



SAFETY AND COMPLIANCE
Physical Plant Service Building
1501 South Oak Street – MC 800
Champaign, IL 61820

May 4, 2020

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: 2019-2020 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

Dear Sir or Madam:

Enclosed is the Annual Facility Inspection Report required by the University of Illinois at Urbana-Champaign MS4 NPDES permit. This report covers the period from April 1, 2019 to March 31, 2020.

If you have any questions regarding the information contained in this report, please contact Ms. Betsy Liggett at (217) 265-0915.

Sincerely,

A handwritten signature in blue ink that reads 'David B. Wilcoxon'.

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, 2019 To March, 2020

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 type="checkbox"/> | 4. Construction Site Runoff Control | <input type="checkbox"/> |
| 2. Public Participation/Involvement | <input 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 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:

5/4/2020

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 2019 to March 2020

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 Committee continues to meet at a minimum quarterly and includes the University, City of Champaign, City of Urbana, Village of Savoy and Champaign County. The committee changed its name to the Champaign County Stormwater Partnership (CCSWP) in 2017.

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 Year 4 report for the ILR400523 NPDES permit issued on February 10, 2016.

CURRENT YEAR PERMIT COMPLIANCE ASSESSMENT – Year 4 of 3rd Permit Cycle:

The University proposed in last year's annual report to implement forty-nine (49) BMPs during Year 4 of the third MS4 permit cycle to address the required minimum control measures. **The University successfully implemented and completed 47 of the 49 BMPs. The remaining 2 were partial complete due to the COVID-19 pandemic and the Illinois shelter-in-place Executive Order.** The two partial complete BMPs were: B.4.1 public hearing and C.7.1 creek cleanup after the completed visual dry weather screenings. **The University exceeded performance goals for ten of the individual BMPs and exceeded its BMP performance goals in four of the six required control measures:** Public Education and Outreach, Public Participation and Involvement, Construction Site Runoff Control, and Pollution Prevention and Good Housekeeping.

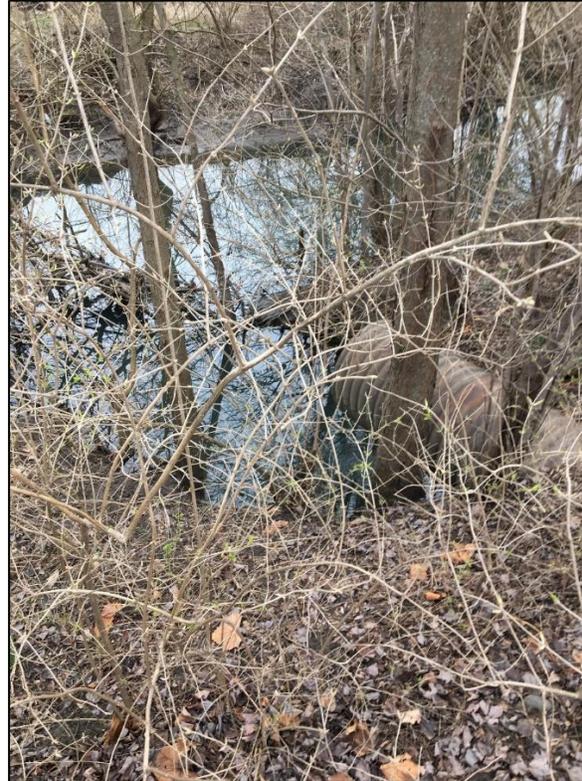
For details regarding the implementation of this past year's BMPs, please refer to **Attachment A - Permit Cycle 3, Year 4 NPDES Storm Water Activity Report.**

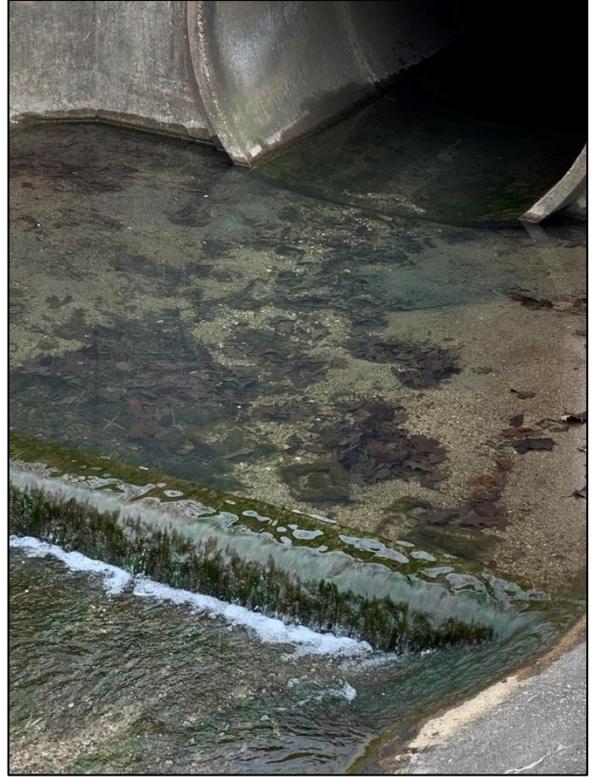
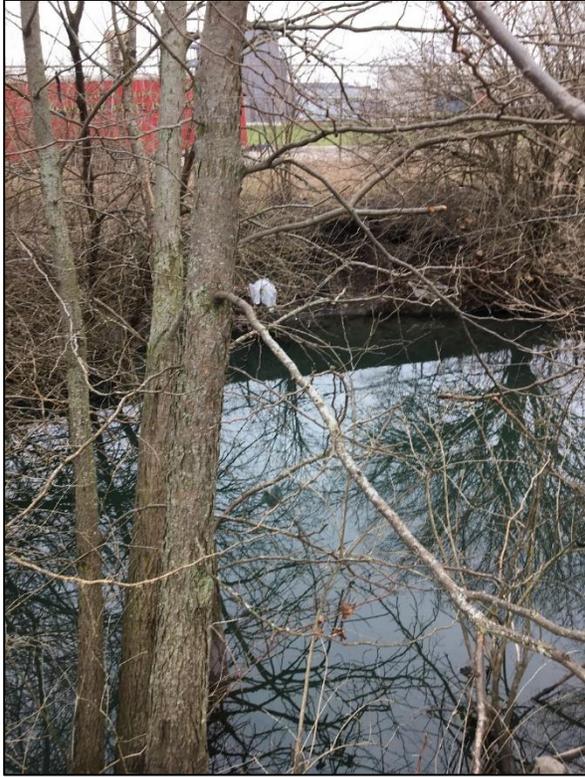
MONITORING AND ASSESSMENT PROGRAM:

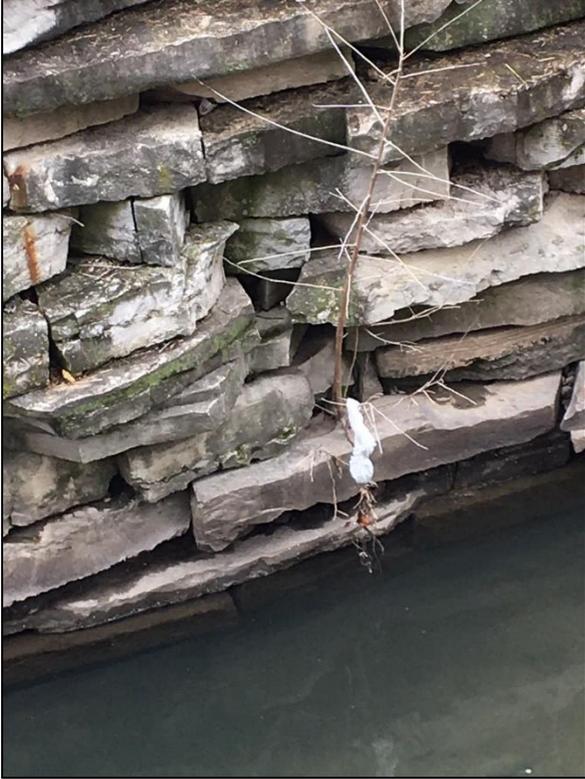
As stated in the Monitoring and Assessment Program Update letter prepared by the University and submitted to the IEPA on August 30, 2016, the University complied with the monitoring and assessment program requirements by implementing an annual assessment of physical/habitat characteristics of the Boneyard Creek stream bank erosion caused by stormwater discharges. The University also extended the creek inspections to the Embarras Tributary north of Windsor and east of Neil Street, near the Fire Service Institute.

Accordingly, the University collaborated with the University of Illinois Facilities & Services Maintenance Department to implement an annual assessment of the physical/habitat characteristics of the stream in accessible areas of the campus Boneyard Creek and the Embarras Tributary. The University performed the Embarras Tributary inspection on 3/23/20 and the Boneyard Creek inspection on 3/25/20. Minor litter and soil bank erosion were found and a clean-up will be scheduled after the COVID-19 Illinois shelter-in-place Executive Order is lifted.

See inspection information below and **Attachment A - Permit Cycle 3, Year 4 NPDES Storm Water Activity Report BMP C.7.1.**









STORM WATER ACTIVITIES FOR NEXT YEAR – Year 5 of 3rd Permit Cycle:

The 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 5 Proposed NPDES Storm Water BMPs**. Attachment B describes the University's proposed storm water activities for April 1, 2020 to March 31, 2021.

CHANGES TO BMPs:

Please refer to **Attachment C – Permit Cycle 3, Year 4 Changes to Storm Water BMPs**. This table outlines modifications made in response to University practices. This year a change was made to BMP E.4.1 Pre-Construction Review of BMP Designs to Accomplish Plant Preservation. Along with pre-construction site walkthroughs, GIS evaluation has also been added as a review option due to staff shortage. Ideally the Campus Horticulturalist and Landscape Architect will visit each site to determine what plants and trees should be preserved, but at times GIS reviews must be completed.

OTHER GOVERNMENTAL ENTITY RELIANCE:

The University continues to participate in and share resources with the Champaign County Stormwater Partnership. The University works in cooperation with other local MS4s to share costs and common efforts to develop consistent BMPs. The MS4 Committee continues to meet at a minimum quarterly and this partnership includes: the University, City of Champaign, City of Urbana, Village of Savoy and Champaign County. The Cities of Urbana and Champaign also have a written agreement with the University to provide street sweeping services to University streets.

Along with the University of Illinois, the City of Urbana and the City of Champaign conduct annual physical/habitat characteristic inspections of stream bank erosion in accessible areas of the Boneyard Creek and the Embarras Tributary. The Cities report any campus related findings to the University.

The Champaign County Stormwater Partnership also collaborates on the spring Boneyard Creek Community Day and fall iHelp clean-up days, and the biennial Green Infrastructure and Erosion Control Conference. These events successfully clean-up the community and provide public education, outreach and involvement.

PERMIT CYCLE 3, YEAR 4 CONSTRUCTION PROJECTS:

University projects that disturbed one acre or more between April 1, 2019 and March 31, 2020 and their associated completion status are listed below:

- Campus Instructional Facility – Active
- CERL Robotics Lab – Initiated and Active
- DIA Soccer Track Complex BP1 – Active
- DIA Soccer Track Complex BP2 – Initiated and Active
- DIA Track and Field Replacement – Initiated and Active
- Feed Technology Center – Initiated and Active
- Hydrosystems Lab Renovation – Active
- Illinois Conference Center Expansion – Initiated and Active
- ISR Dining – Active
- Memorial Stadium Football Performance Center – Active
- RIPE Greenhouse – Initiated and Active
- Siebel Center for Design – Active
- Tennis Courts (Illini Grove and Outdoor Center) – Complete

Attachment A

Permit Cycle 3, Year 4 NPDES Storm Water Activity Report

Attachment A - Permit Cycle 3, Year 4 Stormwater Activity Report

BMP ID	BMP Category	BMP Subcategory	BMP Description	Year 4 Goal Milestone	Year 4 Activities	Year 4 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 News Gazette Boneyard Creek Community Day (BCCD) sponsor ad on 4/28/19. Cancelled press release distribution for BCCD 2020 due to COVID-19.	Complete
A.1.3	Public Education and Outreach	Distribute Paper Material	Stormwater Website	Continue updating website.	Maintained the University stormwater website http://fs.illinois.edu/services/safety-and-compliance/about-the-program including posting information about Climate Change and Environmental Justice on http://www.fs.illinois.edu/services/safety-and-compliance/about-the-program/events-and-outreach . Also maintain the MS4 CCSP website https://www.ccstormwater.org/	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 on 4/13/19, assisted with supplies for the public iHelp community event 9/28/19 and hosted the July 12, 2019 Erosion Control and Green Infrastructure Conference at the I Hotel.	Exceeded Goals
A.3.1	Public Education and Outreach	Public Service Announcement	Social media, radio, television and internet announcements	Broadcast one PSA.	Facilities and Services posted stormwater information multiple times on the Facebook and Twitter regarding the Boneyard Creek Community Day event. There is also a one minute "Stormwater Rap" and a 53-second audio "People of the Boneyard" PSA available on the stormwater website https://www.fs.illinois.edu/services/safety-and-compliance/about-the-program/events-and-outreach .	Exceeded Goals
A.4.1	Public Education and Outreach	Community Event	Biennial Green Infrastructure Conference	Carry out conference	The University and the MS4 committee hosted the 2019 Erosion Control and Green Infrastructure Conference on July 12, 2019 at the I Hotel and Conference Center. Seven speakers discussed topics ranging from ILR10 and ILR40 permits, erosion control research and products, along with green infrastructure practices and community outreach.	Complete

Attachment A - Permit Cycle 3, Year 4 Stormwater Activity Report

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 Land and Water 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.	Meet once.	The University cancelled the public meeting scheduling in March 2020 due to the COVID-19 outbreak. However the permit, stormwater program BMPs and Environmental Justice (EJ) information is posted on our stormwater webpage with staff contact information http://www.fs.illinois.edu/services/safety-and-compliance/about-the-program/events-and-outreach . The University also hosted the free public Erosion Control and Green Infrastructure Conference on July 12, 2019 with information on relevant permits, this seminar included question/answer segments.	Partial Compliance
B.6.1	Public Participation & Involvement	Program Involvement	Quarterly MS4 Committee meetings	Meet four times.	The Cooperating MS4s met six times (3/12/19, 4/30/19, 6/11/19, 9/10/19, 12/10/19, and 3/10/20)	Exceeded Goals
B.7.1	Public Participation & Involvement	Other Public Involvement	Sponsor one campus cleanup event annually.	Sponsor one campus cleanup event annually.	Organized and sponsored Boneyard Creek Community Day (April 13, 2019) cleanup event and sponsored supplies and maps for iHelp September 28, 2019) cleanup event.	Exceeded Goals
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 that they validate and update as needed and new information is acquired. Further, the University is incorporating the Illicit Discharge Detection and Elimination Plan findings with this effort.	Complete

Attachment A - Permit Cycle 3, Year 4 Stormwater Activity Report

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 under Policy Number FO-65 Storm Sewer Usage.	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 labeling and/or repair list.	As part of the Illicit Discharge Detection and Elimination Plan, 42 drains were reviewed in three buildings. Eight of these drains will be dye tested for connection verification this summer when weather warmer. The other 34 drains were properly connected. These include 7 roof drains routed to storm sewer, 4 roof drains connected to downspouts with surface ground discharge, and 23 floor and sink drains routed to sanitary. Of the 23 sanitary connections, 17 of these are floor drains routed to the sanitary sewer system and 6 (5 floor drains and 1 mop sink) are connected to a sanitary septic tank.	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 updated with new systems and facility contacts.	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.	Utilities did not find any illicit connections that required repair or reported to UCSD during the reporting period.	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 and Embarrass tributary, where accessible, once per year during dry weather periods.	Storm sewer outfalls were inspected along the accessible campus areas of the Embarrass tributary on 3-23-20 and the Boneyard Creek on 3-25-20 by Facilities & Services Maintenance personnel. No major issues were found. Creek clean-ups will occur after employees return to work from the state COVID-19 order.	Partial 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 PSC contract bid documents.	The University Facility Standards/General Guidelines/Utilities/Storm Water Drainage Systems requires that all storm grates and curb inlets include a message similar to "Dump No Waste - Drains to River." Facility Standard reference is included in the Professional Services Consultant Agreements.	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 around campus. University spill response procedures are also posted on the Facility and Services, Safety and Compliance website https://www.fs.illinois.edu/services/safety-and-compliance/about-the-program/events-and-outreach which provide guidance on what to look for and whom to contact.	Complete

Attachment A - Permit Cycle 3, Year 4 Stormwater Activity Report

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 attends and speaks at 50% design meetings and/or pre-construction for construction projects that require a SWPPP. Email correspondence and project review also occurs.	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 meets/discusses issues with University Inspectors at pre-construction meetings and as needed throughout the year regarding construction site runoff control (SWPPP review process, inspections, violations, training).	Complete
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/E to prepare SWPPPs as referenced in Facility Standards 31 25 00 Soil Erosion and Sedimentation Control. There are currently 13 active 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. There are currently 13 active SWPPPs.	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 is on the Facilities & Services homepage https://www.fs.illinois.edu/	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	SWPPP contractor inspections are on-going weekly and after 0.5 inch rain. University inspectors complete inspections at least monthly. University inspectors also report potential issues every time they are on construction sites, typically more than once month.	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 PSC bid/contract documents and Facility Standards (01 35 43 Environmental Requirements Site Enforcement). Facility Standard reference is included in the Professional Services Consultant Agreements.	Complete

Attachment A - Permit Cycle 3, Year 4 Stormwater Activity Report

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; CAM FO-65 policy & Facility Standards (General Guidelines/Utilities/Stormwater Drainage Systems, 01 35 43 Environmental Requirements Site Enforcement & 31 25 00 Soil Erosion and Sedimentation Control).	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 rain garden or porous pavement possibilities for new or redeveloped lots.	Multiple groups on campus continue to evaluate feasibility of green infrastructure and low impact design strategies on campus. These include the Student Sustainability Committee, the Land and Water Sustainability Working Advisory SWATeam, the Illinois Climate Action Plan Working Group, and the Capital Programs Construction review process. Per the Facility and Services Standards, all construction projects involving stormwater improvements are required to incorporate green infrastructure and low impact design.	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 and Landscape Architect review project documents, perform walkthroughs and provide suggestions when needed on long term operation and maintenance of proposed development. With staff shortages, if they cannot go to every site they perform online GIS reviews and provide feedback on plant preservation.	Complete
E.6.1	Post-Construction Runoff Control	Post-Construction Inspections	Inspect and maintain retention basins.	Inspect basins annually.	The University visits the campus Dorner Drive Retention basin daily (5 days/week) to inspection for immediate concerns and also performs an annual inspection in which they fill out a checklist. Last checklist date was 3-26-20.	Exceeded Goals
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.	This was done for 100% of applicable projects. Utility Distribution is working with projects to incorporate low impact development elements in projects. Utility Program Statements will incorporate them into design review process.	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 10-15-2019 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, F&S Operators, City Champaign, Bodine Environmental Services, Illinois Environmental Protection Agency and Champaign Fire Department.	Complete

Attachment A - Permit Cycle 3, Year 4 Stormwater Activity Report

F.1.2	Pollution Prevention/Good Housekeeping	Employee Training Program	Implement SPCC Plan	Implement and update SPCC Plan. Conduct annual training.	In 2019, the University SPCC Coordinator held 2 training sessions on 12/3 and 12/12 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. Updated SPCC plans for 2019 include Housing and Newmark.	Complete
F.1.3	Pollution Prevention/Good Housekeeping	Employee Training Program	Laboratory and Hazardous Material Training	Make training sessions available.	Calendar year 2019 chemical management training numbers include: Hazard Communication – 507 Chemical Safety: An Introduction – 1,719 Laboratory Safety Training – 5,533 MATSE – 300	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 Turf grass Pest Management Handbook guidelines when applying pesticides. The University annually attends Dept. of Ag pesticide application training and must pass the exam. Currently 43 out of 47 employees in the Grounds department are licensed. 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.	Perform annual training for project managers.	Annual storm water training was provided to the following groups: Facilities & Services Project Managers 2-3-20, Project Planners 2-4-20 and Project Coordinators 2-11-20	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 fleet pool vehicles. The inspection items include checking for oil and other fluid leaks. The University uses a checklist to document these inspections. In addition to the once year complete inspection, quarterly vehicles also receive oil changes and safety checks.	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 442 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

Attachment A - Permit Cycle 3, Year 4 Stormwater Activity Report

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 487 sanitary sewer system repair Work Orders and 234 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
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. In calendar year 2019: 298,588 pounds of hazardous waste was picked up and properly disposed of.	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. University Facilities & Services has a reoccurring 2 month WO under the Garage and Car Pool asset 49163 (Floor Drains / Shop Drains and Triple Basin) for the Plumbers to rod the drains between the wash bay attached to the garage and the triple basins. The Plumbers also call the vender (currently Bergs) to inspect/clean out the basins. Bergs serviced the triple basins on: 4/8/19, 6/21/19, 11/14/19 and 2/27/20.	Exceeded Goals
F.6.2	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Pesticide Use Policy	Explore options to develop an Integrated Pest Management policy. Record pesticide amounts applied. Operate Rinsate Facility in compliance with Illinois Department of Agriculture permit requirements.	Between April 1, 2019 through March 31, 2020 the Facilities and Services Grounds Department applied 15,370 pounds of granular fertilizer/herbicide combination and 93 gallons of liquid weed control. No insecticide or fungicide was used. The University operated the Pesticide Rinsate Facilities for F&S Grounds in accordance with the Illinois Department of Agriculture Lawncare Containment. The Pesticide Use Policy was combined with the Integrated Pest Management Plan and was completed in 12-18 and is posted on the Facilities & Services website https://www.fs.illinois.edu/services/grounds/integrated-pest-management .	Complete

Attachment A - Permit Cycle 3, Year 4 Stormwater Activity Report

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 for special occasions. Both cities provided 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. Clean out triple basin when 1/3 full of sediment.	The University swept the five parking decks three times each week. These include: C-7, C-10, B-4, F-29 and KCPA. Annually, the University checks the triple basins water and sediment levels. Six locations (13 basins) were checked on 6-3-19 and 6-19-19, none needed cleaned out.	Exceeded Goals
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.	Exceeded Goals
F.6.6	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Salt/Sand Use Management Plan	Identify current salt/de-icing storage locations and ensure proper storage. Implement annual training program for Facility and Services employees responsible for applying salt/de-icing materials. Explore options to develop a salt/sand use management plan.	Salt application operators undergo annual refresher training prior to the deicing season, usually in the month of October. Salt storage is located inside a covered structure/shed at the Physical Plant Services Building to minimize storm water pollutant runoff. Salt application is controlled by automated systems located on two of the four University salt application vehicles. This system is programed by the supervisor and limits controls by the operator. A toolbox talk has been developed and updated 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.	Perform annual training for project managers/contractors.	Annual storm water training was provided to the following groups: Facilities & Services Project Managers 2-3-20, Project Planners 2-4-20 and Project Coordinators 2-11-20. These individuals manage construction projects and contractors. Environmental Compliance also attended pre-construction meetings with contractors to discuss erosion control, spill reporting and SWPPP requirements. These items along with green infrastructure and low impact design techniques, are also communicated to the project AE through the use of the Environmental Checklist and project design meetings. The University also maintains LEED building requirements in the Facility Standards.	Exceeded Goals

Attachment B

Permit Cycle 3, Year 5 Proposed NPDES Storm Water BMPs

Attachment B - Permit Cycle 3, Year 5 Proposed NPDES BMP's

BMP ID	BMP Category	BMP Subcategory	BMP Description	Year 4 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
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.

Attachment B - Permit Cycle 3, Year 5 Proposed NPDES BMP's

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.
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 and Embarrass tributary, 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 PSC contract bid documents.

Attachment B - Permit Cycle 3, Year 5 Proposed NPDES BMP's

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

Attachment B - Permit Cycle 3, Year 5 Proposed NPDES BMP's

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.
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 or GIS review during pre-construction site inspections.	Conduct walk-through or GIS review 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.

Attachment B - Permit Cycle 3, Year 5 Proposed NPDES BMP's

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.
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.

Attachment B - Permit Cycle 3, Year 5 Proposed NPDES BMP's

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. 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.

Attachment B - Permit Cycle 3, Year 5 Proposed NPDES BMP's

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.
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Attachment C

Permit Cycle 3, Year 4 Changes To BMPs

Attachment C - Permit Cycle 3, Year 4 NPDES BMP Changes

BMP ID	BMP Category	BMP Subcategory	BMP Description	Measurable Goal Milestone	BMP Changes	Justification
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.	Plant preservation walkthrough or GIS review during pre-construction site inspection for each development and redevelopment.	Ideally the Campus Horticulturalist and Landscape Architect will visit each site but with staff shortage sometimes GIS reviews must be completed.