Stormwater Management Program

Phase II (Small) Municipal Separate Storm Sewer System (MS4)

General Permit TXR040000 Level 2 Operator

For

Fort Bliss, Texas

U.S. Army Installation Management Command

Garrison Command Fort Bliss, Texas

January 2025

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STORMWATER MANAGEMENT PROGRAM
FORT BLISS, TEXAS

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LIST OF ACRONYMS AND ABBREVIATIONS

BBC	Balfour Beatty Communities
BAAF	Biggs Army Airfield
BOID	Business Operations and Integration Division
BMP	Best Management Practice
CGP	Construction General Permit
DPW	Directorate Of Public Works
ED	Environmental Division
EISA	Energy Infrastructure Security Act
EPAS	Environmental Performance Assessment System
ESD	Engineering Division
HD	Housing Division
IDDE	Illicit Discharge Detection and Elimination
LID	Low Impact Development
MCM	Minimum Control Measure
MEP	Maximum Extent Practicable
MPD	Master Planning Division
MSGP	Multi Sector General Permit
MS4	Municipal Separate Storm Sewer System
NEPA	National Environmental Policy Act
NOAA	National Oceanic and Atmospheric Administration
NPDES	National Pollutant Discharge Elimination System
RCI	Residential Community Initiative
SED	Sustainability and Energy Division,
SWPPP	Stormwater Pollution Prevention Plan
TCEQ	Texas Commission on Environmental Quality
USEPA	U.S. Environmental Protection Agency
UTEP	University of Texas at El Paso

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STORMWATER MANAGEMENT PROGRAM
FORT BLISS, TEXAS

1.0 Introduction

This Stormwater Management Program (SWMP) Document was developed by Fort Bliss to describe the activities, and control measures the installation conducts to meet the terms and conditions in accordance with the Texas Small Municipal Separate Storm Sewer (MS4) General Permit TXR040000. This regulatory document is to be implemented and enforced by Fort Bliss Military Installation to reduce the discharge of pollutants to urban stormwater to the Maximum Extent Practicable (MEP). This program is required for compliance operation of the Fort Bliss MS4.

1.1 Regulatory Information

The U.S. Environmental Protection Agency's (USEPA) Phase I Stormwater Program was promulgated in 1990 under the Clean Water Act. Phase I relies on National Pollutant Discharge Elimination System (NPDES) permit coverage to address stormwater runoff from: (1) "medium" and "large" MS4s generally serving populations of 100,000 or greater; (2) construction activity disturbing 5 acres of land or greater; and (3) 10 categories of industrial activity.

The Stormwater Phase II final rule requires NPDES permit coverage for all "small" MS4s, serving less than 100,000 people and located within a Bureau of Census-delineated urbanized area. An urbanized area is a central place-(s) and the adjacent densely settled surrounding territory, that together have a minimum residential population of 50,000 people and a minimum average density of 1,000 persons per square mile. The purpose of the Phase II regulation is to provide a flexible approach for reducing environmental harm caused by stormwater discharges from point sources that were not regulated under Phase I. Military installations that have separate storm sewer systems within an urbanized area are considered to be small MS4s and must meet the requirements of this rule. Small MS4s must develop a SWMP, according to the provisions of the general permit, to the extent allowable under state and local law, to address the portions of the small MS4 that are either located within the urban area or that are designated by the TCEQ, with discharges that reach Waters of the U.S. as defined in 40 CFR §122.2.

MS4 requirements include developing and implementing a SWMP that includes an array of best management practices (BMPs) that reduce pollutants to the MEP to protect water quality and satisfy USEPA water quality standards. As a military installation, Fort Bliss is categorized as a non-traditional Level 2 small MS4 through a General Permit known as theTXR040000. The permit requires the program and its BMPs to be organized into six minimum control measures (MCMs):

- MCM 1: Public Education and Outreach

- MCM 2: Public Involvement/Participation
- MCM 3: Illicit Discharge Detection and Elimination (IDDE)
- MCM 4: Construction Site Stormwater Runoff Control
- MCM 5: Post-construction Stormwater Management in New Development and Redevelopment
- MCM 6: Pollution Prevention and Good Housekeeping for Municipal Operations

The SWMP must provide measurable goals (quantitative or qualitative) for each BMP, estimated dates of implementation, and the identified person(s), departments, divisions, or units responsible for implementing the BMPs. This document, which is subject to review and approval by the Texas Commission on Environmental Quality (TCEQ), describes the Fort Bliss SWMP.

1.2 Site Information

The U.S. Army Garrison Fort Bliss is a major Department of Defense (DoD) installation comprised of state-of-the-art training areas, ranges and facilities, led by adaptive, innovative and warrior-focused professionals, concentrated on individual and unit readiness, leader development, deployment, security and the well-being of Fort Bliss. The installation consists of approximately 1.1 million acres located in western Texas and southern New Mexico (Figure 1.1).

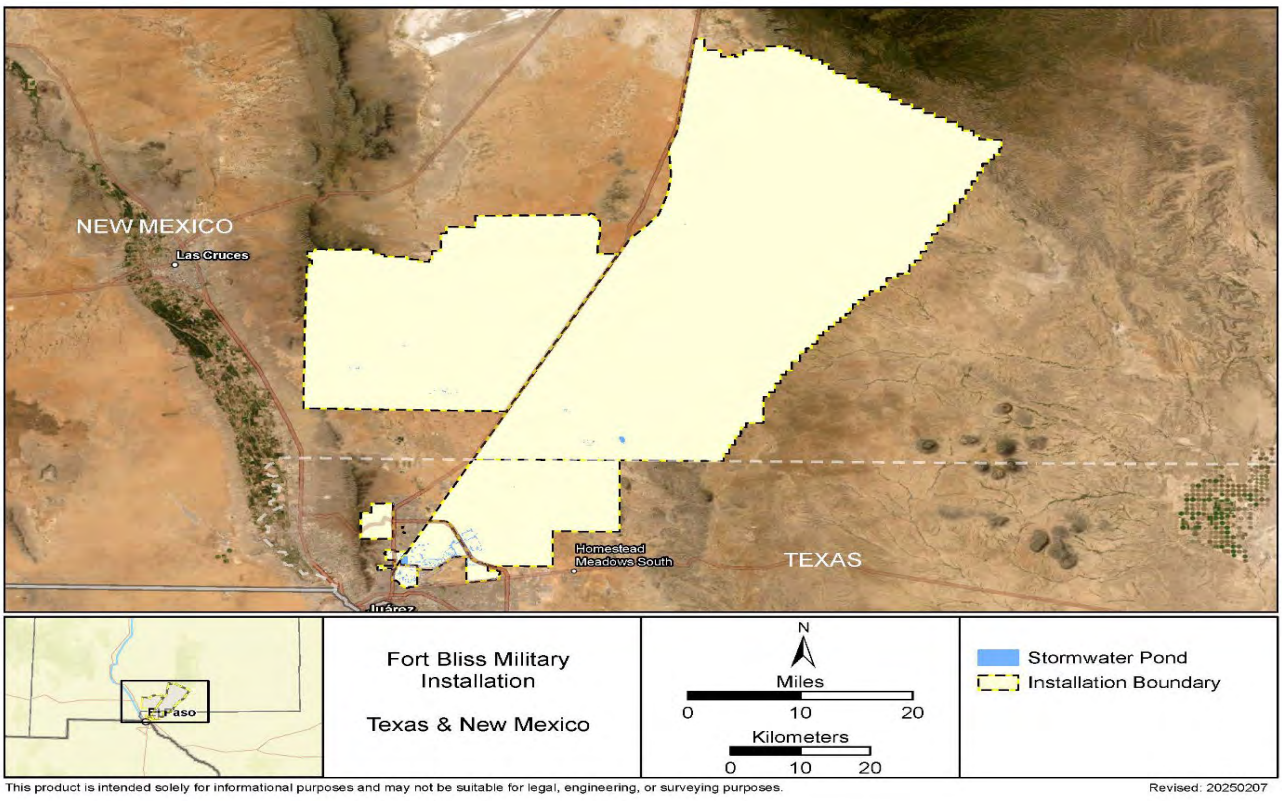

Figure 1.1 – Fort Bliss Army Installation, Texas & New Mexico

The main mission Fort Bliss is a Strategic Deployment Platform that executes deployment operations enabling rapid and efficient unit deployment and re-deployment. Simultaneously, Fort Bliss Garrison provides facilities and services through a professional workforce that assists units in sustaining their readiness and promotes a safe and secure installation, empowering Soldiers, Families, and Civilians to thrive. To accomplish this mission, Fort Bliss provides facilities ranging from troop training support facilities to residences, schools, a post office, medical facilities, fitness centers, grocery stores, automobile service stations and other commercial facilities. Much of the installation is comprised of training land and range camps in Otero and Doña Ana counties in New Mexico State, which include McGregor Range Camp, Doña Ana Range Camp, Oro Grande Range Camp, and Meyer Target Range Camp. These camps are used for air defense training and troop deployment exercises. However, most of the land is vacant and used only for short periods of time each year for range training. Fort Bliss population and buildings are concentrated within areas located in El Paso County, Texas. Unless otherwise stated within this document, the term “public” represents soldiers, military and civilian workers, residents and visitors within the boundaries of Fort Bliss.

1.2.1 Infrastructure and Environment

The Directorate of Public Works is the installation's primary organization responsible for maintenance of the installation infrastructure and environment. The DPW consists of seven divisions the Engineering Division (ESD), Sustainability and Energy Division (SED), the Operations & Maintenance Division (OMD), the Environmental Division (ED), the Housing Division (HD), the Master Planning Division (MPD), and the Business Operations and Integration Division (BOID).

1.2.1.1 DPW Responsibilities

The ESD is responsible for the design and construction of all infrastructure projects. The OMD is responsible for the actual maintenance and improvement of the installation property, buildings and facilities. The ED is responsible for the oversight of the installation's natural and cultural resources ensuring compliance with environmental policy, programs and legislation, managing the Region Environmental Program in support of the Army's environmental strategy for pollution prevention, compliance, restoration and conservation (including the Qualified Recycling Program). The Housing Division manages all garrison housing programs and facilities to include oversight of the Residential Community Initiative (RCI) partnership. The MPD plans all new construction and improvement to installation facilities, grounds and is responsible for Master Planning, Real Estate and all real property records. BOID provides resource management, annual work plan and prioritization, and human resource management.

1.3 Location

The Texas portion of Fort Bliss is geographically located within El Paso County, between the Franklin Mountains located to the west and the Hueco Mountains located to the east (Figure 1.2). Most of the urbanized portion of Fort Bliss, including Biggs Army Airfield (BAAF), is adjacent and contiguous with the City of El Paso.

The Fort Bliss urbanized area includes Main Cantonment, BAAF, East Bliss, William Beaumont Army Medical Center, Logan Heights, and the Castner Range National Monument. (Figures 1.3a-f).

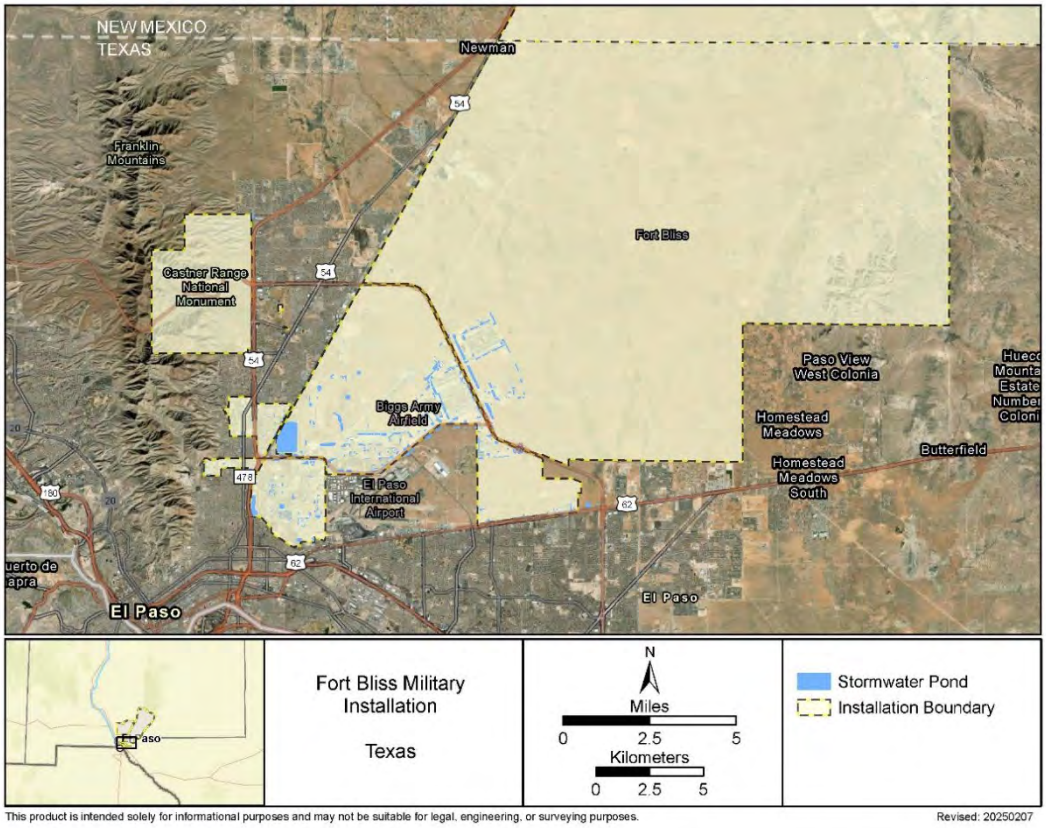

Figure 1.2 – Fort Bliss Army Installation, Texas

1.4 Local Rainfall Conditions

Fort Bliss is located in the Chihuahuan Desert that encompasses El Paso County. According to the National Oceanic and Atmospheric Administration (NOAA), U.S. Climate Normals, the average annual rainfall in the county is 9.9 inches, with most of the precipitation occurring during the months of July, August, and September (*NOAA NCEI U.S. Climate Normals Quick Access*, 2025). Nearly half of the annual precipitation is received during this time period. According to the National Park Service an arid region is defined as a region that receives less than 10 inches of rain per year. A semi-arid region receives 10 – 20 inches of rain per year (*National Park Service*, 2019). This classifies El Paso County as an arid region.

1.5 Urban Stormwater Infrastructure

Storm drainage in the urbanized areas of Fort Bliss consists mainly of curb and gutter surface drainage to inlets through pipes and channels to retention and detention basins. The majority of basins are retention basins serving BAAF and East Bliss.

Main Cantonment, where much of the historic and Cold War Era development is located, is served by a detention basin system with three lift stations conveying water to two very large in series basins operated by the City of El Paso. Within these City operated detention basins; runoff from Fort Bliss is mixed with runoff from large portions of the City of El Paso, before entry into the City of El Paso MS4 and discharge to the Rio Grande River (Figures 1.3a-f).

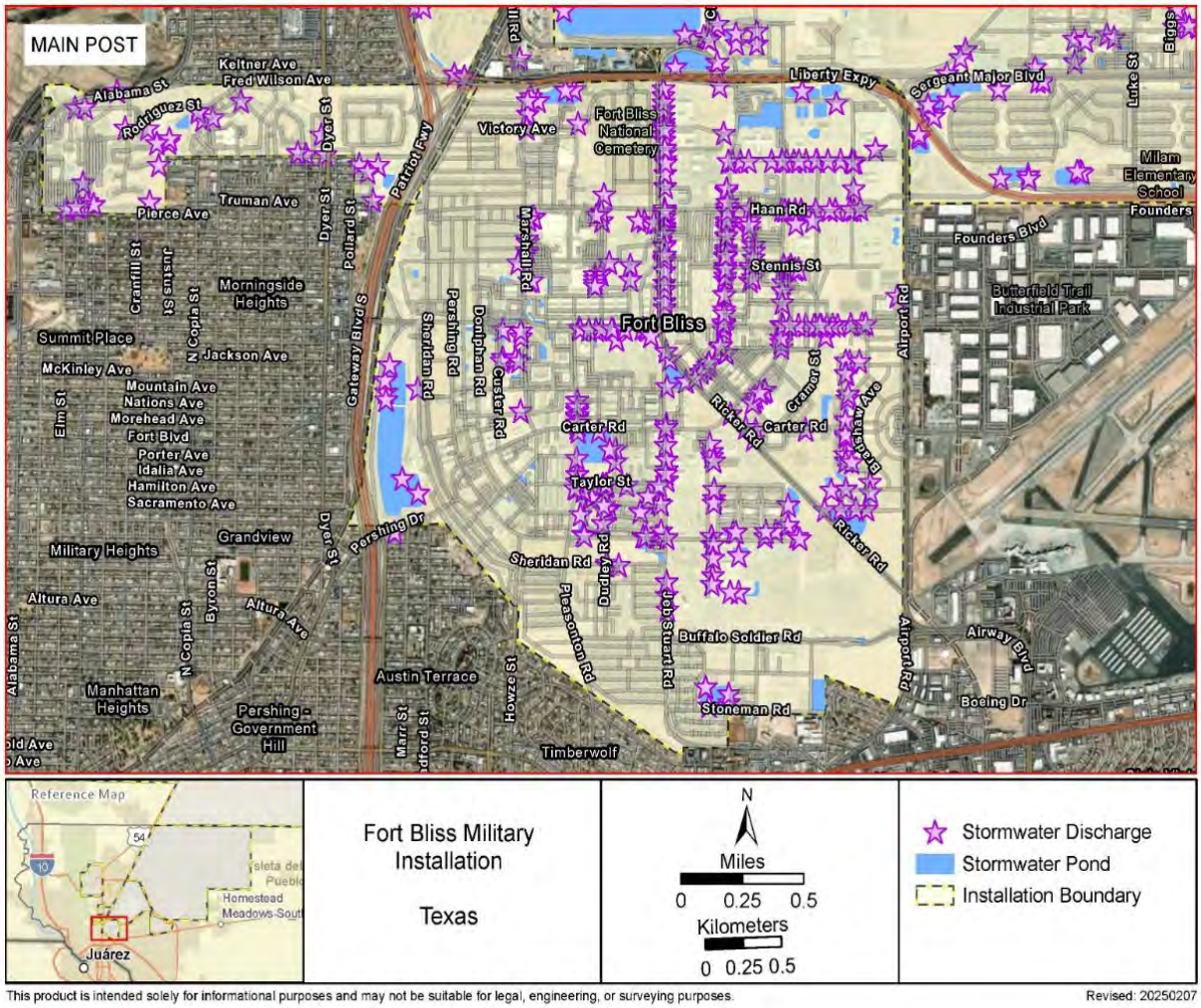

Figure 1.3a – Fort Bliss Army Installation, Main Cantonment

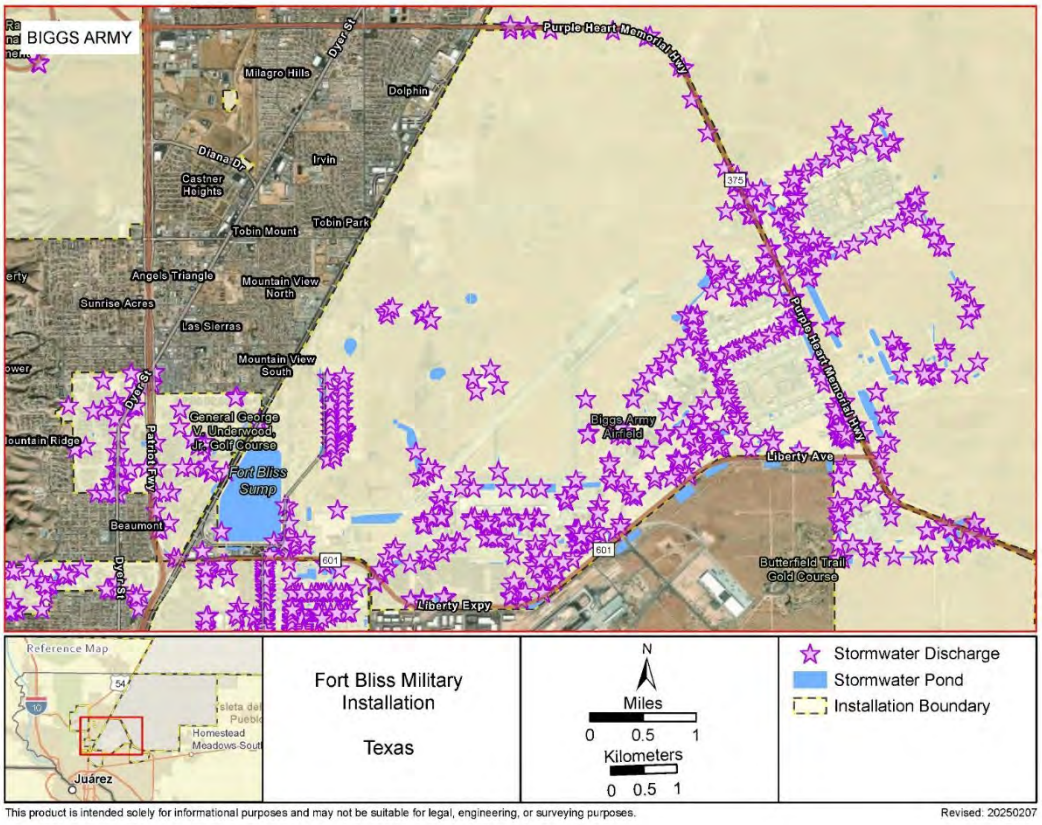

Figure 1.3b – Fort Bliss Army Installation, Biggs Army Airfield

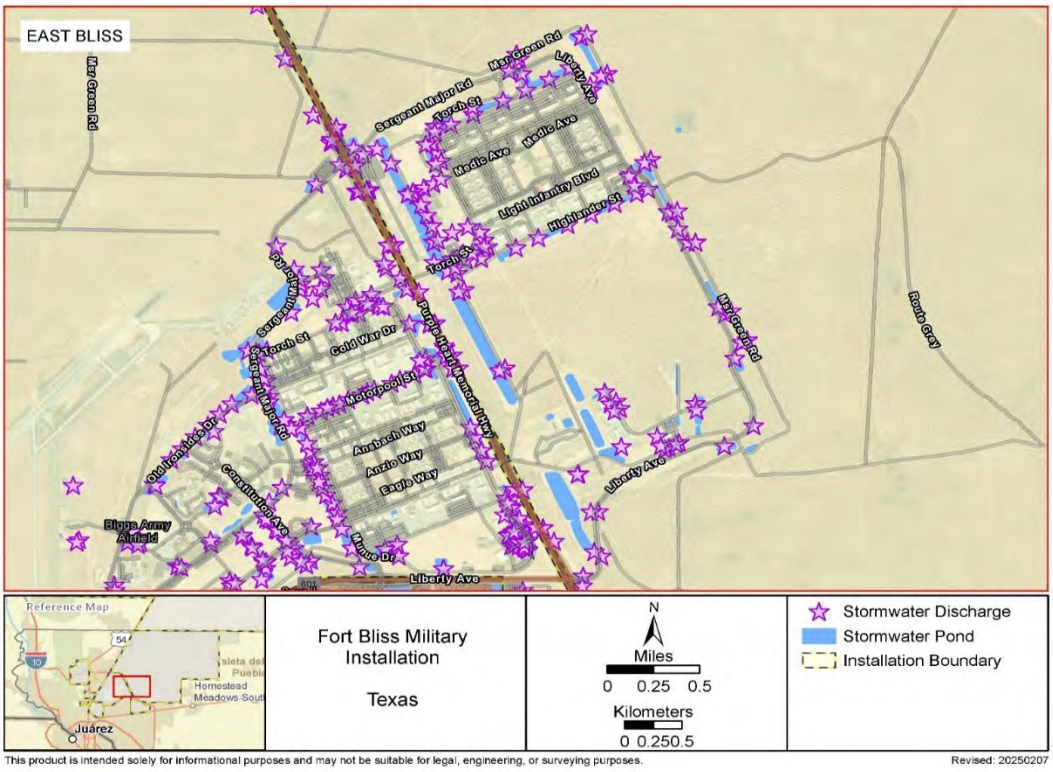

Figure 1.3c – Fort Bliss Army Installation, East Bliss

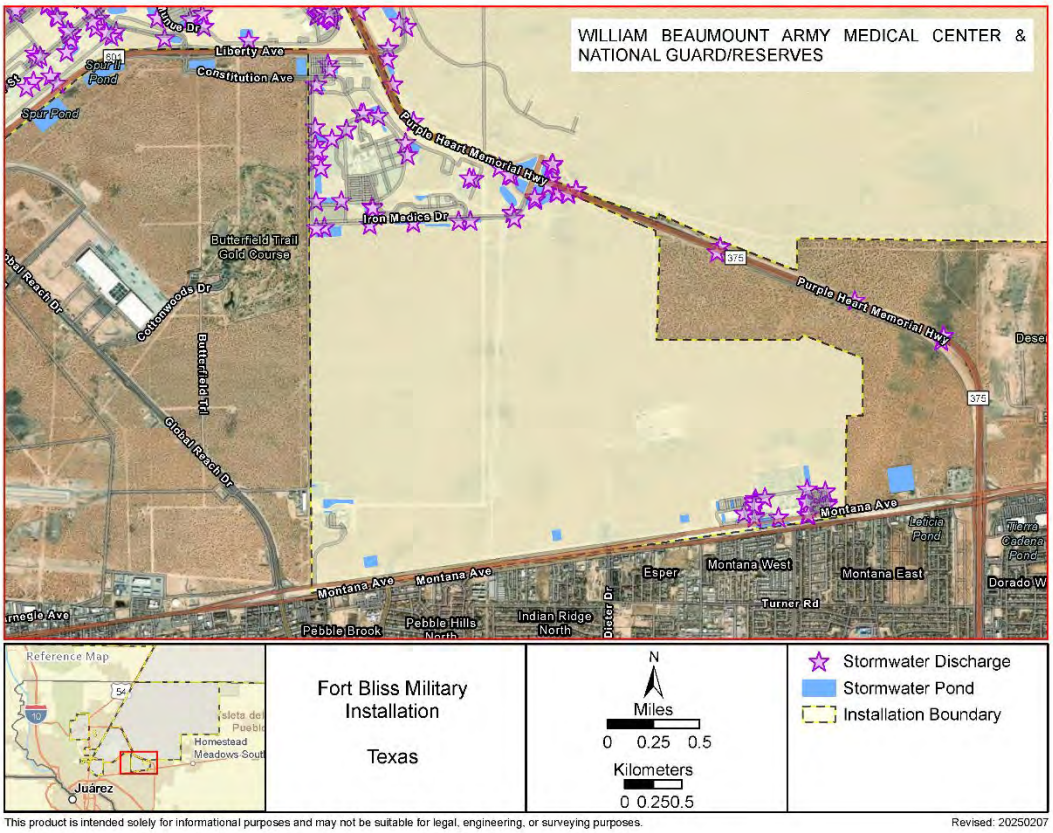

Figure 1.3d – Fort Bliss Army Installment, William Beaumont Army Medical Center

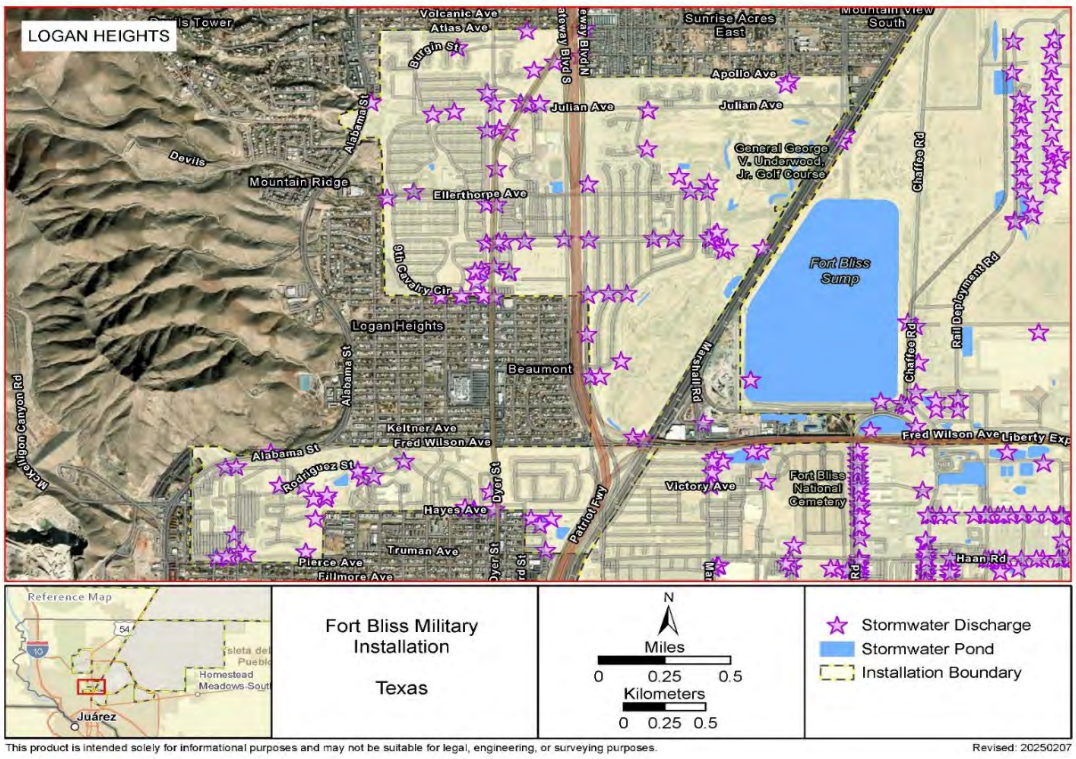

Figure 1.3e – Fort Bliss Army Installation, Logan Heights

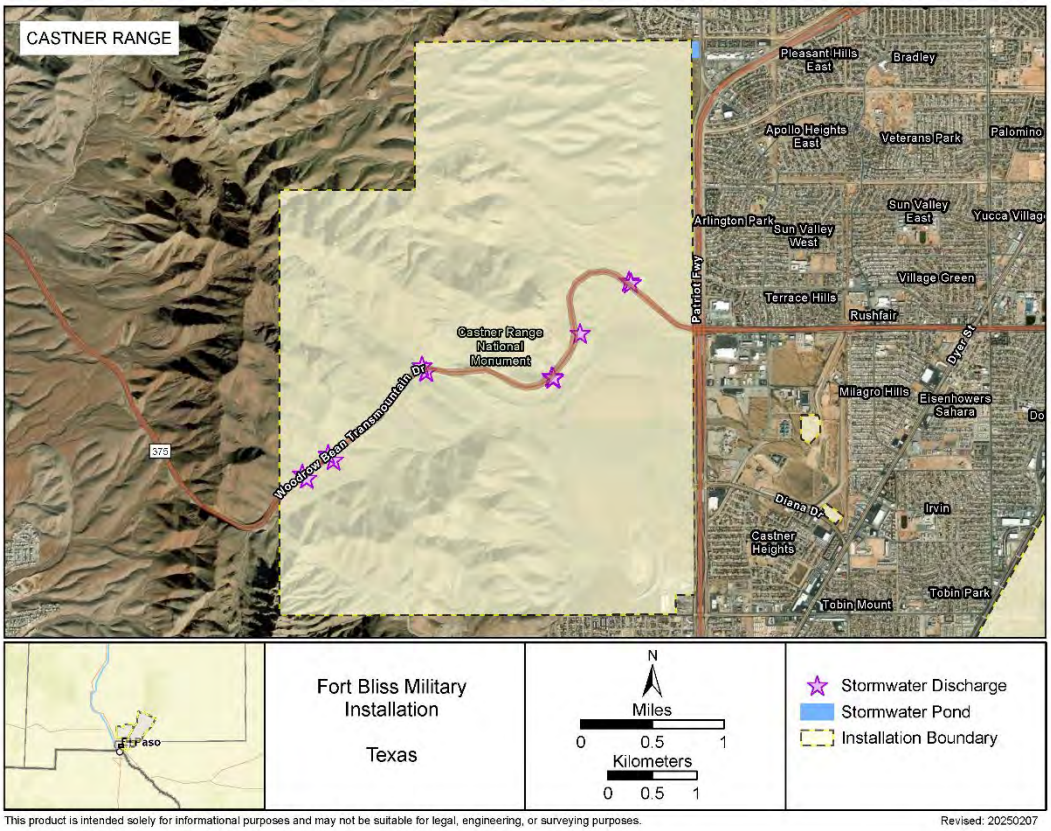

Figure 1.3f – Fort Bliss Army Installation, Castner Range

1.6 Regulatory Submissions

The operation of the Fort Bliss MS4 in compliance with the Texas General Permit TXR040000 is invoked via submission of the Notice of Intent (NOI) to Discharge and the certification of this Fort Bliss SWMP. The signed NOI is available in Appendix 2 and a copy of TXR040000 is provided in Appendix 3.

2.0 MINIMUM CONTROL MEASURES (MCM) AND BEST MANAGEMENT PRACTICES

MCMs are broad classes of pollution prevention activities defined by the permit and composed of BMPs or other methods selected and employed by the MS4 operator to prevent or reduce the release of pollutants into the stormwater systems. Each BMP including measurable goals, implementation schedule and responsible party is provided in the following section. For the purposes of the MCM, the public at Fort Bliss is the daytime on-post population further divided into target audiences consisting of Soldiers, workers, residents and visitors. The Soldier audience consists of military personnel stationed at Fort Bliss and involved in activity with work-related impacts to stormwater resources such

as motor pool or airfield operations. Similarly, workers are defined as civilian or veteran Federal employees or contract workers involved in activity with work-related stormwater impacts such as municipal operations or material handling. Residents are Soldiers, veterans and family dependents residing on Fort Bliss and visitors include on- and off-post residents shopping or engaging in recreation at Fort Bliss facilities. While each MCM and specific BMP may only target a subset of the entire population, the full range of MCM and BMPs are intended to reach the majority of the population served by the Fort Bliss MS4.

2.1 Public Education, and Outreach

The primary focus of the Public Education, and Outreach MCM is to educate the target audience on the connection between stormwater, the MS4 and the natural environment. The intent is to increase awareness in the community in order to reduce floatable (buoyant waste such as plastic bottles) which often consists of recyclable materials and that reduce the capacity of the MS4 and degrade downstream habitat and prevent illicit discharges into storm drains. Educational materials have been procured and additional material is developed and distributed as needed in the performance of each BMP.

2.1.1 Mark Drain

Storm drain marking occurs in tandem with the Inspect and Clean Storm Drains BMP (Section 2.3.4) in the Illicit Discharge Detection and Elimination MCM. The storm drain marking BMP serves the Public Education and Outreach MCM by informing the public how to identify storm drains, what they are connected to and that pollutants should not be discharged into them. The Fort Bliss MS4 storm drain marker is shown in Figure 2.1.

Figure 2.1 – Fort Bliss MS4 Storm Drain Marker

2.1.1.1 Measurable Goals

Drain marking is recorded in the storm drain inlet database. A minimum of 15% of all known stormwater inlets will be marked and maintained annually.

2.1.2 Stormwater Information Features

The Department of Public Works-Environmental Division (DPW-ED) will prepare stormwater information features and publish at least twice per year via Fort Bliss social media accounts that are featured to Soldiers, visitors and/or workers. This BMP will provide the public information and resources related to stormwater pollution prevention at Fort Bliss. This effort will also advertise the phone numbers available for the public to get more information or register stormwater-related complaints such as illegal dumping or illicit connection.

2.1.2.1 Measurable Goal

The measurable goal of this BMP will be the completion of the activity twice per year (minimum), four times a year (goal). Additional measurable goals are circulation of the publication and tracking of any responses.

2.1.3 Hazardous Waste Generator's Meeting

The Hazardous Waste Generator's Meeting is held monthly and is an excellent forum to interact with Soldiers and workers who are at facilities where maintenance of vehicles occurs and therefore are more likely to produce waste that may be washed down storm drains during rain events. Once a quarter, a stormwater team member will attend the meeting to discuss the impact stormwater discharges can have on local waterways, as well as the steps that can be taken to reduce pollutants in stormwater. To ensure attendance, this will be advertised via social media in tandem with BMP 2.1.2.

2.1.3.1 Measurable Goal

The measurable goal of this BMP is the frequency of the meeting attendance and attendance of the public.

2.2 Public Involvement and Participation

The purpose of this MCM is to involve the public and increase understanding that stormwater is not a waste but a resource. The intent is to increase awareness in the community in order to reduce floatable (buoyant waste such as plastic bottles) which often consists of recyclable materials and that reduce the capacity of the MS4 and degrade downstream habitat and prevent illicit discharges into storm drains.

2.2.1 Public Event Day Model

Annually, DPW-ED conducts an educational presentation to school-aged students intended to introduce the concept of stormwater-borne pollution and household practices to prevent stormwater pollution. Typically, the annual public event is a family-oriented event such as Earth Day, Earth Science Week or Armed Forces Day celebrations consisting of school field trips to a location such as a gym, a park or an event open to the public that may include other environmental-centered activities. DPW-ED utilizes an interactive landscape model for demonstrations and simulation of pollution and stormwater runoff that is appropriate for all ages. The landscape model focuses on improper disposal of waste and about the impact stormwater discharges can have on local waterways. The target audience for this BMP are residents and visitors. Fort Bliss has now been working with the adjacent community of El Paso by participating on such community events and striving to reach out a broader audience.

2.2.1.1 Measurable Goal

The measurable goal of this BMPMCM is the frequency of the event and attendance by school-aged students. Fort Bliss strives to attend at least two outreach events within a calendar year.

2.2.2 Environmental Officer Course

The Fort Bliss Environmental Officer Course is offered monthly. This course allows Soldiers and federal employees to learn about the importance of stormwater management and their roles in preventing the release of material into stormwater drains. This designated individual also coordinates with supporting permanent installation environmental staff for requirements, clarification and assistance. The overall objective of the course is to inform and support individuals to successfully adhere to environmental compliance requirements on behalf of their responsible Commander, Director or Supervisor.

2.2.2.1 Measurable Goal

The measurable goal of this BMP is the frequency of the meeting being a minimum of 6 times a year and the attendance of the public.

2.2.3 Stormwater Related Speaker Series – University of Texas at El Paso (UTEP)

The DPW-ED will be participating in a speaker series that will be given at the University of Texas at El Paso (UTEP). It will be directed at students that are studying Environmental Science and its related fields of study. There is a seminar for graduate students that is open to the public during both spring and fall semesters this event takes place weekly. DPW-ED will give a talk at least once annually that focuses on introducing the importance of stormwater management and their role in reducing floatable into stormwater drains.

2.2.3.1 Measurable Goal

The measurable goal of this BMP is the frequency of the speaker series being annual and attendance of the public.

2.3 Illicit Discharge Detection and Elimination

The Fort Bliss IDDE program is composed primarily of recurring inspections, training and education, and enforcement of existing policy via administrative action through the Chain of Command. Outreach activity including public education and extensive pollution prevention training encourages the public to report any illicit discharge to the installation Stormwater Compliance Manager at DPW-ED Building 624, Room 128 or by phone at (915) 568-3782 for further investigation and source identification.

2.3.1 Maintain Maps

The existing Fort Bliss stormwater system basin and inlet geographical information systems' layers and generated maps are updated throughout the permit period by field verifying new construction and visual inspection of all existing inlets on a regular schedule.

2.3.1.1 Measurable Goals

DPW revises and updates the following stormwater system databases in accordance to inspections. Basin, inlet, and secondary containment valve maps are based on data maintained in a database that is continually updated throughout the year. Revised maps are generated annually from the field verified data or more frequently if there are significant changes such as completion of new construction.

2.3.2 Conduct Training

DPW-ED holds the Environmental Officer Course, (BMP 2.2.2) Part of this training includes training on Illicit Discharge and Illegal Dumping. The purpose of this section of the course is to inform any staff that may come into contact or observe these issues in the field on proper procedures.

2.3.2.1 Measurable Goals

The measurable goal for this BMP is the frequency of this training and attendance.

2.3.3 Public Reporting of Illicit Discharges and Spills

The Fort Bliss IDDE program encourages public reporting of any illicit discharge to the installation Stormwater Compliance Manager at DPW-ED Building 624, Room 128 or by phone at (915) 568-3782 for further investigation and source identification.

This is also displayed online at -

Garrison Fort Bliss - DPW - Environmental Division

2.3.3.1 Measurable Goals

The measurable goal for this BMP is for DPW-ED to maintain these reporting mechanisms 100% of the time during the permit term.

2.3.4 Developing and Maintaining Procedures for Responding to Illicit Discharges, Illegal Dumping and Spills

Fort Bliss accomplishes regular inspections and maintenance of storm-drains through the installation maintenance contractor. These actions are documented in a storm drain inlets database. The storm-drain inlet database contains all the information necessary to confirm and track the status and location of individual storm-drain inlets on Fort Bliss. Data is entered for inspection of condition, marking, and cataloging activities, and Global Positioning System coordinates for each storm drain are confirmed and revised if needed. If undocumented storm drain inlets are found, their location and other information are used to create new entries in the database.

Each entry in the storm-drain inlet database (recorded storm drain inlet location) is field verified and inspected at a frequency of once annually. The date and results, including any changes or updates, are entered into the database and maintenance or repair are conducted as needed. If there is evidence of dry weather flow, illegal dumping or illicit discharge, it is recorded and reported to the DPW-ED Stormwater Compliance Manager for investigation and/or action. This procedure will also be reviewed and updated annually to address changes and make improvements where needed.

2.3.4.1 Measurable Goals

The measurable goal for this BMP is the frequency of inspections as well as the review process.

2.3.5 Source Investigation and Elimination

Findings from regular inspections of storm drain inlets and reports from the IDDE program will require prompt investigation. DPW-ED will respond to all reported incidents annually to trace and eliminate sources of pollution, safeguarding Fort Bliss' environmental and public health. For high priority discharges, such as sanitary sewer overflows, a response will be initiated within 24 hours to minimize potential impacts. TCEQ will be notified immediately if any illicit flows are believed to be an immediate threat to human health or the environment.

2.3.5.1 Measurable Goal
The measurable goal of this BMP to respond to 100% of known illicit discharges, illegal dumping within the appropriate timeframes.

2.3.6 Corrective Action

Upon concluding an investigation and identifying the source of illicit discharge or illegal dumping DPW-ED will initiate corrective measures to address the issue. The responsible party will be formally notified within 24 hours of the determination and will be required to implement corrective actions in order to eliminate future occurrences. DPW-ED will work closely with the responsible parties to ensure compliance under TCEQ standards.

2.3.6.1 Measurable Goal
The measurable goal of this BMP is to notify require responsible parties to eliminate illicit discharge.

2.3.7 Inspection Procedures

Inspection procedures as outlined above (BMP 2.3.3 - 2.3.6) shall be reviewed and updated annually to make sure they remain effective align with the installations needs. This will focus on identifying opportunities for improvement, addressing gaps in coverage, and incorporating feedback (BMP 2.3.8).

2.3.7.1 Measurable Goal
The measurable goal of this BMP is the frequency of the review and update process.

2.3.8 Inspection in Response to Complaints

Any complaints received regarding IDDE will require a timely response. This will be taken under review during the Inspection procedures (BMP 2.3.7). Follow up inspections will be conducted to assure the complaint has been resolved.

2.3.8.1 Measurable Goal
The measurable goal of this BMP is to respond to 100% of complaints.

2.4 Construction Site Runoff Control

In addition to the permitting of construction activity through the Texas Construction General Permit (CGP), Fort Bliss implements the following BMPs to enhance construction permit compliance.

2.4.1 Develop and Maintain Ordinance: Fort Bliss Construction Stormwater Pollution Prevention Plan (SWPPP) Guidance

The Fort Bliss Construction SWPPP Guidance is prepared and maintained by DPW-ED and provides operators of construction activity on Fort Bliss information on who is considered an operator under the various contracting mechanisms occurring on Fort Bliss and the three branches of the ED: Compliance, Conservation, and Pollution Prevention. Where Fort Bliss has requirements more specific that those stated in the CGP. A copy of the present version of the Fort Bliss Construction SWPPP Guidance is in Appendix 4.

2.4.1.1 Measurable Goals

This guidance is revised when there are changes to procedures, the permit, or if warranted, to address compliance problems identified during internal compliance inspections, or no less than every two years. This procedure was initiated in 2025.

2.4.2 NEPA Review: Prohibiting Discharges

The DPW has multiple ways to conduct a project based on installation needs. The Service Order Desk is currently operated 24/7/365 (including Holidays). The Service Order Desk receives requests by Phone, Walk-in and online for maintenance and repairs. Repairs and/or construction affecting land or real property on Fort Bliss that will exceed 32-hours labor in total requires additional oversight, review, and approval, therefore it is processed via an administrative process called the Work Order System; this includes all significant construction activity. As DPW receives Work Orders, they are subject to review by a board composed of representatives of the major Garrison functions such as Fire, Safety, Legal, Utilities, Engineering and Environmental Compliance, among others who ensure review and appropriate oversight for each project. It is during this process that determinations are made by the DPW-ED through the National Environmental Policy Act Review Process. The NEPA process begins when a federal agency develops a proposal to take a major federal action. These actions are defined at 40 CFR 1508.1. The environmental review under NEPA can involve three different levels of analysis:

1. Categorical Exclusion determination
2. Environmental Assessment/Finding of No Significant Impact
3. Environmental Impact Statement

The NEPA review process involves reviewing projects from the beginning of proposed project, through the multiple design phases, up to the Site Clearance and Line Marking Request (breaking ground). Allowing the Stormwater Program to identify if projects require additional documentation (such as the SWPPP), stormwater permitting, provide additional guidance and begin coordinating inspections as applicable with the project proponent.

2.4.2.1 Measurable Goals

The measurable goal for this BMP is to maintain a mechanism of prohibiting discharges through the completion of Work Order review and comment by DPW-ED Stormwater Compliance Manager for each Work Order Review assigned.

2.4.3 Maintain and Implement Site Plan Review Procedures

DPW-ED has a Construction Site Plan Tracker. This will have site plan procedures for all construction projects, reviewing projects from the beginning of proposed project, through the multiple design phases, up to the Site Clearance and Line Marking Request (breaking ground). The tracker and the NEPA work order process as outlined above (BMP 2.4.2) shall be reviewed at least once annually address changes to remain effective and align with the installations needs.

2.4.3.1 Measurable Goals

The measurable goal for this BMP is to implement site plan review procedures for 100% of new construction each year.

2.4.4 Procedures Large and Small Construction Projects

The NEPA review process outlined above (BMP 2.4.2) allows the Stormwater Program to identify and differentiate between small and large construction projects. This procedure determines if projects require additional documentation (such as the SWPPP), stormwater permitting, provide additional guidance and begin coordinating inspections as applicable with the project proponent. This procedure will be reviewed and updated annually. This review process will target areas for improvement, to best serve the goals on the installation.

2.4.4.1 Measurable Goals

The measurable goal for this BMP is the frequency of this review process.

2.4.5 Construction Site Inspections

DPW-ED team members conduct a minimum of two SWPPP site inspections of permitted construction site operators during the period of the active construction Notice of Intent. The inspectors record any findings, and the results are validated by the DPW-ED Stormwater Compliance Manager and provided to both the primary and secondary construction site operators for correction. This will be tracked under the Construction Site Plan Tracker (2.4.3) An example of the current version of the construction site inspection form is located in Appendix 5.

2.4.5.1 Measurable Goals

The measurable goal for this BMP is completion and recording of inspections of active construction sites for 80% (minimum) and 100% (goal) of all inspections annually.

2.4.6 Develop, Implement and Maintain Procedures for Receipt and Consideration of Information Submitted by the Public

The Fort Bliss Stormwater Program encourages the receipt and consideration of information regarding construction site stormwater runoff. This can be reported to the installation Stormwater Compliance Manager at DPW-ED Building 624, Room 128 or by phone at (915) 568-3782 for further investigation and source identification.

This is also displayed online at -

Garrison Fort Bliss - DPW - Environmental Division

2.4.6.1 Measurable Goals

The measurable goal for this BMP is for DPW-ED to maintain these reporting mechanisms 100% of the time during the permit term.

2.4.7 Training for DPW-ED Stormwater Team

DPW-ED will develop and provide annual CGP SWPPP training on construction site runoff control requirements to DPW-ED Stormwater team and technicians. Training will be developed and provided and will focus primarily on construction permit compliance with a secondary emphasis on illicit discharge detection and elimination. This will be required for all stormwater team members on an annual basis.

2.4.7.1 Measurable Goals

The measurable goal for this BMP is attendance and frequency of this training.

2.5 Post-Construction Stormwater Management in New Development and Redevelopment

2.5.1 Develop and Maintain Ordinance: EISA Design Requirement

Post Construction Runoff Control, including Low Impact Development (LID) techniques, are incorporated into the construction project planning stage via requirements of Section 438 of the Energy Infrastructure Security Act (EISA). The Fort Bliss implementation of the EISA Section 438 is accomplished by requiring the design of construction projects greater than 5,000 square feet in area to follow, at a minimum, the Technical Guidance on Implementing the Stormwater Runoff Requirements for Federal Facilities under Section 438 of the Energy Infrastructure Security Act (EPA 841-B-09-001). Construction projects in the planning stage are reviewed by the installation Stormwater Compliance Manager via the NEPA Work Order review process (see section 2.4.2), and designers are informed of the EISA LID requirement and provided the technical guidance and 95th percentile design storm value for the proposed site location.

2.5.1.1 Measurable Goals

The measurable goal for this BMP is for the DPW-ED Stormwater Compliance Manager to complete and provide comments on at least 600 work order reviews annually.

2.5.2 Document and maintain records: Site Inspection Tracking Database

The DPW-ED is developing a database to keep track of all construction projects. This will keep track of all developments, redevelopments, and enforcement actions taken. The start of tracking will begin in February 2025; however, all records are also kept within the NEPA Tracker (BMP 2.4.2).

2.5.2.1 Measurable Goals

The measurable goal for this BMP is to maintain records of 100% of enforcement actions taken each year. Make 100% of enforcement records available to TCEQ for review within 24 hours of request.

2.5.3 Ensure Long Term Post Construction Stormwater Management in New Development and Redevelopment

Successful final stabilization for portions of construction projects where landscaping (typically landscape fabric overlain by decorative gravel) is not applied is difficult to achieve with the highly erodible desert soils of Fort Bliss. Wind erosion of disturbed soils tends to continue long after construction has ceased until native plants are established. The Fort Bliss Final Stabilization BMP would require of Construction General Permit regulated sites to install straw wattles on contour at a spacing determined by the gradient of the site. Straw wattles are more resistant to sun and wind than silt fences over the long time period needed to achieve final stabilization of disturbed soil in an arid environment. Final vegetative stabilization for arid or semi-arid areas requires that 70 percent or more of restoration is required, made of vegetation native to local undisturbed areas.

Development of this BMP will include establishment of a standard operating procedure including design parameters for final stabilization using these techniques to be implemented by the end of Year 4 of the permit.

2.4.3.1 Measurable Goals

Once completed in Year 4, implementation via Construction Review Process (Section 2.3.2) of the final stabilization standard operating procedure will be the measurable goal for this BMP.

2.6 Pollution Prevention and Good Housekeeping for Municipal Operations

2.6.1 Inspect all Permit Listed Facilities and Control Inventory

The MS4 permit requires that all Texas facilities owned by the permit operator that engage in potentially polluting activities within the urbanized area that could affect stormwater quality are inspected for verification of permit requirement compliance and identification of compliance failures for correction.

Scheduling of inspections will coincide with scheduling of MS4 Stormwater Compliance Training. When facility personnel are trained, the facility will also be inspected for MS4 permit requirement compliance including Fort Bliss activity specific BMPs. The current list of these 12 BMPs is located in Appendix 6 and a copy of the current stormwater inspection checklist is located in Appendix 7. Fort Bliss developed this activity based BMPs from the most common municipal and military activities and equipment at Fort Bliss that are likely to result in discharge of pollutants to stormwater. These BMPs, which are also cited in the installation Multi Sector General Permit (MSGP) SWPPP, are specifically used in the training of Fort Bliss Soldier and worker personnel.

2.5.2.1 Measurable Goals

The intended goal of the inspections of permit facilities is the identification and correction of compliance failures. Discovered issues will be tracked via DPW-ED internal analysis and database. The site Environmental Officer or shift supervisor will be directed to discovered compliance issues and instructed on the procedure for correcting issues. If necessary, follow-up inspections will be conducted to verify correction of discovered compliance issues. Continued inclusion of these BMPs in installation MSGP and MS4 plans, and training will occur through all years of the permit. The measurable goal will be training annual attendance and plan completion.

2.6.2 Train All Permit Listed Facilities

All personnel conducting potentially polluting activity outdoors within the urbanized area are to be trained annually in stormwater pollution prevention. This will include significant numbers of contracted companies and their employees, military motor pools and other facilities operating on Fort Bliss property.

The DPW-ED conducts scheduling of training of staff with outdoor related responsibilities at facilities based on five types of activities listed below in Table MS4-1. The list of facilities requiring training for employees is maintained based on the MS4 permit requirements and the master Environmental Performance Assessment System (EPAS) Inspection List. The EPAS Inspection List includes each facility permit registration or identification number and serves as the MS4 permit required facility inventory. DPW-ED will complete an annual training session for personnel of each EPAS List facility throughout each year of the 5-year permit period. Rescheduling will be performed as necessary based on attendance and performance.

Table MS4-1 – Training Subjects and Applicability

		Soldier	Worker
1	Motor Pool & Vehicle Maintenance	X	X
2	Municipal Services		X
3	Storage & Maintenance	X	X
4	Commercial & Recreation		X
5	Illicit Discharge/Construction Activity		X

Training has been developed focused on potentially polluting activities at facilities staffed by Soldiers, civilian or contract workers. Training material structure is outlined in Table MS4-1 – Training Subjects and Applicability. Visual presentations have been created to cover all necessary regulatory requirements for the multiple types of facility activities that operate on Fort Bliss, including (1) military motor pools and other vehicle maintenance facilities, (2) municipal services facilities, (3) storage and maintenance yards, (4) recreation and commercial facilities (such as golf courses), and (5) DPW inspectors. Scheduled training sessions will include the applicable presentation and a follow-up awareness survey or test immediately after.

2.6.2.1 Measurable Goals

All completed training sessions will include sign-in sheets to verify attendance. Additionally, all students will either fill out an awareness survey or complete a subject test immediately after the training session, based on permit year (see Table MS4-2). Permit years 1, 3, and 5 will include a subject test. The test will include questions pertaining to appropriate regulations and regulated activities. The class will be required to attain at least a 70% passing rate in order to be considered as having completed the training. Permit years 2 and 4 will include an awareness survey that gathers the students' general knowledge of stormwater practices and pollution prevention.

Table MS4-2 – Training Data Collection and Reporting

		Test	Awareness Survey	Reporting
Permit Year	1	X		Subject performance analysis
	2		X	Information targeting analysis
	3	X		Subject performance analysis
	4		X	Information targeting analysis
	5	X		Subject performance analysis

The compiled data is recorded in a spreadsheet and is currently being used to focus the stormwater training program. It will also be used to compose annual reporting for the years 1 through 5. This report will be used in conjunction with the compiled data to plan stormwater compliance activities for each of the following permit years. It is expected that some specific details of program implementation will be updated year by year based on the cumulative subject performance analysis and information targeting analysis data gathered in continuing permit years. Finally, the collected data will be used in the creation of the annual TCEQ MS4 permit report.

2.6.3 Disposal of Waste Material

Fort Bliss has several methods of disposing of waste material. The Qualified Recycling Program is an installation wide recycling program that helps recycle various commodities such as scrap metal, lead acid batteries, ink & toner cartridges, brass and pallets. Solid waste is collected and disposed of by a third-party contractor and taken to the Greater El Paso Landfill. Hazardous waste is not treated on Fort Bliss and is also collected by a third part contractor. DPW-ED has a Hazardous Waste Management Plan to ensure it is compliance.

2.6.3.1 Measurable Goals

The measurable goal for this BMP is that 100% of waste from the MS4 is disposed of in proper accordance with Texas Administrative Code (TAC) 30, 330, 335.

2.6.4 Contractor Requirements and Oversight – Annual Training with Contractors

The DPW-ED has annual trainings with all the contractors hired. This training is held to stormwater control measures, good housekeeping practices, and facility-specific stormwater management operating procedures. Oversight procedures will be written into their contracts to establish appropriate control measures and SOP's. These procedures will be maintained on-site and available to TCEQ within 24 hours of request.

2.6.4.1 Measurable Goals

This goal of this BMP is the attendance and frequency of this training.

2.6.5 Assessment of Permitee-Owned Operations

Through the NEPA review process (BMP 2.4.2) DPW-ED receives work order tickets from the OMD. Every work order is reviewed for their potential to discharge pollutants in stormwater. This includes road and parking lot maintenance, bridge maintenance, cold weather operations, and right of way maintenance.

2.6.5.1 Measurable Goals

This goal of this BMP is to evaluate 100% of OMD activities through the NEPA review process.

2.6.6 Identify Pollutants of Concern

Any pollutants of concern that could be discharged from any OMD activities described above (BMP 2.6.5) and maintain a list of 100% of pollutants identified. These findings will then be reviewed, and ED will meet annually with the rest of DPW The purpose of this meeting is to address changes in OMD activities that work to reduce pollutants where applicable.

2.6.6.1 Measurable Goals

This goal of this BMP is the frequency of this meeting being annual and maintaining records of all pollutants.

2.6.7 Pollution Prevention Measures

The DPW-ED will implement the following pollution prevention measures that will reduce the discharge of pollutants in stormwater within Fort Bliss:

a. Replace at least 50% of the MS4's materials and chemicals with more environmentally friendly materials or methods by the end of the permit term.
b. Track 100% of the application of deicing and anti-icing compounds in the MS4 area and record the amount of compound used for each application annually.

2.6.7.1 Measurable Goals

This goal of this BMP implements these pollution prevention measures.

2.6.8 Inspection of Pollution Prevention Measures

The Pollution Prevention branch within DPW-ED implements and oversees the measures above (2.6.7). These methods will be visually inspected once annually to 100%. There will be a procedure in place to record the frequency of inspections and how they will be conducted. This process will be reviewed annually to address changes or additions to the pollution prevention measures that best reflect the needs of the installation.

A log of 100% of inspections will be maintained and made available for TCEQ within 24 hours of request (2.6.6)

2.6.8.1 Measurable Goals

This goal of this BMP is the frequency of inspections and maintaining a log of 100% of inspections.

2.6.9 Structural Control Maintenance

Through the implementation of the Spill Prevention and Countermeasure Control Plan, DPW-ED requires secondary containment for any mobile fuel tanker at any cantonment, airfield, railroad, or other permanent transportation facility. Each permanently constructed secondary containment valve location includes a marker indicating the valve should be kept in the closed position. The inspection is done at least once annually and includes exercising the valve to confirm its function, ensuring it is closed and re-installation, if needed, of markers with the phrase "Keep Valve Closed". Written procedures for this inspection process and records of all inspections are recorded in a Structural Control Database. Additionally, all other stormwater drains are inspected by DPW. They oversee the inspection, record keeping of these structures.

All work orders are submitted through the NEPA process (BPM 2.4.2) when maintenance is needed to any stormwater structures throughout Fort Bliss. Annually DPW-ED meets with OMD (BMP 2.6.6) to go over the inspection process to address changes or make improvements that will best reflect the goals of the installation.

2.6.8.1 Measurable Goals

This goal of this BMP is the frequency of inspections, and maintaining a log of 100% of inspections

3.0 REPORTING

3.1 Introduction

The following subsections describe the frequency of reporting and required report content, along with record keeping requirements, as required by the Texas General Permit TXR040000.

3.2 Reporting Frequency

Reports must be submitted annually for the duration of the permit. The reports are to be submitted to the TCEQ by March 31 of each permit year, to the following address:

Texas Commission on Environmental Quality
Stormwater and General Permits Team; MC-148
P.O. Box 13088
Austin, TX 78711-3088

3.3 Required Report Content

There are seven essential items that must be included in the annual reports submitted by Fort Bliss to the NPDES permitting authority (TCEQ). The items are listed below:

a. Status of compliance with permit conditions, including an assessment of the appropriateness of the selected BMPs and progress toward achieving the selected measurable goals for each of the six MCMs.

b. Results of any information collected and analyzed pertaining to stormwater management, including monitoring data, if any.

c. A summary of the stormwater activities planned for the next reporting cycle.

d. Any proposed changes to the SWMP, including proposed changes to BMPs or measurable goals for any MCM.

e. The number of operator-controlled construction activities authorized under this general permit, and the total number of acres disturbed.

f. The number of construction activities that occurred within the MS4 but were not under control of the MS4 entity (i.e., US Army Corps of Engineers-controlled construction activities).

g. Notice of relying on another governmental entity to satisfy some of the permit obligations (if applicable).

4.0 Record Keeping

4.1 Record Keeping Requirement

Records required by the NPDES permitting authority i.e., TCEQ must be kept for at least 3 years and made accessible to the public at reasonable times during regular business hours. Records need not be submitted to the NPDES permitting authority unless the permittee is requested to do so.

References

National Park Service. (2019, September 13). *Arid and semi-arid region landforms - geology (U.S. National Park Service)*. Www.nps.gov. https://www.nps.gov/subjects/geology/arid-landforms.htm

NOAA NCEI U.S. Climate Normals Quick Access. (2025). Noaa.gov. https://www.ncei.noaa.gov/access/us-climate-normals/#dataset=normals-annualseasonal&timeframe=30&location=TX&station=USW00023044

APPENDIX 1

Certifications

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OPERATOR CERTIFICATION

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

//ORIGINAL SIGNED//

_____ _____

Gregory A. Williams, PMP, CEM
Director of Public Works
Fort Bliss, Texas

Date

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APPENDIX 2

Copy of Notice of Intent

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APPENDIX 3

Permit TXR040000

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APPENDIX 4

SWPPP Construction Guidance

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APPENDIX 5

Construction Checklist

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APPENDIX 6

Best Management Practices

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APPENDIX 7

Stormwater Annual Inspection Checklist

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