

UNIVERSITY OF ILLINOIS
AT URBANA-CHAMPAIGN

Facilities & Services

Physical Plant Service Building
1501 South Oak Street
Champaign, IL 61820



May 31, 2016

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: 2015-2016 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, 2015 to March 31, 2016. 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 dark ink, appearing to read 'David B. Wilcoxon'. The signature is fluid and cursive.

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, 2015 _____ To March, 2016 _____

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

Printed Name:

5/31/16

Date:

Director, Environmental Compliance

Title:

EMAIL COMPLETED FORM TO: 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

This Agency is authorized to require this information under Section 4 and Title X of the Environmental Protection Act (415 ILCS 5/4, 5/39). Failure to disclose this information may result in: a civil penalty of not to exceed \$50,000 for the violation and an additional civil penalty of not to exceed \$10,000 for each day during which the violation continues (415 ILCS 5/42) and may also prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

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 2015 to March 2016

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 has worked in cooperation with other MS4s in the urbanized area to share costs and common efforts and to develop a regional consistency in BMPs towards fulfilling the requirements of the NPDES Phase II Storm Water Program. The MS4 Technical Committee continue 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 7 of the second ILR40 NPDES permit issued.

PERMIT COMPLIANCE ASSESSMENT:

The University proposed in last year's annual report to implement forty-six (46) BMPs during Year 7 of its second MS4 permit cycle to address the required minimum control measures. The University took an aggressive approach by implementing all but one of the BMPs and exceeding performance goals for five 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.

The University made a significant effort to substantially complete this year's BMPs although the University continues to make reductions in response to the state budget. Despite these obstacles, all but one BMP was implemented. The University did not fully implement the following BMP:

- BMP E.6.1 – Inspect and maintain retention basins

The University does not anticipate full restoration of budgetary funding. For this reason, the BMP not implemented was updated to reflect current staffing and budgetary constraints while still meeting the requirements of the ILR40 NPDES permit.

For details regarding the implementation of the Year 7 BMPs, please refer to **Attachment A - Permit Cycle 2, Year 7 NPDES Storm Water Activity Report**.

MONITORING AND ASSESSMENT PROGRAM:

The University will develop and initiate a monitoring and assessment program pursuant to Part V of the newly issued ILR40 permit. The University is working with the MS4 Technical Committee to identify current monitoring and assessment methods employed within the watershed and whether additional methods need to be implemented. The University will submit a monitoring and assessment program to IEPA by September 1, 2016. The University will identify modifications to existing or proposed BMPs affected or added as part of the monitoring and assessment program in that submittal.

STORM WATER ACTIVITIES FOR YEAR 1 OF THIRD PERMIT CYCLE:

The Year 1 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 1 Proposed NPDES Storm Water BMPs**. Attachment B describes the University's proposed storm water activities for April 1, 2016 to March 31, 2017.

CHANGES TO BMPs:

Please refer to **Attachment C – Permit Cycle 3, Year 1 Changes to Storm Water BMPs**. This table outlines modifications made in response to the new 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 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.

YEAR 7 CONSTRUCTION PROJECTS:

University projects that disturbed one acre or more between April 1, 2015 and March 31, 2016 and their associated completion status are listed below:

- Phoenix Solar Photovoltaic Project - Complete
- DIA Golf Practice Facility - Complete
- Ikenberry Commons Residence Hall 3 – In Process
- State Farm Center – In Process

Attachment A

Permit Cycle 2, Year 7 NPDES Storm Water Activity Report

Attachment A - Permit Cycle 2, Year 7 NPDES Storm Water Activity Report

BMP ID	BMP Category	BMP Subcategory	BMP Description	2015-2016 Measurable Goal Milestone	2015-2016 Activities	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 Daily Illini (campus newspaper) for the Quad Day Edition (8/21/2015). Advertisement for Boneyard Creek Community Day (BCCD) was published in the News Gazzette. MS4 Groups and BCCD were featured in the News Gazzette On the Town section.	Exceeded Goals (⊕)
A.1.3	Public Education and Outreach	Distribute Paper Material	Stormwater Website	Continue updating website.	Maintained a stormwater website. URL is http://fs.illinois.edu/services/safety-and-compliance/about-the-program	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	Radio public service announcement	Public service announcement	Broadcast one PSA.	Facilities and Services posted multiple times on the Facebook page. A 30-second audio PSA is available on the stormwater website. University representative appeared on local television news station to promote local stormwater cleanup event.	Exceeded Goals (⊕)

Attachment A - Permit Cycle 2, Year 7 NPDES Storm Water Activity Report

BMP ID	BMP Category	BMP Subcategory	BMP Description	2015-2016 Measurable Goal Milestone	2015-2016 Activities	Status
A.4.1	Public Education and Outreach	Community Event	Biennial Green Infrastructure Conference	Plan next year's conference	The Illinois Green Infrastructure Conference is slated to take place on September 15, 2016. The MS4 Committee is planning this event and details will be provided in next year's report.	Complete (✓)
B.1.1	Public Participation & Involvement	Public Panel	Create and conduct campus surveys	None	Next survey to be conducted in 2019.	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.6.1	Public Participation & Involvement	Program Coordination	Quarterly MS4 Committee meetings	Meet four times.	The Cooperating MS4s met four times (6/9/15; 9/8/15; 12/8/15; 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 18, 2015) cleanup event and assisted with iHelp September 19, 2015) cleanup event.	Exceeded Goals (+)

Attachment A - Permit Cycle 2, Year 7 NPDES Storm Water Activity Report

BMP ID	BMP Category	BMP Subcategory	BMP Description	2015-2016 Measurable Goal Milestone	2015-2016 Activities	Status
C.1.1	Illicit Discharge Detection and Elimination	Storm 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 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, 205 interior drains were inspected. None of these drains were connected improperly.	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 2015 Sanitary Sewer Annual Report and submitted it to UCSD on February 22, 2016.	Complete (✓)

Attachment A - Permit Cycle 2, Year 7 NPDES Storm Water Activity Report

BMP ID	BMP Category	BMP Subcategory	BMP Description	2015-2016 Measurable Goal Milestone	2015-2016 Activities	Status
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 (✓)
C.10.3	Illicit Discharge Detection and Elimination	Other Illicit Discharge Controls	Publicize and encourage spill reporting procedures	Maintain spill response link and posters.	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 BMPs	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.	Complete (✓)
D.2.2	Construction Site Runoff Control	Erosion and Sediment Control BMPs	Project manager training on soil erosion and sediment control requirements	Perform annual training for project managers.	Annual Project Managers training was conducted on February 22, 2016.	Complete (✓)
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.	Environmental Compliance met throughout the year with University Inspectors to discuss construction site runoff control (SWPPP review process, inspections, violations, training).	Complete (✓)

Attachment A - Permit Cycle 2, Year 7 NPDES Storm Water Activity Report

BMP ID	BMP Category	BMP Subcategory	BMP Description	2015-2016 Measurable Goal Milestone	2015-2016 Activities	Status
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.	The University requires the A/Es 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 (✓)
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 (✓)

Attachment A - Permit Cycle 2, Year 7 NPDES Storm Water Activity Report

BMP ID	BMP Category	BMP Subcategory	BMP Description	2015-2016 Measurable Goal Milestone	2015-2016 Activities	Status
E.2.1	Post-Construction Runoff Control	Regulatory Control Program	Upgrade stormwater management policy	Review stormwater management policy 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 bio-retention areas for new or redeveloped surface parking lots.	Evaluate rain garden or porous pavement possibilities for new or redeveloped lots.	Multiple groups on campus continue to evaluate feasibility of bio-retention areas on campus including the Student Sustainability Committee, the Water and Stormwater Sustainability Working Advisory Team (SWATeam), and the Capital Programs Construction review process.	Complete (✓)
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.	Complete (✓)
E.6.1	Post-Construction Runoff Control	Post-Construction Inspections	Inspect and maintain retention basins.	Inspect basins monthly.	The University's preventative maintenance work orders to inspect campus retention basins is now done annually. A checklist is completed for the inspection of each basin.	Not Complete (-)
E.7.1	Post-Construction Runoff Control	Other Post-Construction Runoff Controls	Incorporate Low Impact Development 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.	This was done for 100% of applicable projects.	Complete (✓)

Attachment A - Permit Cycle 2, Year 7 NPDES Storm Water Activity Report

BMP ID	BMP Category	BMP Subcategory	BMP Description	2015-2016 Measurable Goal Milestone	2015-2016 Activities	Status
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 11/16/15 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 2015, the University SPCC Coordinator held 4 training sessions for Unit Coordinators/Discharge Prevention Managers. The SPCC Coordinators, in turn, trained their oil handling employees. The University tracks oil storage containers on campus as required by 40 CFR 112 SPCC regulations.	Complete (✓)

Attachment A - Permit Cycle 2, Year 7 NPDES Storm Water Activity Report

BMP ID	BMP Category	BMP Subcategory	BMP Description	2015-2016 Measurable Goal Milestone	2015-2016 Activities	Status
F.1.3	Pollution Prevention/Good Housekeeping	Employee Training Program	Laboratory and Hazardous Material Training	Make training sessions available.	Chemical management training numbers are as follows: UIUC Chemical Waste Requirements Training = 944 General Laboratory Safety Training = 4,608 Chemical Management for Laboratories = 1,271 Hazard Communication Training = 600 MATSE = 600	Complete (✓)
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.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 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 (✓)

Attachment A - Permit Cycle 2, Year 7 NPDES Storm Water Activity Report

BMP ID	BMP Category	BMP Subcategory	BMP Description	2015-2016 Measurable Goal Milestone	2015-2016 Activities	Status
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. There were 39 total 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 42 sanitary sewer system repair Work Orders and 275 sanitary sewer system preventative maintenance Work Orders completed. These consisted of cleaning the sanitary sewers at the Illini Union, Orchard Downs, Freer Gym, McKinley Health Center, two residence halls, Memorial Stadium, and at two houses. Campus lifts stations and pumps were inspected daily, emergency generators were inspected monthly, and routine pump maintenance was performed.	Complete (✓)
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 246,000 pounds of hazardous waste.	Complete (✓)

Attachment A - Permit Cycle 2, Year 7 NPDES Storm Water Activity Report

BMP ID	BMP Category	BMP Subcategory	BMP Description	2015-2016 Measurable Goal Milestone	2015-2016 Activities	Status
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	Record pesticide amounts applied. Operate Rinsate Facility in compliance with Illinois Department of Agriculture permit requirements.	Grounds applied 165 pounds and 258 gallons of herbicide, 900 pounds of insecticide, and no fungicide. The University operated the Ground Pesticide Rinsate Facility in accordance with the Illinois Department of Agriculture Lawncare Containment.	Complete (✓)

Attachment A - Permit Cycle 2, Year 7 NPDES Storm Water Activity Report

BMP ID	BMP Category	BMP Subcategory	BMP Description	2015-2016 Measurable Goal Milestone	2015-2016 Activities	Status
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 weekly. Annually, the University checks the water and sediment levels in the triple basins.	Complete (✓)
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 Policy.	Develop Salt/Sand Use Policy. Record amounts applied and describe current practices.	638 Tons of salt were applied to campus streets and parking lots for deicing purposes. A Salt/Sand Use Policy was implemented and incorporated into the Campus Administrative Manual.	Complete (✓)

Attachment B

Permit Cycle 3, Year 1 Proposed NPDES Storm Water BMPs

Attachment B - Permit Cycle 3, Year 1 Proposed NPDES Storm Water BMPs

BMP ID	BMP Category	BMP Subcategory	BMP Description	Year 1 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	Carry out conference
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 EJ areas within MS4 jurisdiction.	Conduct annual public meeting. Review and evaluate potential EJ areas using EPA's EJ Screen tool.
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.

Attachment B - Permit Cycle 3, Year 1 Proposed NPDES Storm Water BMPs

BMP ID	BMP Category	BMP Subcategory	BMP Description	Year 1 Goal Milestone
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.
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 (SWM1) 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 1 Proposed NPDES Storm Water BMPs

BMP ID	BMP Category	BMP Subcategory	BMP Description	Year 1 Goal Milestone
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.
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 design 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.	Provide annual training to affected MS4 employees.
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.

Attachment B - Permit Cycle 3, Year 1 Proposed NPDES Storm Water BMPs

BMP ID	BMP Category	BMP Subcategory	BMP Description	Year 1 Goal Milestone
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.
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	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.
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	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.
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 1 Changes To BMPs

Attachment C: Permit Cycle 3, Year 1 Changes to BMPs

BMP ID	BMP Category	BMP Subcategory	BMP Description	Measurable Goal Milestone	BMP Changes	Justification
A.3.1	Public Education and Outreach	Public Service Announcement	Social media, radio, television and internet announcements	Broadcast or publish one PSA.	Reword BMP to include additional forms of PSAs.	PSAs have evolved to include more than just radio. Including multiple avenues for PSAs allows for a greater potential audience.
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.	Removed the campus surveys every five years and replaced with existing groups on campus that solicit participation and feedback regarding the Storm Water Management Program.	The same efforts were being duplicated every five years. Existing groups and participation in regular meetings and campus initiatives serve the same purpose as the 5 year survey.
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.	Updated BMP to comply with new ILR40 permit requirements regarding public meetings and environmental justice areas.	Compliance with new ILR40 permit requirements.
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.	Reword BMP to account for the multiple storm water policies. Changed "upgrade" to "update".	There are multiple storm water management policies for the campus. This change allows for multiple policies to be referenced.

Attachment C: Permit Cycle 3, Year 1 Changes to BMPs

BMP ID	BMP Category	BMP Subcategory	BMP Description	Measurable Goal Milestone	BMP Changes	Justification
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. Continue efforts with iCAP and improvements with campus climate change and sustainability initiatives.	Expanded BMP to include a wider array of green infrastructure and low impact design strategies.	Compliance with new ILR40 permit requirements.
E.6.1	Post-Construction Runoff Control	Post-Construction Inspections	Inspect and maintain retention basins.	Inspect basins annually.	Changed basin inspections from monthly to annually.	Based on findings from previous inspections and reductions in the State budget, it is no longer necessary, or feasible, to inspect basins on a monthly routine.
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.	Expanded training to incorporate wider audience and topics for affected MS4 employees to comply with new ILR40 permit requirements. Moved from Construction Site Runoff Control BMP category to Pollution Prevention/Good Housekeeping.	Compliance with new ILR40 permit requirements.

Attachment C: Permit Cycle 3, Year 1 Changes to BMPs

BMP ID	BMP Category	BMP Subcategory	BMP Description	Measurable Goal Milestone	BMP Changes	Justification
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.	Added language to explore opportunities for the development of an Integrated Pest Management Policy for campus. As time and staffing allow, this policy will be explored.	Developing an integrated pest management policy will provide a more efficient, effective and safer resolution to pest management on campus.
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.	Added language to immediately comply with newly issued ILR40 permit requirements (storage and training) and explore options to formalize a salt/sand use management plan in future years.	Updated BMP to comply with newly issued ILR40 permit requirements.
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.	Updated BMP to comply with new ILR40 permit requirements regarding contractor training.	Compliance with new ILR40 permit requirements.