposing of pesticides and herbicides. In the past, all of the “General Use” substances, except for Honcho Plus, were applied by the County’s five Vector Control employees. These employees hold Public Applicator’s Licenses. Honcho Plus has historically been applied by unlicensed Parks employees. Last year, the County changed its procedures so that the licensed applicators applied all of the substances, including Honcho Plus. During the next permit year, the County will support and schedule selected Parks employees to train and test for the Public Applicator’s License. The licensing guidelines are in Appendix F.

The County also applies Aqualuer 20-20, which is a “Government Use” pesticide. It can only be purchased and applied by government employees with a Public Applicator’s License. Application of this pesticide is limited to the five vector control employees who are licensed.

3.7 Xeriscaping (BMP6-7)

The De La O Center in the community of Doña Ana was restored during the last permit year. Landscaping for the restoration consisted of the native and adapted plants listed in Table 2. These plants require less water, pesticides, and fertilizers, which reduces the amount of pollutants that could potentially enter storm water runoff from the landscaping. The County will continue to use native and adapted plants for landscaping in future permit years.

Table 2. Landscaping for De La O Center

COMMON NAME	SCIENTIFIC NAME	QUANTITY	REMARKS
Catalpa	<i>Bignoniaceae</i>	5	Tree
Purple Rose Locust	<i>Robina pseudoacaca</i>	1	Tree
Mesquite Tree	<i>Fabaceae (leguminosae)</i>	5	Tree
Lavender Cotton	<i>Santolina chamaecyparissuis</i>	2	Shrub
Mexican Hat	<i>Ratibida columnifera</i>	13	Flower
Yucca	<i>Agauaceae</i>	4	Flower
Ornamental Grass	<i>Helictotrichan sempervirens</i>	6	Blue Avena Grass
Ocotillo	<i>Fouquieria splendens</i>	3	Shrub (one of which is a relocated)
Moonshine Yarrow	<i>Achillea tomentosa</i>	4	Flower

3.8 Trash Pick-up at Park Facilities (BMP6-8)

Keeping the County’s parks free of litter and debris reduces the amount of floatables that could enter storm water. During the fourth permit year, trash was collected from the County’s parks twice a week. Weight tickets for each load are maintained at the Parks Department office. Regular trash collection will continue at the County’s parks during permit year five.

3.9 Spill Cleanup Kits (BMP6-9)

Availability and proper use of spill cleanup kits reduces the amount of pollutants that could enter storm water runoff at County vehicle maintenance facilities. The Fleet Department purchased spill kits on July 21, 2010, to add to the one kit it already had, as was reported in the 2010 Small



MS4 Annual Report. The County also purchased an oil vacuum during permit year four. A copy of the receipt for this purchase is in Appendix F.

The Sheriff's Office operates a separate maintenance facility for the Sheriff's vehicles. The facility maintains a supply of dry absorbent and absorbent pads to use for spill cleanup. The pads are used routinely for drips, leaks, and small spills. The dry absorbent is placed on larger spills.

3.10 Drip Pan Usage (BMP6-10)

Leaking vehicles awaiting repair at the County's vehicle maintenance facilities are a potential source of storm water pollutants. Both the Fleet's and the Sheriff's vehicle maintenance facilities have drip pans. As part of its good housekeeping procedures (BMP6-11), Fleet Department implemented daily inspections of vehicles awaiting repairs. If any are leaking, Fleet Department places a drip pan under the vehicle until it is moved into the maintenance shop. The Sheriff's vehicle maintenance facility is in the process of implementing a similar procedure.

3.11 Good Housekeeping for Vehicle Maintenance Facilities (BMP6-11)

During the third permit year, Fleet Department developed a Pollution Prevention Plan that included good housekeeping procedures. During the fourth permit year, it was determined the plan needed revising. The new Fleet Department Pollution Prevention Plan is in Appendix F.

The Sheriff's vehicle maintenance facility has standard good housekeeping and pollution prevention procedures but nothing is written. During the fifth permit year, they will develop a formal Pollution Prevention Plan with good housekeeping procedures for their facility.

3.12 Inspection of Vehicle Maintenance Facilities (BMP6-12)

No activity was scheduled for BMP6-12 in permit year four; however, Fleet Department completed this BMP ahead of schedule. They developed a Quarterly Inspection Form to check for potential storm water pollutants and to verify their Pollution Prevention Plan is properly implemented. A copy of the form is in Appendix F. Inspections will start in the first quarter of the fifth permit year.

After formalizing their Pollution Prevention Plan (BMP6-11) next year, the Sheriff's maintenance facility will develop a similar self-inspection form, as scheduled in the SWMP.

3.13 Minimization of Material Exposure (BMP6-13)

During the fourth permit year, the County inventoried materials and wastes exposed to storm water at the Roads Department and the Facilities & Parks Department. Copies of the inventories are in Appendix F. The Facilities & Parks Department's inventory consists of areas for Vector Control and Facilities Maintenance. The Parks' area was lost to a fire last year before the inventory was conducted. Parks' operations will be inventoried next year after their new facility is constructed.

Materials and waste stored outside can contribute pollutants to storm water runoff. The inventories were used to develop good housekeeping procedures to minimize the discharge of



pollutants (BMP6-14). The inventory will be repeated each permit year to monitor the program's effectiveness in reducing potential pollutants at the County's facilities.

3.14 Good Housekeeping for County Operations (BMP6-14)

During the fourth permit year, the County developed Pollution Prevention Plans for Roads and Facilities & Parks Departments. The plans include good housekeeping procedures for the materials and wastes exposed to storm water at facilities operated by these departments. In addition, the plans contain BMPs for County operations that potentially generate storm water pollutants. Copies of the plans are in Appendix F.

3.15 Storm Water Pollution Prevention Training (BMP6-15)

Employees who work outside have the potential to generate storm water pollution as they perform daily tasks. These employees can also be the County's "eyes and ears" in the field to detect potential illicit discharges. General training in storm water pollution awareness and prevention can assist the County in achieving the goals of its SWMP. Personnel in the Roads and Facilities & Parks Departments received this training as part of their Facility BMP Training (BMP6-16) during the fourth permit year. Other County departments with employees who work outside or regularly travel through the urbanized areas are Utilities, Community Development, and the Sheriff's Office. The County is in the process of developing training for these departments. The training will be implemented during the fifth permit year.

3.16 Facility BMP Training (BMP6-16)

The goal of BMP6-16 is to annually train the employees who have responsibilities to implement the good housekeeping procedures developed in BMP6-11 and BMP6-14. Last year annual training started for employees of Roads and Facilities & Parks Departments. Training outlines and sign-in sheets are in Appendix F.

The SWMP scheduled BMP6-16 to be implemented during the fourth permit year. Fleet Department did not meet this schedule, but their employees were trained before submission of the annual report. A copy of the Fleet Department training sign-in sheet is in Appendix F. Employees in the Sheriff's Office vehicle maintenance facility will start their annual training next year.

3.17 SWPPP for County Projects (BMP6-17)

Implementing a SWPPP on County construction projects minimizes pollutant discharges from the construction activities and maintains the County's compliance with the NPDES General Permit for Storm Water Discharges from Construction Activities. Table 3 shows the County's construction projects during the fourth permit year. The County implemented a SWPPP on all projects required to have a SWPPP under the NPDES Construction General Permit.



Table 3. County Construction Projects

PROJECT NAME	RESPONSIBLE DEPARTMENT	SWPPP STATUS	COUNTY NPDES TRACKING NUMBER
Berino Pond	Flood Commission	Implemented	NMR10H976
Brown Farm Pond	Flood Commission	Not Needed (Maintenance)	N/A
Airport Hangar	Engineering	Implemented	NMHR10H347
Shrode Road	Engineering	Implemented	NMHR10H231
Berino Road	Engineering	Implemented	NMHR10GY76
Thorpe	Engineering	Not Needed (Maintenance)	N/A
Abeyta Road	Engineering	Not Needed (<1 ac)	N/A
Desert Park	Engineering	Not Needed (Maintenance)	N/A
Missile Lane	Engineering	Not Needed (<1 ac)	N/A
Paetz Lane	Engineering	Not Needed (<1 ac)	N/A
Picacho Hills	Engineering	Not Needed (Maintenance)	N/A
Tepache Road	Engineering	Not Needed (<1 ac)	N/A
Organ Roads	Engineering	Not Needed (Maintenance)	N/A

3.18 Water Quality Criteria for County Flood Control and Drainage Projects (BMP6-18)

The purpose of BMP6-18 is to consider water quality impacts when the County designs new flood control and drainage projects. The County is in the process of drafting a water quality clause for its design contracts. The clause will require the designer of record to:

- Evaluate downstream flow conditions to ensure the project does not increase downstream erosion; and
- Evaluate the feasibility of incorporating design features to improve water quality.

The above evaluation will be required before the project design is 50% completed. The clause will be in all professional services contracts for the design of flood control and drainage projects starting in the fifth permit year.



4.0 ANALYSIS OF MONITORING DATA

The Monitoring/Assessment Plan for municipal operations is to:

- Track the amount of material removed from the MS4 in the urbanized areas;
- Track the percentage of County employees applying a pesticide or herbicide who are licensed applicators;
- Track results of quarterly self-inspections at the County's vehicle maintenance facilities and the percentage of problems that are corrected within three working days;
- Track the percentage of material exposed to storm water that is removed, covered, or provided with a BMP to reduce the pollution potential; and
- Track the percentage of County flood control and drainage projects that incorporate a design feature to improve water quality.

The Monitoring/Assessment Plan scheduled all of the above to be implemented during the fourth permit year, except for the vehicle maintenance facility inspections. The inspections are scheduled to start next year.

4.1 MS4 Cleaning

MS4 cleaning activities were delayed in permit year four due to equipment being out of service. MS4 cleaning will resume next year. The County will start monitoring the amount of sediment, waste, and debris removed from the MS4 during the fifth permit year.

4.2 Pesticides and Herbicides

Last year the County assessed the pesticides and herbicides applied by County personnel and the applicators licenses held by the personnel. A summary of the assessment is the last item in Appendix F. The County determined that 45% of employees who applied a pesticide or herbicide held an NMDA Public Applicator's License. Since the assessment, the County has changed procedures and now only allows the licensed employees to apply pesticides and herbicides. The County also started the process to obtain licenses for more employees. Next year's assessment should show an increase in the percentage of employees applying pesticides or herbicides who are licensed.

4.3 Outdoor Material Storage

During permit year four, the County performed its base line inventory of material stored outside and exposed to storm water at facilities operated by the Roads and Facilities & Parks Departments (BMP6-13). In future years, the results of last year's inventory will be the baseline for assessing the County's progress in minimizing the amount of material exposed to storm water.

4.4 Capital Improvement Projects

Monitoring projects for the inclusion of design features to improve water quality is dependent on implementation of BMP6-18, which was in progress at the end of the fourth permit year. The County will start monitoring its projects next year.