

UNIVERSITY OF ILLINOIS  
AT URBANA-CHAMPAIGN

Facilities & Services

Physical Plant Services Building  
1501 S. Oak Street  
MC-800  
Champaign, IL 61820-6905



May 24, 2017

Illinois Environmental Protection Agency  
Division of Water Pollution Control  
Compliance Assurance Section  
Municipal Annual Inspection Report  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794-9276

RE: 2016-2017 Annual Facility Inspection Report  
Municipal Separate Storm Sewer Systems (MS4)  
National Pollutant Discharge Elimination System (NPDES) Permit No. ILR400523  
University of Illinois at Urbana-Champaign (University)

Dear Sir or Madam:

Enclosed is the Annual Facility Inspection Report required by the University's MS4 NPDES permit. This report covers the period from April 1, 2016 to March 31, 2017. If you have any questions regarding the information contained in this report, please contact Jason Jones at (217) 300-1897.

Sincerely,

A handwritten signature in blue ink that reads "David B. Wilcoxon". The signature is fluid and cursive, with a long horizontal stroke at the end.

David B. Wilcoxon  
Director, Environmental Compliance

Enclosure



# Illinois Environmental Protection Agency

Bureau of Water • 1021 N. Grand Avenue E. • P.O. Box 19276 • Springfield • Illinois • 62794-9276

## Division of Water Pollution Control ANNUAL FACILITY INSPECTION REPORT

### for NPDES Permit for Storm Water Discharges from Separate Storm Sewer Systems (MS4)

*This fillable form may be completed online, a copy saved locally, printed and signed before it is submitted to the Compliance Assurance Section at the above address. Complete each section of this report.*

Report Period: From March, 2016 To March, 2017

Permit No. ILR40 0523

#### MS4 OPERATOR INFORMATION: (As it appears on the current permit)

Name: University of Illinois at Urbana Champaign Mailing Address 1: 1501 South Oak Street  
Mailing Address 2: \_\_\_\_\_ County: Champaign  
City: Champaign State: IL Zip: 61820 Telephone: 217-333-3365  
Contact Person: David B. Wilcoxen Email Address: dwilcoxe@illinois.edu  
(Person responsible for Annual Report)

#### Name(s) of governmental entity(ies) in which MS4 is located: (As it appears on the current permit)

University of Illinois at Urbana Champaign

#### THE FOLLOWING ITEMS MUST BE ADDRESSED.

A. Changes to best management practices (check appropriate BMP change(s) and attach information regarding change(s) to BMP and measurable goals.)

- |  |                                     |   |                          |
|--|-------------------------------------|---|--------------------------|
| 1. Public Education and Outreach             | <input type="checkbox"/>            | 4. Construction Site Runoff Control       | <input type="checkbox"/> |
| 2. Public Participation/Involvement          | <input type="checkbox"/>            | 5. Post-Construction Runoff Control       | <input type="checkbox"/> |
| 3. Illicit Discharge Detection & Elimination | <input checked="" type="checkbox"/> | 6. Pollution Prevention/Good Housekeeping | <input type="checkbox"/> |

B. Attach the status of compliance with permit conditions, an assessment of the appropriateness of your identified best management practices and progress towards achieving the statutory goal of reducing the discharge of pollutants to the MEP, and your identified measurable goals for each of the minimum control measures.

C. Attach results of information collected and analyzed, including monitoring data, if any during the reporting period.

D. Attach a summary of the storm water activities you plan to undertake during the next reporting cycle ( including an implementation schedule.)

E. Attach notice that you are relying on another government entity to satisfy some of your permit obligations (if applicable).

F. Attach a list of construction projects that your entity has paid for during the reporting period.

**Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))**

Owner Signature:

David Wilcoxen

Printed Name:

5/24/17

Date:

Director, Environmental Compliance

Title:

EMAIL COMPLETED FORM TO: [epa.ms4annualinsp@illinois.gov](mailto:epa.ms4annualinsp@illinois.gov)

or Mail to: ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
WATER POLLUTION CONTROL  
COMPLIANCE ASSURANCE SECTION #19  
1021 NORTH GRAND AVENUE EAST  
POST OFFICE BOX 19276  
SPRINGFIELD, ILLINOIS 62794-9276

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY ANNUAL  
FACILITY INSPECTION REPORT

NPDES PHASE II PERMIT FOR STORMWATER DISCHARGES  
FROM  
MUNICIPAL SEPARATE STORM SEWER SYSTEMS

UNIVERSITY OF ILLINOIS at URBANA-CHAMPAIGN  
NPDES Permit No. ILR 400523

**REPORTING PERIOD:**

April 2016 to March 2017

**MS4 OPERATOR INFORMATION:**

University of Illinois at Urbana-Champaign  
1501 S. Oak Street  
Champaign, Illinois 61820  
(217) 265-9828  
David Wilcoxon  
Director, Environmental Compliance

**GOVERNMENTAL ENTITY IN WHICH MS4 IS LOCATED:**

University of Illinois at Urbana-Champaign

**INTRODUCTION/BACKGROUND:**

The 1987 amendments to the Clean Water Act required the United States Environmental Protection Agency (USEPA) to address storm water runoff in two phases. Phase I of the National Pollution Discharge Elimination System (NPDES) Storm Water Program became effective in 1990. Phase I of the NPDES Storm Water Program applied to large and medium MS4s and eleven industrial categories including construction sites disturbing 5 or more acres of land. Phase II of the NPDES Storm Water Program became effective March 10, 2003 and is applicable to small MS4s and construction sites disturbing between 1 and 5 acres of land. Phase II also expands the industrial “no exposure” exemption from Phase I. The Illinois Environmental Protection Agency (IEPA) is in charge of implementing both phases of the NPDES Storm Water Program.

As a small MS4, the University was required to comply with Phase II of the NPDES Storm Water Program by submitting a Notice of Intent (NOI) to IEPA by March 10, 2003. The NOI serves as the application documentation for the NPDES Phase II Permit that applies to storm water discharges from storm sewers and drainage ways within the University’s MS4’s boundary for a permit period of five (5) years. The NOI outlined a plan of implementation for six minimum control measures with a target to improve storm water quality.

Those six minimum control measures are:

1. Public Education and Outreach
2. Public Participation and Involvement
3. Illicit Discharge Detection and Elimination
4. Construction Site Runoff Control
5. Post-construction Runoff Control
6. Pollution Prevention and Good Housekeeping

The University has developed a plan to address the six minimum control measures over the term of their NPDES Phase II Permit. As a part of the NOI, the University defined Best Management Practices (BMPs) for each minimum control measure and established measurable goals for each. BMPs were chosen that reflect the desire to build upon existing University programs already in place at this time.

The University works in cooperation with other MS4s in the urbanized area to share costs and common efforts to develop a regional consistency in BMPs towards fulfilling the requirements of the NPDES Phase II Storm Water Program. The MS4 Technical Committee continues to meet and include the University, City of Champaign, City of Urbana, Village of Savoy and Champaign County.

The University submitted its second NOI to IEPA on January 7, 2008. The University received its 2009-2014 ILR40 NPDES permit on February 26, 2009.

On February 19, 2014, the University was subject to a MS4 Audit performed by IEPA. A thorough review of the University's records showed general compliance with their ILR40 Permit.

The third NOI was submitted to IEPA on September 30, 2013. The University received its 2016-2021 ILR40 NPDES permit on February 11, 2016.

This document serves as the report for Year 2 of the third ILR40 NPDES permit issued.

#### **PERMIT COMPLIANCE ASSESSMENT:**

The University proposed in last year's annual report to implement forty-eight (48) BMPs during Year 1 of its third MS4 permit cycle to address the required minimum control measures. The University took an aggressive approach by implementing all BMPs and exceeding performance goals for six of them. The University exceeded its BMP performance goals in three of the required control measures: Public Education and Outreach; Public Participation and Involvement; and Pollution Prevention and Good Housekeeping.

For details regarding the implementation of the Year 1 BMPs, please refer to **Attachment A - Permit Cycle 3, Year 1 NPDES Storm Water Activity Report**.

#### **MONITORING AND ASSESSMENT PROGRAM:**

As stated in the Monitoring and Assessment Program Update letter prepared by the University and submitted to the IEPA on August 30, 2016, the University will comply with the monitoring and assessment program requirements by implementing an annual assessment of physical/habitat characteristics of stream bank erosion caused by stormwater discharges. Accordingly, the University collaborated with a fellow MS4 Technical Committee member to implement an annual assessment of the accessible areas of Boneyard Creek through the University's campus. The City of Urbana will extend the limits of their annual Boneyard Creek inspection to include the accessible areas of Boneyard Creek on

campus. The inspection report will be provided to the University for review and action as necessary. General comments regarding the assessment of the physical/habitat characteristics of the stream will be included in future Annual Facility Inspection Reports from the University.

#### **STORM WATER ACTIVITIES FOR YEAR 2 OF THIRD PERMIT CYCLE:**

The Year 2 BMP Summary for the current MS4 storm water discharge permit cycle as proposed in the NOI submitted to IEPA on September 30, 2013, with updates incorporated in previous annual reports, is included as **Attachment B – Permit Cycle 3, Year 2 Proposed NPDES Storm Water BMPs**. Attachment B describes the University's proposed storm water activities for April 1, 2017 to March 31, 2018.

#### **CHANGES TO BMPs:**

Please refer to **Attachment C – Permit Cycle 3, Year 2 Changes to Storm Water BMPs**. This table outlines modifications made in response to the ILR40 permit requirements and changes in University practices.

#### **OTHER GOVERNMENTAL ENTITY RELIANCE:**

The University continues to participate in and share resources with the MS4 Technical Committee. The Cities of Urbana and Champaign have a written agreement with the University to provide street sweeping services to University streets. The City of Urbana has agreed to conduct annual inspections of accessible areas of the Boneyard Creek through campus and report findings to the University. The Boneyard Creek Community Day, Fall Clean Up Day (iHelp), and the Illinois Green Infrastructure Conference are other collaborative events that successfully accomplish the goals of cleaning up the community and providing public education.

#### **PERMIT CYCLE 3, YEAR 2 CONSTRUCTION PROJECTS:**

University projects that disturbed one acre or more between April 1, 2016 and March 31, 2017 and their associated completion status are listed below:

- Integrated Bioprocessing Research Laboratory – In Process
- Ikenberry Commons Residence Hall 3 – Complete
- State Farm Center – Complete

# **Attachment A**

## Permit Cycle 3, Year 1 NPDES Storm Water Activity Report

### Attachment A - Permit Cycle 3, Year 1 Storm Water Activity Report

BMP ID	BMP Category	BMP Subcategory	BMP Description	Year 1 Goal Milestone	Year 1 Activities	Year 1 Status
A.1.1	Public Education and Outreach	Distribute Paper Material	Stormwater fact sheet and posters on Safety & Compliance Website	Post materials.	Maintained 5 outreach posters on S&C website.	Complete (✓)
A.1.2	Public Education and Outreach	Distribute Paper Material	Press Release	Publish one press release.	Published one press releases in the News Gazette for the Boneyard Creek Community Day (BCCD) and MS4 Groups were featured in Smile Politely and WCIA News.	Exceeded Goals (+)
A.1.3	Public Education and Outreach	Distribute Paper Material	Stormwater Website	Continue updating website.	Maintained a stormwater website. URL is <a href="http://fs.illinois.edu/services/safety-and-compliance/about-the-program">http://fs.illinois.edu/services/safety-and-compliance/about-the-program</a>	Complete (✓)
A.2.2	Public Education and Outreach	Speaking Engagement	Information presentation or information booth.	Make one presentation or staff one booth.	A University representative staffed a booth and provided information to volunteers and the public at the Boneyard Creek Community Day event.	Complete (✓)
A.3.1	Public Education and Outreach	Public Service Announcement	Social media, radio, television and internet announcements	Broadcast or publish one PSA.	Facilities and Services posted multiple times on the Facebook page. A 30-second audio PSA and a new podcast on the Boneyard Creek is available on the stormwater website. University representative appeared on local television news station and newspapers to promote local stormwater cleanup event.	Exceeded Goals (+)

### Attachment A - Permit Cycle 3, Year 1 Storm Water Activity Report

BMP ID	BMP Category	BMP Subcategory	BMP Description	Year 1 Goal Milestone	Year 1 Activities	Year 1 Status
A.4.1	Public Education and Outreach	Community Event	Biennial Green Infrastructure Conference	Carry out conference	The Illinois Green Infrastructure Conference took place on September 15, 2016.	Complete (✓)
B.1.1	Public Participation & Involvement	Public Panel	Participation by the campus community and students in campus storm water initiatives (i.e. Illinois Climate Action Plan, Sustainable Working Advisory Teams, Student Sustainability Committee)	Continue to involve the campus community and students in the various storm water initiative groups on campus.	The iCAP, Student Sustainability Committee, the Institute for Sustainability, Energy and Environment, and the Facilities and Services Sustainability office continue to involve the campus community in campus storm water initiatives.	Complete (✓)
B.3.1	Public Participation & Involvement	Stakeholder Meeting	Meet with stakeholder group	Meet once.	A University representative from Facilities and Services is a member of the Water and Stormwater Sustainability Working Advisory Team (SWATeam). This team focuses upon conserving potable water and handling stormwater in a sustainable manner. The SWATeam continues to meet multiple times each year.	Exceeded Goals (+)
B.4.1	Public Participation & Involvement	Public Hearing	Provide opportunity for public input on the Storm Water Program including discussion of EJ areas within MS4 jurisdiction.	Conduct annual public meeting. Review and evaluate potential EJ areas using EPA's EJ Screen tool.	The University reviewed EPA's EJ Screen tool and found no apparent EJ areas on campus. The annual public meeting was held on February 15, 2017.	Complete (✓)
B.6.1	Public Participation & Involvement	Program Involvement	Quarterly MS4 Committee meetings	Meet four times.	The Cooperating MS4s met four times (5/20/16; 7/12/16; 12/13/16; 3/8/16).	Complete (✓)
B.7.1	Public Participation & Involvement	Other Public Involvement	Sponsor one campus cleanup event annually.	Sponsor one campus cleanup event annually.	Sponsored Boneyard Creek Community Day (April 13, 2016) cleanup event and assisted with iHelp (September 24, 2016) cleanup event.	Exceeded Goals (+)

### Attachment A - Permit Cycle 3, Year 1 Storm Water Activity Report

BMP ID	BMP Category	BMP Subcategory	BMP Description	Year 1 Goal Milestone	Year 1 Activities	Year 1 Status
C.1.1	Illicit Discharge Detection and Elimination	Sewer Map Preparation	Update GIS Storm Sewer System Map as changes occur.	Update GIS Storm Sewer System Map as changes occur.	The University has a GIS system map and is in the process of validating it and adding additional functionality by including trace analysis. Further, the University is incorporating the Illicit Discharge Detection and Elimination Plan findings with this effort.	Complete (✓)
C.2.1	Illicit Discharge Detection and Elimination	Regulatory Control Program	Prohibit illegal discharges to storm sewer system	Prohibition in Campus Administrative Manual.	Discharge to storm sewers is restricted in the Campus Administrative Manual at V-b-3.1: Liquid Waste Disposal.	Complete (✓)
C.3.1	Illicit Discharge Detection and Elimination	Detection/Elimination Prioritization Plan	Investigate priority areas likely to have illicit discharges.	Investigate campus building drains. Develop dye test and drain labelling and/or repair list.	As part of the Illicit Discharge Detection and Elimination Plan, 235 interior drains in 11 buildings were reviewed. Eleven (11) of those drains were dye tested and 44 were identified to be dye tested as funding and resources become available.	Complete (✓)
C.3.2	Illicit Discharge Detection and Elimination	Detection/Elimination Prioritization Plan	Maintain septic system inventory and management program.	Update inventory and plan as changes occur.	The septic tank inventory was reviewed and no updates were required.	Complete (✓)
C.6.1	Illicit Discharge Detection and Elimination	Program Evaluation and Assessment	Develop annual report to Urbana-Champaign Sanitary District documenting illicit connections repaired.	Complete one annual report.	The University completed its 2016 Sanitary Sewer Annual Report and submitted it to UCSD.	Complete (✓)
C.7.1	Illicit Discharge Detection and Elimination	Visual Dry Weather Screening	Visual inspection of outfalls during dry weather.	Inspect storm outfalls along Boneyard Creek, where accessible, once per year during dry weather periods.	Storm sewer outfalls were inspected along the accessible areas of Boneyard Creek on Campus.	Complete (✓)
C.10.2	Illicit Discharge Detection and Elimination	Other Illicit Discharge Controls	Maintain construction standard requiring new storm sewer inlets to have storm water protection warning.	Include standard in bid documents.	The University Facility Standards for Storm Water Drainage Systems and Storm Sewerage Sections requires that all storm grates and curb inlets include a message similar to "Dump No Waste - Drains to River." The associated Standard Drawing includes the same message.	Complete (✓)

### Attachment A - Permit Cycle 3, Year 1 Storm Water Activity Report

BMP ID	BMP Category	BMP Subcategory	BMP Description	Year 1 Goal Milestone	Year 1 Activities	Year 1 Status
C.10.3	Illicit Discharge Detection and Elimination	Other Illicit Discharge Controls	Publicize and encourage spill reporting procedures	Maintain spill response link and posters.	Environmental Compliance provided spill response and reporting training to all maintenance foreman via monthly toolbox talk. The University Spill Response information posters are located in F&S buildings and in a building next to Boneyard Creek. University spill response procedures are also on the Facility and Services, Safety and Compliance website. These provide guidance on what to look for and whom to contact.	Complete (✓)
D.2.1	Construction Site Runoff Control	Erosion and Sediment Control BMP's	Pre-construction briefings for sites > 1 acre	Brief contractor and consultant before each applicable project.	The University attended and spoke at all pre-construction and/or pre-bid meetings for construction projects that require a SWPPP or communicated requirements via phone or email.	Complete (✓)
D.2.3	Construction Site Runoff Control	Erosion and Sediment Control BMP's	Organize Stormwater Management Team (SWMT) to monitor compliance at construction sites	Meet annually to review project compliance.	Environmental Compliance met throughout the year with University Inspectors to discuss construction site runoff control (SWPPP review process, inspections, violations, training).	Complete (✓)
D.2.4	Construction Site Runoff Control	Erosion and Sediment Control BMP's	A/E must prepare SWPPP for project disturbing one acre or more	Maintain Facility Standard and continue to require A/E to prepare SWPPP.	The University requires the A/E's to prepare SWPPPs.	Complete (✓)
D.4.1	Construction Site Runoff Control	Site Plan Review Procedures	Review SWPPPs and Erosion Control Plans	Review at least 75% of SWPPPs for projects > 1 acre	The University reviewed SWPPPs for 100% of projects that disturb one acre or more.	Complete (✓)
D.5.1	Construction Site Runoff Control	Public Information Handling Procedures	Prepare construction site spill or illegal discharge reporting procedures and provide link at University homepage.	Maintain availability of procedures at web link.	The University spill reporting procedures link was moved to the Facilities & Services homepage and made more conspicuous on the Safety and Compliance website.	Complete (✓)

### Attachment A - Permit Cycle 3, Year 1 Storm Water Activity Report

BMP ID	BMP Category	BMP Subcategory	BMP Description	Year 1 Goal Milestone	Year 1 Activities	Year 1 Status
D.6.1	Construction Site Runoff Control	Site Inspection & Enforcement Procedures	Enforce contractor requirements associated with NPDES ILR10 permit, SWPPP, and Facility Standards.	1) Issue contract for each applicable project that explicitly states requirements and enforcement procedures; 2) Enforce compliance according to Erosion and Sedimentation Control Enforcement Program	Contracts were issued for all projects that required SWPPPs and compliance with NPDES General Permit ILR10. The University has a Construction Site Enforcement Program and the procedures are incorporated into University Facility Standards.	Complete (✓)
D.6.2	Construction Site Runoff Control	Site Inspection & Enforcement Procedures	Conduct construction site inspections.	1) Contractor inspect weekly and after 0.5 in rain 2) University inspect monthly	Contractor inspections are on-going. University inspectors are completing monthly inspections.	Complete (✓)
D.6.3	Construction Site Runoff Control	Site Inspection & Enforcement Procedures	Develop and implement procedures for handling reports of non-compliance	Implement Erosion and Sedimentation Control Enforcement Program. Retain Notice of Non-compliance.	The University incorporated the Construction Site Enforcement Program and Progressive Enforcement Remedies into contract documents and Facility Standards.	Complete (✓)
E.2.1	Post-Construction Runoff Control	Regulatory Control Program	Update storm water management policies as needed (i.e. Facility Standards, Campus Administrative Manual, Illinois Climate Action Plan).	Review stormwater management policies and make recommendations for improvement.	Reviewed and maintained all applicable storm water management policies.	Complete (✓)
E.3.1	Post-Construction Runoff Control	Long Term O&M Procedures	Evaluate feasibility of green infrastructure and low impact design for new or redeveloped properties taking into account climate change.	Evaluate campus projects for green infrastructure and low impact design strategies. Continued updates and improvements with campus climate change and sustainability initiatives.	Multiple groups on campus continue to evaluate feasibility of green infrastructure and low impact design strategies on campus including the Student Sustainability Committee, the Water and Stormwater Sustainability Working Advisory Team (SWATeam), the Illinois Climate Action Plan, and the Capital Programs Construction review process.	Complete (✓)

**Attachment A - Permit Cycle 3, Year 1 Storm Water Activity Report**

BMP ID	BMP Category	BMP Subcategory	BMP Description	Year 1 Goal Milestone	Year 1 Activities	Year 1 Status
E.4.1	Post-Construction Runoff Control	Pre-Construction Review of BMP Designs	Plant preservation walkthrough during pre-construction site inspections.	Conduct walk-through for each development and redevelopment.	The Campus Horticulturalist reviews project documents and performs walkthroughs and feed back on long term operation and maintenance of proposed development.	Complete (✓)
E.6.1	Post-Construction Runoff Control	Post-Construction Inspections	Inspect and maintain retention basins.	Inspect basins annually.	The University inspected campus retention basins annually and completed a checklist for each visit.	Complete (✓)
E.7.1	Post-Construction Runoff Control	Other Post-Construction Runoff Controls	Incorporate low impact design elements where applicable into Utility Program Statements in the project review process.	Incorporate low impact design elements where applicable into Utility Program Statements in the project review process.	This was done for 100% of applicable projects.	Complete (✓)
F.1.1	Pollution Prevention/Good Housekeeping	Employee Training Program	Abbott Power Plant Facility Response Plan	Implement plan. Conduct training exercises.	The University has a Facility Response Plan for Abbott Power Plant. The university conducted the FRP exercise on 10/27/16 which included the following entities: F&S Service Office F&S Spill Management Team F&S Environmental Compliance F&S Labor Shop F&S Steam Distribution Staff F&S Abbott Power Plant Staff U of I Public Safety Champaign Fire Department Urbana Fire Department Illinois Environmental Protection Agency	Complete (✓)
F.1.2	Pollution Prevention/Good Housekeeping	Employee Training Program	Implement SPCC Plan	Implement and update SPCC Plan. Conduct annual training.	In 2016, the University SPCC Coordinator held training sessions for Unit Coordinators/Discharge Prevention Managers. The SPCC Coordinator, in turn, trained their oil handling employees. The University tracks oil storage containers on campus as required by 40 CFR 112 SPCC regulations.	Complete (✓)
F.1.3	Pollution Prevention/Good Housekeeping	Employee Training Program	Laboratory and Hazardous Material Training	Make training sessions available.	Chemical management training numbers for 2016 are as follows: General Laboratory Safety Training = 4,759 Chemical Management for Laboratories = 1,324 Hazard Communication Training = 183 MATSE Training = 320	Complete (✓)

## Attachment A - Permit Cycle 3, Year 1 Storm Water Activity Report

BMP ID	BMP Category	BMP Subcategory	BMP Description	Year 1 Goal Milestone	Year 1 Activities	Year 1 Status
F.1.4	Pollution Prevention/Good Housekeeping	Employee Training Program	Pesticide Application Training	Annually review licensing. Provide annual training for all employees who apply pesticides.	The University Grounds crews follow Illinois Department of Agriculture Pesticide Applicator Training Manual Standards and Commercial Landscape and Turfgrass Pest Management Handbook guidelines when applying pesticides. The University annually provides pesticide application training to the Grounds Department employees. The employees who apply pesticides are licensed.	Complete (✓)
F.1.5	Pollution Prevention/Good Housekeeping	Employee Training Program	Annual employee training to prevent and reduce storm water pollution.	Provide annual training to affected MS4 employees.	Annual training was provided to the following groups: Project Managers Project Coordinators Project Planners Operation & Maintenance New Employee Orientation	Complete (✓)
F.2.1	Pollution Prevention/Good Housekeeping	Inspection and Maintenance Program	Maintenance and repair programs for campus car, truck and heavy equipment pools.	Document procedures.	The University has a written Vehicle Maintenance Program and conducts annual employee training and inspections of all car and heavy equipment pool vehicles. The inspection items include checking for oil and other fluid leaks. The University uses a checklist to document these inspections.	Complete (✓)
F.3.1	Pollution Prevention/Good Housekeeping	Municipal Operations Stormwater Control	Storm sewer system and catch basin inspection and cleaning program.	Inspect and clean system as necessary.	The University has a written Storm Sewer Maintenance Program. This Program consisted of cleaning the storm sewers where complaints have been made as well as periodic repairs and maintenance. There were 25 storm sewer system repair and preventative maintenance Work Orders completed. These consisted of numerous storm sewer inlet repairs, cleaning clogged sewers, and the repair of campus storm sewers.	Complete (✓)
F.3.2	Pollution Prevention/Good Housekeeping	Municipal Operations Stormwater Control	Sanitary sewer system and catch basin inspection and cleaning program.	Inspect and clean system as necessary.	The University has a written Sanitary Sewer Maintenance Program. There were 28 sanitary sewer system repair Work Orders and 244 sanitary sewer system preventative maintenance Work Orders completed. These consisted of cleaning sanitary sewers, daily inspection of campus lift stations and pumps, monthly emergency generator inspections, and routine pump maintenance.	Complete (✓)

### Attachment A - Permit Cycle 3, Year 1 Storm Water Activity Report

BMP ID	BMP Category	BMP Subcategory	BMP Description	Year 1 Goal Milestone	Year 1 Activities	Year 1 Status
F.4.1	Pollution Prevention/Good Housekeeping	Municipal Operations Waste Disposal	Hazardous waste management and pickup program.	Maintain and continue program. Record volume of waste picked up each year.	The University provides free hazardous waste pickup and disposal for all campus units. This year, the University picked up approximately 276,089 pounds of hazardous waste.	Complete (✓)
F.4.2	Pollution Prevention/Good Housekeeping	Municipal Operations Waste Disposal	Provide recycling service at the Waste Transfer and Material Recovery Facility. Contain waste materials under cover to avoid contact with storm water.	Provide recycling service to main campus. Contain waste materials under cover at all times.	The University has recycling available in over 225 campus buildings. As such, nearly 95% of the campus population has recycling available to them. Wash downs go to the sanitary system at the Waste Transfer Station. By the end of each working day, the University compacts all putrescible wastes into enclosed semi trailers. Other wastes that need to be covered or enclosed such as lead acid batteries are done so daily.	Complete (✓)
F.6.1	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Direct vehicle washing to sanitary sewer	Clean vehicles only at designated wash facility. Check and cleanout triple basin twice each year.	All vehicle washing took place in designated wash facilities. The University inspected and cleaned out the triple basin quarterly.	Exceeded Goals (+)
F.6.2	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Pesticide Use Policy	Explore opportunities to develop an Integrated Pest Management policy. Record pesticide amounts applied. Operate Rinsate Facility in compliance with Illinois Department of Agriculture permit requirements.	The University drafted a Pesticide Use Policy which is in que to be added to the Campus Administrative Manual. Facilities and Services Grounds Department applied 2,392 pounds and 191 gallons of herbicide, 200 pounds of insecticide, and no fungicide. The University operated the Pesticide Rinsate Facilities for F&S Grounds and Division of Intercollegiate Athletics in accordance with the Illinois Department of Agriculture Lawncare Containment.	Complete (✓)
F.6.3	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Street sweeping	Sweep campus streets at least monthly between April and October.	University street sweeping occurs through agreement with the Cities of Champaign and Urbana. They provide removal of trash, sediment and leaves from University Streets on a monthly basis. Both cities provided monthly street sweeping services for University streets this reporting cycle.	Complete (✓)
F.6.4	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Parking deck cleaning	Sweep parking decks weekly and clean annually. Clean out triple basin when 1/3 full of sediment.	The University swept and cleaned the parking decks three times each week. Annually, the University checks the water and sediment levels.	Exceeded Goals (+)

**Attachment A - Permit Cycle 3, Year 1 Storm Water Activity Report**

BMP ID	BMP Category	BMP Subcategory	BMP Description	Year 1 Goal Milestone	Year 1 Activities	Year 1 Status
F.6.5	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Emergency response contractor continuing purchase order	Ensure that contractor is available 24 hours to assist with spill response.	The University maintained a valid contract with Bodine Environmental and Clean Harbors Environmental Services for emergency response services. Both companies are available 24 hours to assist with spill response.	Complete (✓)
F.6.6	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Salt/Sand Use Management Plan	Ensure proper storage and implement annual training program for Facility and Services employees responsible for applying salt/de-icing materials. Explore options to expand upon salt/sand use policy to develop a salt/sand use management plan.	Salt application operators undergo annual refresher training prior to the deicing season. Salt storage is located inside of structures to minimize storm water pollutant runoff. Salt application is controlled by automated systems located in two of the four University salt application vehicles. This system is programmed by the supervisor and limits controls by the operator. A toolbox talk has been developed for Facilities and Services staff that perform de-icing activities.	Complete (✓)
F.6.7	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Contractor training to prevent and reduce storm water pollution.	Maintain Environmental Compliance line item on all pre-construction meeting agendas, maintain LEED building requirements and attend pre-construction meetings for projects requiring a SWPPP.	Environmental Compliance remains on the pre-construction meeting agendas and when requested briefs contractors on green infrastructure and low impact design techniques, spill reporting and water pollution topics at pre-construction meetings. These items are also communicated to the project through the use of the Environmental Checklist during the design phase of the project. Maintain LEED building requirements in Facility Standards.	Complete (✓)

# **Attachment B**

## Permit Cycle 3, Year 2 Proposed NPDES Storm Water BMPs

## Attachment B - Permit Cycle 3, Year 2 Proposed NPDES Storm Water BMPs

BMP ID	BMP Category	BMP Subcategory	BMP Description	Year 2 Goal Milestone
A.1.1	Public Education and Outreach	Distribute Paper Material	Stormwater fact sheet and posters on Safety & Compliance Website	Post materials.
A.1.2	Public Education and Outreach	Distribute Paper Material	Press Release	Publish one press release.
A.1.3	Public Education and Outreach	Distribute Paper Material	Stormwater Website	Continue updating website.
A.2.2	Public Education and Outreach	Speaking Engagement	Information presentation or information booth.	Make one presentation or staff one booth.
A.3.1	Public Education and Outreach	Public Service Announcement	Social media, radio, television and internet announcements	Broadcast or publish one PSA.
A.4.1	Public Education and Outreach	Community Event	Biennial Green Infrastructure Conference	Plan conference for 2019 and collaborate with other local conferences to hold events on alternating years.
B.1.1	Public Participation & Involvement	Public Panel	Participation by the campus community and students in campus storm water initiatives (i.e. Illinois Climate Action Plan, Sustainable Working Advisory Teams, Student Sustainability Committee)	Continue to involve the campus community and students in the various storm water initiative groups on campus.
B.3.1	Public Participation & Involvement	Stakeholder Meeting	Meet with stakeholder group	Meet once.
B.4.1	Public Participation & Involvement	Public Hearing	Provide opportunity for public input on the Storm Water Program including discussion of IJ areas within MS4 jurisdiction.	Conduct annual public meeting.
B.6.1	Public Participation & Involvement	Program Involvement	Quarterly MS4 Committee meetings	Meet four times.
B.7.1	Public Participation & Involvement	Other Public Involvement	Sponsor one campus cleanup event annually.	Sponsor one campus cleanup event annually.
C.1.1	Illicit Discharge Detection and Elimination	Sewer Map Preparation	Update GIS Storm Sewer System Map as changes occur.	Update GIS Storm Sewer System Map as changes occur.
C.2.1	Illicit Discharge Detection and Elimination	Regulatory Control Program	Prohibit illegal discharges to storm sewer system	Prohibition in Campus Administrative Manual.
C.3.1	Illicit Discharge Detection and Elimination	Detection/Elimination Prioritization Plan	Investigate priority areas likely to have illicit discharges.	Investigate campus building drains. Develop dye test and drain labelling and/or repair list.
C.3.2	Illicit Discharge Detection and Elimination	Detection/Elimination Prioritization Plan	Maintain septic system inventory and management program.	Update inventory and plan as changes occur.
C.6.1	Illicit Discharge Detection and Elimination	Program Evaluation and Assessment	Develop annual report to Urbana-Champaign Sanitary District documenting illicit connections repaired.	Complete one annual report.

## Attachment B - Permit Cycle 3, Year 2 Proposed NPDES Storm Water BMPs

BMP ID	BMP Category	BMP Subcategory	BMP Description	Year 2 Goal Milestone
C.7.1	Illicit Discharge Detection and Elimination	Visual Dry Weather Screening	Visual inspection of outfalls during dry weather.	Inspect storm outfalls along Boneyard Creek, where accessible, once per year during dry weather periods.
C.10.2	Illicit Discharge Detection and Elimination	Other Illicit Discharge Controls	Maintain construction standard requiring new storm sewer inlets to have storm water protection warning.	Include standard in bid documents.
C.10.3	Illicit Discharge Detection and Elimination	Other Illicit Discharge Controls	Publicize and encourage spill reporting procedures	Maintain spill response link and posters.
D.2.1	Construction Site Runoff Control	Erosion and Sediment Control BMPs	Pre-construction briefings for sites > 1 acre	Brief contractor and consultant before each applicable project.
D.2.3	Construction Site Runoff Control	Erosion and Sediment Control BMPs	Organize Stormwater Management Team (SWMT) to monitor compliance at construction sites	Meet annually to review project compliance.
D.2.4	Construction Site Runoff Control	Erosion and Sediment Control BMPs	A/E must prepare SWPPP for project disturbing one acre or more	Maintain Facility Standard and continue to require A/E to prepare SWPPP.
D.4.1	Construction Site Runoff Control	Site Plan Review Procedures	Review SWPPPs and Erosion Control Plans	Review at least 75% of SWPPPs for projects > 1 acre
D.5.1	Construction Site Runoff Control	Public Information Handling Procedures	Prepare construction site spill or illegal discharge reporting procedures and provide link at University homepage.	Maintain availability of procedures at web link.
D.6.1	Construction Site Runoff Control	Site Inspection & Enforcement Procedures	Enforce contractor requirements associated with NPDES ILR10 permit, SWPPP, and Facility Standards.	1) Issue contract for each applicable project that explicitly states requirements and enforcement procedures; 2) Enforce compliance according to Erosion and Sedimentation Control Enforcement Program
D.6.2	Construction Site Runoff Control	Site Inspection & Enforcement Procedures	Conduct construction site inspections.	1) Contractor inspect weekly and after 0.5 in rain 2) University inspect monthly
D.6.3	Construction Site Runoff Control	Site Inspection & Enforcement Procedures	Develop and implement procedures for handling reports of non-compliance	Implement Erosion and Sedimentation Control Enforcement Program. Retain Notice of Non-compliance.
E.2.1	Post-Construction Runoff Control	Regulatory Control Program	Update storm water management policies as needed (i.e. Facility Standards, Campus Administrative Manual, Illinois Climate Action Plan).	Review stormwater management policies and make recommendations for improvement.

**Attachment B - Permit Cycle 3, Year 2 Proposed NPDES Storm Water BMPs**

<b>BMP ID</b>	<b>BMP Category</b>	<b>BMP Subcategory</b>	<b>BMP Description</b>	<b>Year 2 Goal Milestone</b>
E.3.1	Post-Construction Runoff Control	Long Term O&M Procedures	Evaluate feasibility of green infrastructure and low impact design for new or redeveloped properties taking into account climate change.	Evaluate rain garden or porous pavement possibilities for new or redeveloped lots.
E.4.1	Post-Construction Runoff Control	Pre-Construction Review of BMP Designs	Plant preservation walkthrough during pre-construction site inspections.	Conduct walk-through for each development and redevelopment.
E.6.1	Post-Construction Runoff Control	Post-Construction Inspections	Inspect and maintain retention basins.	Inspect basins annually.
E.7.1	Post-Construction Runoff Control	Other Post-Construction Runoff Controls	Incorporate low impact design elements where applicable into Utility Program Statements in the project review process.	Incorporate Low Impact Development elements where applicable into Utility Program Statements in the project review process.
F.1.1	Pollution Prevention/Good Housekeeping	Employee Training Program	Abbott Power Plant Facility Response Plan	Implement plan. Conduct training exercises.
F.1.2	Pollution Prevention/Good Housekeeping	Employee Training Program	Implement SPCC Plan	Implement and update SPCC Plan. Conduct annual training.
F.1.3	Pollution Prevention/Good Housekeeping	Employee Training Program	Laboratory and Hazardous Material Training	Make training sessions available.
F.1.4	Pollution Prevention/Good Housekeeping	Employee Training Program	Pesticide Application Training	Annually review licensing. Provide annual training for all employees who apply pesticides.
F.1.5	Pollution Prevention/Good Housekeeping	Employee Training Program	Annual employee training to prevent and reduce storm water pollution.	Perform annual training for project managers.
F.2.1	Pollution Prevention/Good Housekeeping	Inspection and Maintenance Program	Maintenance and repair programs for campus car, truck and heavy equipment pools.	Document procedures.
F.3.1	Pollution Prevention/Good Housekeeping	Municipal Operations Stormwater Control	Storm sewer system and catch basin inspection and cleaning program.	Inspect and clean system as necessary.
F.3.2	Pollution Prevention/Good Housekeeping	Municipal Operations Stormwater Control	Sanitary sewer system and catch basin inspection and cleaning program.	Inspect and clean system as necessary.
F.4.1	Pollution Prevention/Good Housekeeping	Municipal Operations Waste Disposal	Hazardous waste management and pickup program.	Maintain and continue program. Record volume of waste picked up each year.

**Attachment B - Permit Cycle 3, Year 2 Proposed NPDES Storm Water BMPs**

BMP ID	BMP Category	BMP Subcategory	BMP Description	Year 2 Goal Milestone
F.4.2	Pollution Prevention/Good Housekeeping	Municipal Operations Waste Disposal	Provide recycling service at the Waste Transfer and Material Recovery Facility. Contain waste materials under cover to avoid contact with storm water.	Provide recycling service to main campus. Contain waste materials under cover at all times.
F.6.1	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Direct vehicle washing to sanitary sewer	Clean vehicles only at designated wash facility. Check and cleanout triple basin twice each year.
F.6.2	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Pesticide Use Policy	Review and make updates as necessary to Pesticide Management Policy. Record pesticide amounts applied. Operate Rinsate Facilities in compliance with Illinois Department of Agriculture permit requirements.
F.6.3	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Street sweeping	Sweep campus streets at least monthly between April and October.
F.6.4	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Parking deck cleaning	Sweep parking decks weekly and clean annually. Clean out triple basin when 1/3 full of sediment.
F.6.5	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Emergency response contractor continuing purchase order	Ensure that contractor is available 24 hours to assist with spill response.
F.6.6	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Salt/Sand Use Management Plan	Verify proper salt/de-icing storage. Implement annual training program for Facility and Services employees responsible for applying salt/de-icing materials. Review salt/sand use policy and update as necessary.
F.6.7	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Contractor training to prevent and reduce storm water pollution.	Maintain Environmental Compliance line item on all pre-construction meeting agendas, maintain LEED building requirements and attend pre-construction meetings for projects requiring a SWPPP.

# **Attachment C**

## Permit Cycle 3, Year 2 Changes To BMPs

## Attachment C: Permit Cycle 3, Year 2 Changes to BMPs

BMP ID	BMP Category	BMP Subcategory	BMP Description	Measurable Goal Milestone	BMP Changes	Justification
C.7.1	Illicit Discharge Detection and Elimination	Visual Dry Weather Screening	Visual inspection of outfalls during dry weather.	Inspect storm outfalls along Boneyard Creek, where accessible, once per year during dry weather periods.	Added new BMP to comply with ILR40 permit requirements.	Compliance with ILR40 permit requirements.