



Facilities & Services

Safety & Compliance
Physical Plant Service Building, MC-821
1501 S. Oak St.
Champaign, IL 61820-6905

May 10, 2024

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

2023-2024 Annual Facility Inspection Report
Municipal Separate Storm Sewer Systems (MS4)
National Pollutant Discharge Elimination System (NPDES) Permit No. ILR400523
University of Illinois Urbana-Champaign

Dear Sir or Madam:

Enclosed is the Annual Facility Inspection Report required by the University of Illinois Urbana-Champaign MS4 NPDES permit. This report covers the period from April 1, 2023 to March 31, 2024.

The University proposed to implement forty-nine BMPs during year eight of the third MS4 permit cycle to address the required minimum control measures. The University successfully implemented and completed all 49 BMPs, with one being partial compliance in the Illicit Discharge Detection and Elimination category.

The University exceeded performance goals for eleven individual BMPs and exceeded its BMP performance goals in five of the six required control measure categories: Public Education and Outreach, Public Participation and Involvement, Construction Site Runoff Control, Post Construction Site Runoff Control, and Pollution Prevention and Good Housekeeping.

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

Sincerely,

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

David B. Wilcoxon

Associate Director, Environmental Compliance

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
ANNUAL FACILITY INSPECTION REPORT**

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

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

REPORTING PERIOD:

April 2023 to March 2024

MS4 OPERATOR INFORMATION:

University of Illinois Urbana-Champaign
1501 S. Oak Street
Champaign, Illinois 61820
(217) 333-3655
David Wilcoxon
Associate Director, Environmental Compliance

GOVERNMENTAL ENTITY IN WHICH MS4 IS LOCATED:

University of Illinois 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 five 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) oversees 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 University submitted the third NOI to the IEPA on September 30, 2013. The University received its 2016-2021 ILR40 NPDES permit on February 11, 2016.

This document serves as the Year 8 report for the ILR400523 NPDES permit issued on February 10, 2016. This permit expired on February 28, 2021, however the IEPA has not issued a new five-year general permit therefor the University is operating under it until a new permit is issued. At that time, the University will submit a new NOI as advised.

CURRENT YEAR PERMIT COMPLIANCE ASSESSMENT – Year 8 of 3rd Permit Cycle:

The University proposed in last year's annual report to implement forty-nine (49) BMPs during Year 8 of the third MS4 permit cycle to address the required minimum control measures. The University successfully implemented and completed all 49 BMPs, with one being partial compliance in the Illicit Discharge Detection and Elimination category. The University exceeded performance goals for eleven individual BMPs and exceeded its BMP performance goals in five of the six required control measure categories: Public Education and Outreach, Public Participation and Involvement, Construction Site Runoff Control, Post 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 8 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 Safety and Compliance collaborated with the University 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 preformed the Boneyard Creek and the Embarras Tributary inspections on November 4, 2023. No major issues were found and creek cleanups occurred the same day.

See inspection information below and **Attachment A - Permit Cycle 3, Year 8 NPDES Storm Water Activity Report BMP C.7.1.**

UNIVERSITY OF ILLINOIS - EMBARRAS TRIBUTARY INSPECTION

The University of Illinois Facilities & Services, Maintenance Department visually inspected the Embarras tributary near Windsor and S. First St. on November 4, 2023. No major issues were found and the creek litter cleanup occurred the same day.

I ILLINOIS		
Facilities & Services		
Waterway:	<input type="checkbox"/> Boneyard Creek	<input checked="" type="checkbox"/> Tributary to Embarras
Inspection Section:	Inlet East of Illinois Fire Service Institute to Curtis overpass	
Inspector(s):	Patrick J Wood	Date: 11/4/2023
Reason for Inspection:	<input checked="" type="checkbox"/> Routine	<input type="checkbox"/> Complaint
	YES	NO
Accumulation of debris or trash?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Accumulation of sediment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Brush removal needed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Tree removal needed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Soil erosion on banks or at outfalls?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Presence of holes from animals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Presence of algae or stagnant moisture?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Unpleasant odors?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Evidence of illicit discharge?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Storm outfalls or channel plugged by debris?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Storm outfalls or other structures damaged or absent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Waterway impaired?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments & Corrective Measures Needed: (attach photos)		
Inspection and clean up operations were conducted on November 4th 2023 by a crew of 5 F&S team members. Trash and debris was collected for recycling or disposal.		
All areas were accessible with the use of chest waiters and no significant findings to note.		

1 – Tributary



2 – Tributary



3 – Tributary




4 – Tributary



UNIVERSITY OF ILLINOIS – BONEYARD CREEK INSPECTION

The University of Illinois Facilities & Services, Maintenance Department visually inspected the Boneyard Creek on campus between 6th Street and Gregory on November 4, 2023. No major issues were found and the creek litter cleanup occurred the same day.



Waterway: Boneyard Creek Tributary to Embarras

Inspection Section: Boneyard Creek, Wright St. U. to Gregory St. U.

Inspector(s): Patrick J Wood **Date:** 11/4/2023

Reason for Inspection: Routine Complaint

	YES	NO
Accumulation of debris or trash?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Accumulation of sediment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Brush removal needed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Tree removal needed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Soil erosion on banks or at outfalls?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Presence of holes from animals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Presence of algae or stagnant moisture?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Unpleasant odors?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Evidence of illicit discharge?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Storm outfalls or channel plugged by debris?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Storm outfalls or other structures damaged or absent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Waterway impaired?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments & Corrective Measures Needed: *(attach photos)*

Inspection and clean up operations were conducted on November 4th 2023 by a crew of 5 F&S team members. Trash and debris was collected for recycling or disposal.

All areas were accessible with the use of chest waiters and no significant finding to note.

1 – Boneyard



2 – Boneyard



3 - Boneyard



4 - Boneyard



5 – Boneyard




6 - Boneyard



UNIVERSITY OF ILLINOIS – DORNER DRIVE RETENTION BASIN INSPECTION

In accordance with BMP E.6.1, the University of Illinois Facilities & Services, Water Station inspects the campus Dorner Drive Retention basin annually and completes a checklist. The last annual inspection in which a checklist was completed occurred on April 20, 2023 and no issues were found. The staff also visits daily (5 days/week) to inspect for immediate concerns.



ILLINOIS

Facilities & Services

Basin Inspection: Dorner Drive Retention Pond

Inspector(s): MAFF DALTON **Date:** 04-20-23

Reason for Inspection: Routine Complaint

	YES	NO
Accumulation of debris or trash?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Accumulation of sediment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Brush or tree removal needed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Soil erosion on banks or at outfalls?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Unpleasant odors?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Evidence of illicit discharge?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Presence of algae or stagnant moisture?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Presence of animals that need assistance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Storm outfalls plugged by debris or damaged?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Add screens to overflow?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Pull aerator pumps to clean?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments & Corrective Measures Needed: *(attach photos)*

The University visits the campus Dorner Drive Retention basin daily (5 days/week) to inspect for immediate concerns and also performs an annual inspection in which they fill out a checklist. The last annual documented inspection occurred on 4-20-23.



Basin south end looking north 2020



Basin north end looking south 2020



Basin no-mow zone looking south 4/23



Basin no-mow zone looking north 4/23

STORM WATER ACTIVITIES FOR NEXT YEAR – Year 9 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 9 Proposed NPDES Storm Water BMPs**. Attachment B describes the University's proposed storm water activities for April 1, 2024 to March 31, 2025.

CHANGES TO BMPs:

Please refer to **Attachment C – Permit Cycle 3, Year 8 Changes to Storm Water BMPs**. This table outlines modifications made in response to University practices. No BMP changes were made this reporting year.

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 monthly when there is not snow (typically April-October) and for special events.

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 campus findings to the University.

The Champaign County Stormwater Partnership also collaborates for the spring Boneyard Creek Community Day and fall iHelp litter 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. The annual Boneyard Creek Community Day event occurred on April 22, 2023 with 502 volunteers who cleaned approximately 1,662 acres and the campus fall iHelp Day of Service clean-up occurred on September 30, 2023. The MS4 Champaign County Stormwater Partnership committee also planned and hosted the biennial Illinois Green Infrastructure & Erosion Control Conference on October 24, 2023.

PERMIT CYCLE 3, YEAR 8 CONSTRUCTION PROJECTS:

University projects that disturbed one acre or more between April 1, 2023 and March 31, 2024 and their associated construction and completion statuses:

- CERL EPIC – Active
- Midfield Intersection Reconfiguration (Willard Airport) – Active
- Parking Structure E15 – Complete
- UIUC South Campus Center for Interdisciplinary Learning/SSCIL/Wymer Hall – Active
- UI Foundation Headquarter Building – Active

Attachment A

Permit Cycle 3, Year 8 NPDES Storm Water Activity Report

Attachment A - Permit Cycle 3, Year 8 Storm Water Activity Report

BMP ID	BMP Category	BMP Subcategory	BMP Description	Year Goal 8 Milestone	Year 8 Activities	Year 8 Status
A.1.1	Public Education and Outreach	Distribute Paper Material	Stormwater fact sheet and posters on Safety & Compliance Website	Post materials	Maintained outreach posters on F&S Safety & Compliance website: three 2022 spill response posters, 2 litter posters and a 2023 Solution to Pollution brochure. We also have four training documents posted called Toolbox Talk regarding permits, spills, erosion control and winter de-icing material storage/use https://fs.illinois.edu/stormwater-management/	Compliant
A.1.2	Public Education and Outreach	Distribute Paper Material	Press Release	Publish one press release	The Boneyard Creek Community Day (BCCD) litter pick up event occurred on 4/22/23. The BCCD public website http://www.boneyardcreek.org/ is up to date with litter/volunteer/sponsor tallies. A press release was issued for the 2023 event. Environmental Compliance employees also staffed a stormwater information table at the campus All-Employee Expo on 10/12/23. During this event we discussed and handed out information on the campus MS4 stormwater permit, BMPs, construction erosion control measures, community stormwater litter pick up events, conferences and campus environmental justice review.	Compliant
A.1.3	Public Education and Outreach	Distribute Paper Material	Stormwater Website	Continue updating website	Maintained and updated the University stormwater website https://fs.illinois.edu/stormwater-management/ including posting information about Climate Change, Environmental Justice, stormwater reports/BMPs, and events and educational posters/brochures. Also maintain the MS4 CCSP website https://www.ccstormwater.org/	Compliant
A.2.2	Public Education and Outreach	Speaking Engagement	Information presentation or information booth	Make one presentation or staff one booth	Staffed a table and provided information to volunteers at the Boneyard Creek Community Day (BCCD) litter pick up event on 4/22/23. A table was also staffed by student alumni ambassadors at the annual fall iHelp Day of Service litter clean up event that occurred on 9/30/23. Environmental Compliance also staffed a stormwater information table at the campus All-Employee Expo on 10/12/23. Environmental Compliance also led two campus undergraduate class discussion regarding campus stormwater and green infrastructure: Environmental Issues Today 4/6/23 stormwater prospects that help promote compliance and turn stormwater into an asset, and, Sustainable Planning Workshop 9/1/23 class presentation and a follow up field trip along the Boneyard Creek and Second Street Basin on 9/8/23to discuss City of Champaign and the University of Illinois creek bank and detention improvements.	Exceeded Goals
A.3.1	Public Education and Outreach	Public Service Announcement	Social media, radio, television and internet announcements	Broadcast one PSA	The Boneyard Creek Community Day (BCCD) spring litter clean up event occurred on 4/22/23 and a PSA/press release was distributed for this event. Facilities & Services also posted two PSAs on the campus stormwater website regarding clean streams and carwashes https://fs.illinois.edu/stormwater-management/	Exceeded Goals

Attachment A - Permit Cycle 3, Year 8 Storm Water Activity Report

BMP ID	BMP Category	BMP Subcategory	BMP Description	Year Goal 8 Milestone	Year 8 Activities	Year 8 Status
A.4.1	Public Education and Outreach	Community Event	Biennial Green Infrastructure Conference	Carry out conference	The University and the local MS4 committee, Champaign County Stormwater Partnership, hosted the biennial Green Infrastructure & Erosion Control Conference on 10/24/23 at the Champaign IL iHotel & Conference Center. Presentations included: Artful Rainwater Designs, Green Infrastructure Solutions in Peoria IL, Designing Landscapes to Support Pollinators, and Modeling Green Infrastructure Functionality in the Context of Environmental Justice. The conference also included a tour to see the Crystal Lake Rehabilitation Project https://www.ccstormwater.org	Compliant
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 (ISEE), and the Facilities and Services Sustainability office continue to involve the campus community in campus storm water initiatives. Environmental Compliance is also part of the ISEE Land and Water iCAP Team where we work together to advise and recommend sustainable campus stormwater and land projects.	Compliant
B.3.1	Public Participation & Involvement	Stakeholder Meeting	Meet with stakeholder group	Meet once	A University representative from Facilities and Services, Environmental Compliance is a member of the campus ISEE Land & Water Sustainability Working Advisory iCAP Team. This team focuses on project ideas that conserve potable water, detain site stormwater, use rainwater as an asset, support pollinators and sustainable landuse. The team meets multiple times each year reviewing projects and the campus iCAP goals and also recommends projects to make the campus more sustainable.	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	Environmental Compliance staffed a stormwater information table at the campus All-Employee Expo on 10/12/23. During this event we discussed and handed out information on the campus MS4 stormwater permit, BMPs, construction erosion control measures, community stormwater litter pick up events, conferences and campus environmental justice review. Campus iSEE also held Ted Talks in 2023 regarding climate change, environmental justice, renewable energy and campus waste reduction initiatives. University Professor Mark Taylor from the UI School of Architecture and his students also are available to collaborate with a local sustainable farm called Prosperity Gardens on various environmental justice project, grants and vender material. Prosperity Gardens is a local City Champaign Township organization that helps grow food, employ/educate the homeless, and distribute food to under represented communities.	Exceeded Goals
B.6.1	Public Participation & Involvement	Program Involvement	Quarterly MS4 Committee meetings	Meet four times	The Cooperating MS4, Champaign County Stormwater Partnership, met four times during 2023 (3/14/23, 6/13/23, 9/12/23 and 12/12/23). We additional met on 8/9/23 and on 10/10/23 to finalize MS4 biennial conference items.	Exceeded Goals

Attachment A - Permit Cycle 3, Year 8 Storm Water Activity Report

BMP ID	BMP Category	BMP Subcategory	BMP Description	Year Goal 8 Milestone	Year 8 Activities	Year 8 Status
B.7.1	Public Participation & Involvement	Other Public Involvement	Sponsor one campus cleanup event annually	Sponsor one campus cleanup event annually	The university is an event committee member, co-host and co-sponsor for the annual Boneyard Creek Community Day (BCCD) litter pick up event which occurred on 4/22/23. The BCCD public website http://www.boneyardcreek.org/ is up to date with litter, volunteer, sponsor and organizer tallies. Campus student alumni ambassadors also hosted an annual fall iHelp Day of Service litter clean up event which occurred on 9/30/23.	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 and validates it as needed by adding additional functionality by including trace analysis. The University also incorporates the Illicit Discharge Detection and Elimination Plan findings (when new drains are dye tested the results are shared with the GIS Team for system updates).	Compliant
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. https://cam.illinois.edu/policies/fo-65/	Compliant
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	F&S Maintenance completes building drain plan reviews during winter months and connections that can not be determined on the construction drawings are referred to the F&S Plumbers to research/dye test in the following spring-fall. The Plumbers were not able to dye test the previous year referred locations during the summer 2023, however they are working on these 9 locations this summer/2024. However, in May 2023 the Plumbers dye tested the VetMed Ag Barn. This location and a previously determined Observatory location was found to be improperly connected and rerouted: Observatory Room 20 mechanical space sump pump was connected to storm and rerouted to sanitary, and, the VetMed Ag Barn building 0963 connected to a sediment basin, then a septic tank and then sanitary and was rerouted solely to sanitary. Two other locations that were previously determined to have floor drains connected to storm were also evaluated: Stock Pavilion Arena 120 walkway (installed temporary plugs) and C7 Parking Garage (didn't need corrected). In late 2023, Maintenance researched drawings for 12 Housing buildings, none were found to be improperly connected. Maintenance also put together a new building list for drawing review this winter/2024.	Partial Compliance
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 as needed with new systems and facility contacts.	Compliant

Attachment A - Permit Cycle 3, Year 8 Storm Water Activity Report

BMP ID	BMP Category	BMP Subcategory	BMP Description	Year Goal 8 Milestone	Year 8 Activities	Year 8 Status
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 if repairs	University Facilities & Services Plumbers dye tested and found two improper connections. A sump pump illicit connection in the Observatory Room 20 mechanical space that was improperly connected to storm and rerouted to sanitary, and, a drain at the VetMed Ag Barn building 0963 that was connected to a sediment basin/septic tank/sanitary instead of directly to sanitary so it was rerouted to connect to a sanitary line already on site. Reported to the local sanitary district on May 9, 2023.	Compliant
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 by the Facilities & Services Maintenance Department along the accessible campus areas of the Embarras tributary near Windsor and S. First St. on November 4, 2023. No major issues were found and litter cleanup occurred the same day. The Facilities & Services Maintenance Department also visually inspected the Boneyard Creek on campus between 6th Street and Gregory on November 4, 2023. No major issues were found and litter cleanup occurred the same day.	Compliant
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. https://fs.illinois.edu/facilities-standards/	Compliant
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 posters are located in various campus buildings and distributed at expos and community events. The spill response procedures and poster pdfs are also on the Facility & Services, Safety & Compliance website to provide guidance on what to look for and who to contact for assistance. https://fs.illinois.edu/stormwater-management/	Compliant
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	University Facilities & Services, Environmental Compliance attends and speaks with contractors and consultants at pre-construction meetings for projects that require a stormwater permit and SWPPP. Environmental Compliance also attends design meetings to work with consultants on the stormwater permit and SWPPP process. Email correspondence and project review occurs.	Compliant
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).	Compliant

Attachment A - Permit Cycle 3, Year 8 Storm Water Activity Report

BMP ID	BMP Category	BMP Subcategory	BMP Description	Year Goal 8 Milestone	Year 8 Activities	Year 8 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/E to prepare SWPPPs as referenced in Facility Standards 31 25 00 Soil Erosion and Sedimentation Control. https://fs.illinois.edu/facilities-standards/ . There were 5 projects permitted in this reporting period and 3 of those are still active SWPPPs at CERL EPIC, UI Foundation Headquarter Building, and UIUC South Campus Center for Interdisciplinary Learning/SCCIL/Wymer Hall.	Compliant
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 were 5 projects permitted in this reporting period and 3 of those are still active SWPPPs at CERL EPIC, UI Foundation Headquarter Building, and UIUC South Campus Center for Interdisciplinary Learning/SCCIL/Wymer Hall.	Exceeded Goals
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 site along with outreach posters on F&S Safety & Compliance website (three 2022 spill response posters, 2 litter posters and a 2023 Solution to Pollution brochure). We also have four training documents posted called Toolbox Talk regarding permits, spills, erosion control and winter de-icing material storage/use https://fs.illinois.edu/stormwater-management/	Compliant
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 also has a construction Environmental Requirements Site Enforcement Program in the Facility Standard Section 01 35 43 https://fs.illinois.edu/facilities-standards/	Compliant
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 documented weekly and after 0.5 inch rain. University inspectors complete visual inspections at least monthly and report potential issues when they are on construction sites, typically more than once month.	Compliant
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 incorporates the construction Environmental Requirements Site Enforcement Program and Progressive Enforcement Remedies into PSC bid/contract documents and Facility Standards 01 35 43. https://fs.illinois.edu/facilities-standards/ . Facility Standard reference is also included in the Professional Services Consultant Agreements.	Compliant

Attachment A - Permit Cycle 3, Year 8 Storm Water Activity Report

BMP ID	BMP Category	BMP Subcategory	BMP Description	Year Goal 8 Milestone	Year 8 Activities	Year 8 Status
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	Environmental Compliance 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).	Compliant
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 Team, the Illinois Climate Action Plan Working Group, and the Capital Programs Construction review process. Also, per the Facility & Services Facility Standards, all construction projects involving stormwater improvements are required to incorporate green infrastructure and low impact design. https://fs.illinois.edu/facilities-standards/	Compliant
E.4.1	Post-Construction Runoff Control	Pre-Construction Review of BMP Designs	Plant preservation walkthrough or design review during pre-construction site inspections.	Conduct pre-construction walk-through or design review to Accomplish Plant Preservation	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 will perform online GIS reviews and provide comments on plant preservation.	Compliant
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 inspect for immediate concerns and also performs an annual inspection in which they fill out a checklist. The last annual documented inspection occurred on 4-20-23.	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 and the Utility Program Statements include this in the design review process.	Compliant
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 which was updated in May 2021. The University conducted the FRP exercise on 9-28-2023 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, Champaign County, UI Public Safety, Illinois Environmental Protection Agency and Champaign Fire Department.	Compliant

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BMP ID	BMP Category	BMP Subcategory	BMP Description	Year Goal 8 Milestone	Year 8 Activities	Year 8 Status
F.1.2	Pollution Prevention/Good Housekeeping	Employee Training Program	Implement SPCC Plan	Implement and update SPCC Plan and conduct annual training	The University SPCC Coordinator held two training sessions on December 6 and 12, 2023 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 and currently has 7 facility plans. The Abbott Power Plant SPCC was updated in January 2023.	Compliant
F.1.3	Pollution Prevention/Good Housekeeping	Employee Training Program	Laboratory and Hazardous Material Training	Make training sessions available	The calendar year 2023 chemical management University Division of Research training attendees include: Hazard Communication – 1,768 Chemical Safety: An Introduction – 1,303 Laboratory Safety – 5,666	Compliant
F.1.4	Pollution Prevention/Good Housekeeping	Employee Training Program	Pesticide Application Training	Annually review licensing. And 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 38 out of 45 employees in the Grounds department are licensed. The employees who apply pesticides are licensed.	Compliant
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	Environmental Compliance provided annual storm water training to the following Facilities & Services groups: Construction Services on 1/22/24, and, Capital Programs and also the Labor Shop on 2/19/24. Topics discussed included permits, erosion control, spill reporting, SWPPP requirements and the new inspector training certification and dewatering inspection requirements. Some staff members from Environmental Compliance, Capital Project Management Engineering Services Construction Superintendent/Inspectors and the Labor Shop have completed the inspector training and received certification.	Compliant
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 employee training (during 6 month employee evaluation) and annual inspections of all car, trucks 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.	Compliant

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BMP ID	BMP Category	BMP Subcategory	BMP Description	Year Goal 8 Milestone	Year 8 Activities	Year 8 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 as well as periodic repairs and maintenance. For the dates 4/1/2023 - 3/31/2024, there were 3 Preventative Maintenance and 20 other/repair Work Orders completed. These consisted of numerous storm sewer inlet repairs, cleaning clogged sewers, and the repair of campus storm sewers.	Compliant
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. For the dates 4/1/2023 - 3/31/2024, there were 186 Preventative Maintenance, 5 repairs and 7 operations 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.	Compliant
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 2023 387,342 pounds were generated including the amount in storage awaiting disposal at the end of calendar year. The amount shipped for proper disposal was 384,054 pounds.	Compliant
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 and a total of 1,479.96 tons of waste diverted from the waste stream in FY23: 657.11 tons of baled commodities (paper, cardboard, plastic #1, aluminum cans), 581.96 tons of metal, 231 tons of dining hall food waste diverted via Grind2Energy, and 9.89 tons of miscellaneous household items diverted via Dump & Run. Also, daily floor wash downs occur and 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. Recyclables are stored in trailers and batteries are in a covered area.	Compliant
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 4 month fixed PM work order for the Plumbers to hire a vender (currently Bergs) to inspect/clean the triple basins and oil water separator. Bergs serviced the triple basins and oil water separator on at Garage and Car Pool on 4/3/2023, 8/15/2023 and 12/11/2023. The wash bay drain was also serviced on the same work orders as the basin.	Exceeded Goals

Attachment A - Permit Cycle 3, Year 8 Storm Water Activity Report

BMP ID	BMP Category	BMP Subcategory	BMP Description	Year Goal 8 Milestone	Year 8 Activities	Year 8 Status
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	<p>April 1, 2023 through March 31, 2024 Facilities & Services Grounds Department applied 21,780 pounds of granular fertilizer, 50 pounds of granular fertilizer with Merit grub control, 172 gallons of liquid weed control and 3650 pounds of Snapshot 2.5TG pre-emerge herbicide. No fungicide was used. The University operated the Pesticide Rinsate Facilities for F&S Grounds in accordance with the Illinois Department of Agriculture Lawncare Containment permit which is valid 7/2/2020 – 7/2/2025.</p> <p>The Integrated Pest Management Plan and was completed in December 2018 with an update in February 2022. The policy is posted on the Facilities & Services website https://fs.illinois.edu/Providers/grounds (under documents, Integrated Pest Management Program).</p>	Compliant
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 and for special events.	Compliant
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 twice each week. These include: C-7 (6th & John), C-10 (5th & Daniels), B-4 (North Campus Parking Deck), F-29 (Dorner Dr) and KCPA (Krannert loc #52). A new parking deck E-15 (4th & Pennsylvania) is currently swept once a week until a wider sweeper can be obtained. Annually, the University hires a vender (currently Bergs) to check parking deck triple basins water and sediment levels. Six locations (13 basins) at C-7, C-10, B-4, F-29, KCPA and fire station were checked on 7/5/23, 7/28/23 and 8/1/23, Berg serviced/cleaned the basins.	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 (who now operates under Enviroserve) for emergency response services. They are available 24 hours to assist with spill response.	Compliant
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 for the deicing season, the training last occurred on 1/12/24. 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 training document has been developed and updated for Facilities and Services staff that perform de-icing activities.	Compliant

Attachment A - Permit Cycle 3, Year 8 Storm Water Activity Report

BMP ID	BMP Category	BMP Subcategory	BMP Description	Year Goal 8 Milestone	Year 8 Activities	Year 8 Status
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 Facilities & Services groups: Construction Services on 1/22/24, and, Capital Programs and the Labor Shop on 2/19/24. These individuals either manage construction projects and contractors, or help coordinate spill response. Environmental Compliance also attends pre-construction meetings with contractors. During these trainings/meetings, erosion control, spill reporting, SWPPP requirements and the new inspector training certification and dewatering inspection requirements were discussed. These items along with green infrastructure and low impact design techniques, are also communicated to the project AE. The University also maintains rules in our Facility Standards to reduce stormwater pollution.	Exceeded Goals

Attachment B

Permit Cycle 3, Year 9 Proposed NPDES Storm Water BMPs

Attachment B - Cycle 3 Year 9 Proposed BMPs

BMP ID	BMP Category	BMP Subcategory	BMP Description	Year 9 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 during even years; host conference during odd years
B.1.1	Public Participation & Involvement	Public Panel	Participation by the campus community and students in campus storm water initiatives (i.e. Illinois Climate Action Plan, Sustainable Working Advisory Teams, Student Sustainability Committee)	Public Panel
B.3.1	Public Participation & Involvement	Stakeholder Meeting	Meet with stakeholder group	Stakeholder Meeting
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.	Public Hearing
B.6.1	Public Participation & Involvement	Program Involvement	Quarterly MS4 Committee meetings	Program Involvement

Attachment B - Cycle 3 Year 9 Proposed BMPs

B.7.1	Public Participation & Involvement	Other Public Involvement	Sponsor one campus cleanup event annually.	Other Public Involvement
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 labeling 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 if needed
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
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

Attachment B - Cycle 3 Year 9 Proposed BMPs

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 at SWPPP sites 2) University inspect monthly at SWPPP sites
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.

Attachment B - Cycle 3 Year 9 Proposed BMPs

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 Plans	Implement and update SPCC Plans. 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.

Attachment B - Cycle 3 Year 9 Proposed BMPs

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.	Maintain programs and 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 waste 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	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.

Attachment B - Cycle 3 Year 9 Proposed BMPs

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.
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 8 Changes To BMPs

Attachment C - Cycle 3 Year 8 BMP Changes

BMP ID	BMP Category	BMP Subcategory	BMP Description	Measurable Goal Milestone	BMP Changes	Justification
NA						