

UNIVERSITY OF ILLINOIS
AT URBANA - CHAMPAIGN

Facilities & Services

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



May 29, 2014

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: 2013-2014 Annual Facility Inspection Report
Municipal Separate Storm Sewer Systems (MS4)
National Pollutant Discharge Elimination System (NPDES) Permit No. ILR400523
University of Illinois at Urbana-Champaign (University)

Dear Sir or Madam:

Enclosed is the Annual Facility Inspection Report required by the University's MS4 NPDES permit. This report covers the period from April 1, 2013 to March 31, 2014. If you have any questions regarding the information contained in this report, please contact Ms. Eliana Brown at (217) 265-0760.

Sincerely,

A handwritten signature in black ink, appearing to read 'David B. Wilcoxon'.

David B. Wilcoxon
Associate Director, Safety and Compliance

Enclosure



ILLINOIS

UNIVERSITY OF ILLINOIS AT URBANA-CHAMPAIGN

Annual MS4 Facility Inspection Report

Reporting Period: March 2013 - March 2014

Introduction

The National Pollutant Discharge Elimination System (NPDES) Stormwater Phase II Rule requires small municipal separate storm sewer systems (MS4s) to obtain an NPDES stormwater discharge permit from the Illinois Environmental Protection Agency (IEPA). Permit coverage allows an MS4 to discharge stormwater to surface water.

The University of Illinois at Urbana-Champaign (University) meets the definition of a regulated small MS4 and sought cooperation from surrounding small MS4s to combine efforts and share costs to develop its NPDES permit application (Notice of Intent, NOI) and associated Stormwater Management Program (Program). The MS4 Cooperators continue to meet and include the University, City of Champaign, City of Urbana, Village of Savoy and Champaign County.

The University's Program has six elements that, when implemented together, are expected to reduce pollutants discharged into receiving water bodies to the maximum extent practicable (MEP), protect water quality, and satisfy the appropriate water quality requirements of the Clean Water Act. The elements, or minimum control measures, are: Public Education and Outreach, Public Involvement/Participation, Illicit Discharge Detection and Elimination, Construction Site Runoff Control, Post-Construction Runoff Control, and Pollution Prevention/Good Housekeeping. For each element, the University selected best management practices (BMPs) and measurable goals that address stormwater pollution prevention.

The University sent a renewal NOI for Permit No. ILR400523 on October 2, 2013.

This Annual Facility Inspection Report (Report) is organized according to the IEPA Report Form WPC 691. The Report describes and evaluates the University's Program activities between March 2013 and March 2014.

Section A: Changes to Best Management Practices

Please see Attachment 1 for Changes to Best Management Practices.

Section B: Permit Compliance Assessment

Section B.1: Compliance Status with Permit Conditions and Goals

The University's Stormwater Management Program proposed implementing forty-five (45) BMPs. These BMPs addressed each of the six minimum control measures. The University took an aggressive approach by implementing all but two of the BMPs and exceeding performance goals for six of them.

Section B.1.1: Best Management Practices Surpassing Goals

The University exceeded its BMP performance goals in four of the required control measures: Public Education and Outreach, Public Participation & Involvement, and Pollution Prevention/Good Housekeeping. The following table provides a list of the BMPs for which the University exceeded performance goals. For additional details on these BMPs, refer to the Compliance Summary in Attachment 2.

Table 1: BMPs Surpassing Performance Goals

ID	Category	Description
A.1.1	Public Education and Outreach	Stormwater fact sheet on Website.
A.1.2	Public Education and Outreach	Publish one press release.
B.7.1	Public Participation & Involvement	Sponsor one clean up event a year.
D.4.1	Construction Site Runoff Control	Review SWPPPs and Erosion Control Plans.
F.6.3	Pollution Prevention/Good Housekeeping	Monthly sweeping of 70% of campus streets

Section B.1.2: Best Management Practices Pending

The University made a significant effort to substantially complete this year's BMPs. The University did not implement BMP F.3.1: Storm sewer system and catch basin inspection and cleaning program and BMP F.3.2: Sanitary sewer system and catch basin inspection and cleaning program. The University came very close to fully implementing BMP F.3.2. These BMP's are updated for next year (Attachment 1.)

Section B.2: Ability of selected BMPs to reduce the discharge of pollutants to the maximum extent practicable (MEP).

A regulated source must successfully implement approved BMPs in order to comply with the MEP technical standard. The Illinois EPA approved the University's proposed BMPs and measurable goals on February 26, 2009. The controls the University has proposed and implemented are currently the most appropriate methods available to protect water quality.

The University implemented BMPs in each of the six required program minimum control measures and, as previously mentioned, substantially completed nearly all of its proposed BMPs. Further, the University exceeded performance goals and has done this for the past 10 years. Based on this performance, it is clear that the University put considerable effort into protecting water quality this year, and gained significant progress towards achieving the statutory goal of reducing pollutant discharge to the MEP.

Tables 2-7 provide a brief summary of the stormwater quality benefits associated with each of the BMPs. The tables are organized according to the six minimum control measures.

Tables 2 - 7: BMPs and Stormwater Quality Benefits

Table 2: Public Education and Outreach

BMP ID	Stormwater Quality Benefits
A.1.1: Stormwater fact sheet.	Fact sheets increase public awareness about water quality issues. The University posts facts sheets on the website.
A.1.2: Press release.	Newspapers are powerful vehicles for delivering educational information. Published items can be read by countless people at minimal cost.
A.1.3: Stormwater Website.	Websites are an effective way to reach a large audience and deliver information.
A.2.2: Presentation to architect, engineer or contractor group.	Presentations serve as stormwater protection awareness training for University and private contractors, engineers, planners, and developers. Presenting the message directly is very effective in reaching these target audiences.
A.3.1: Public service announcement.	Public service announcements about protecting stormwater serve as a unique way to bring about public awareness. Facebook is a highly effective social media tool that reaches a vast and diverse audience.
A.4.1: Information booth at campus function.	Campus functions provide opportunities for sharing information, educating and involving the students, promoting volunteerism, and building general awareness.
A.4.2: Community Partner Collaboration	More community stormwater initiatives improve water quality.

Table 3: Public Participation & Involvement

BMP ID	Stormwater Quality Benefits
B.1.1: Create and conduct campus surveys	Surveys measure the program's efficacy.
B.3.1: Meet with stakeholder group.	Collaborating with campus stakeholder group(s) helps to ensure that stormwater quality is a part of campus goals.
B.6.1: Quarterly MS4 Cooperators Meetings.	The MS4 Cooperators collaboration enables the communities and University to share information and resources. This allows the entities to be proactive and creative in their efforts to protect and improve stormwater quality.
B.7.1: One clean up event a year	Clean up events promote awareness about littering and good disposal habits.

Table 4: Illicit Discharge Detection and Elimination

BMP ID	Stormwater Quality Benefits
C.1.1: Analyze and validate storm sewer map and develop GIS system map.	An accurate storm sewer map enables the University to identify, trace, and remove illicit discharges.
C.2.1: Prohibit illegal discharges to storm sewer system.	The Campus Administrative Manual prohibits liquid waste disposal to the storm sewer. This Manual is accessible on-line at the University's website.
C.3.1: Identify priority areas likely to have illicit discharges	The University's Illicit Discharge Detection and Elimination Plan focuses on removing wastewater discharges from the campus storm drains and receiving streams.
C.3.2: Septic system inventory and management program.	Failing septic systems can be a source of pollutants to groundwater and surface water. Knowing the locations of University septic systems enable the University to develop a management program. Identifying and eliminating failing septic systems helps control contamination of ground and surface water supplies from untreated wastewater discharges.
C.6.1: Annual sewer report to UCSD.	Documenting discovery and repair of improperly connected sanitary discharges in the Annual Status Report on University Sanitary Sewers helps the University track and prioritize repair of such illicit connections.
C.10.1: Organize and conduct stenciling or stickering of 50% of all targeted main campus storm inlets.	Stenciling/stickering projects raise awareness that storm inlets drain into waterways, thus encouraging proper trash disposal and clean streams.
C.10.2: Construction standard that requires stormwater protection warning on new storm sewer inlets.	Storm sewer inlets with a stormwater protection warning offer an opportunity to educate the public about the link between the storm drain system and water quality.
C.10.3: Publicize and encourage spill reporting procedures.	Publicizing spill reporting procedures encourages public participation in protecting and improving water quality.

Table 5: Construction Site Runoff Control

BMP ID	Stormwater Quality Benefits
D.2.1: Pre-construction briefings for sites > 1 acre.	Contractors are ultimately responsible for the proper installation and maintenance of stormwater pollution prevention practices on construction sites. Briefing the contractors and consultants helps improve compliance with site requirements and fosters better relationships between contractors and the University.
D.2.2: Project manager training.	Training helps University project managers ensure that the contractor implements the Stormwater Pollution Prevention Plan (SWPPPs) and installs and maintains appropriate BMPs.
D.2.3: Stormwater Management Team.	The University's Stormwater Management Team members are from departments that are involved with construction on campus. They help educate their respective departments and communicate departmental concerns and issues about protecting stormwater runoff from construction sites.
D.2.4: Prepare SWPPP for each project one acre or more.	The University Facility Standards require construction projects to develop and implement SWPPPs for projects that disturb one acre or more. As such, contractors are bound by contract to comply with the SWPPP requirements.
D.4.1: Review at least 75% of SWPPPs.	The University strives to review each SWPPP during the planning stage of all construction projects. This ensures that each project develops an effective SWPPP that, at a minimum, meets General Permit ILR10 requirements.
D.5.1: Prepare spill reporting procedures and link to University homepage.	Posting spill reporting procedures at the University's website is a quick, inexpensive way to educate the campus community on how and who to contact in the event of a spill on campus. Having accessible, clear procedures for reporting a spill can improve response time and subsequently limit adverse impact to surface water.
D.6.1: Enforce contractor requirements.	The University's contract language requires contractors to comply with State and Federal environmental laws and regulations and specifies that the University may stop payment, stop work, or back charge for noncompliance. This allows the University to act promptly and strongly to SWPPP violations at construction sites.
D.6.2: Conduct construction site inspections.	Routine inspection and maintenance is an efficient way to prevent potential nuisance situations, reduce the need for repair maintenance, and reduce the chance of polluting stormwater runoff by finding and correcting problems before the next rain.
D.6.3: Develop and implement procedures for handling reports of non-compliance.	The University's Construction Site Enforcement Program includes several effective and progressive enforcement remedies that the University can use in response to reports of noncompliance at construction sites. These remedies include a Warning, Notice of Noncompliance, Stop Work, Stop Payment, Back Charge, and referral to IEPA.

Table 6: Post-Construction Runoff Control

BMP ID	Stormwater Quality Benefits
E.2.1: Upgrade stormwater management policy.	A review of the stormwater management policy ensures that that the document is up-to-date.
E.3.1: Evaluate bio-retention areas for surface parking lots.	Incorporating bio-retention areas or other stormwater management and treatment alternatives to surface parking lots helps remove pollutants from stormwater runoff.
E.4.1: Plant preservation walkthrough.	Identifying plant material to be preserved for each new development or redevelopment on campus will help retain vegetative cover that may reduce stormwater runoff rates and increase pollutant removal.
E.6.1: Develop procedures and checklist for inspection and maintenance of retention basins.	Inspecting retention basins on a regular cycle will ensure that they continue to operate effectively. These inspections also provide an excellent opportunity to monitor for illicit discharges or spills to storm sewers that empty into the basin.
E.7.1: Use Low Impact Development methods when possible to maintain or reduce peak stormwater runoff characteristics of new construction.	Low Impact Development methods are an alternative approach to conventional stormwater practices. The benefits include habitat protection, reduced flooding risk, water quality improvements, and increased aesthetics.

Table 7: Pollution Prevention / Good Housekeeping

BMP ID	Stormwater Quality Benefits
F.1.1: Abbott Power Plant Facility Response Plan	The Facility Response Plan describes the University's response to a worst-case oil discharge and to a substantial threat of such discharge. Having a plan in place and implementing training exercises may reduce a discharge's impact and severity.
F.1.2: Implement SPCC Plan	The SPCC Plan establishes procedures, methods, equipment and other requirements to prevent the discharge from oil storage tanks and containers into surface and ground water. Training ensures that campus units are aware of these procedures.
F.1.3: Laboratory and hazardous materials training	Training sessions educate laboratory personnel on proper hazardous materials disposal. This helps prevent illicit discharges and illegal dumping of chemicals to the storm sewer.
F.1.4: Pesticide application training	Improper fertilizer and pesticide application can result in stormwater contamination. The University reduces this risk by following State guidance on pest management and training employees.
F.2.1: Maintenance and repair programs for campus vehicles	Consistent vehicles maintenance helps reduce oil and automotive fluid leaks, which may otherwise become stormwater pollutants.
F.3.1: Storm sewer system and catch basin inspection and cleaning program	Routine storm sewer cleaning reduces pollutants, trash, and debris both in the storm drain system and in receiving waters. Benefits of cleaning include increased dissolved oxygen, reduced levels of bacteria, and support of in-stream habitat.
F.3.2: Sanitary sewer system/catch basin inspection and cleaning program	Routine sanitary sewer cleaning provides opportunities to detect and remove illicit connections.
F.4.1: Hazardous waste management and pickup program	This program facilitates a greater awareness of the problems caused by mishandling and disposal of hazardous chemicals. Properly disposing of hazardous wastes ensures that contamination through leaks and spills does not occur.
F.4.2: Provide recycling service	Effective recycling programs reduce the quantity of waste being disposed of in landfills. Keeping the recycling materials under cover eliminates their exposure to stormwater. Trash in water bodies poses a threat to wildlife and human health.
F.6.1: Direct vehicle washing to sanitary sewer	Car washing potentially results in high loads of nutrients, metals, and hydrocarbons in watersheds. As such, vehicle washing for University vehicles is directed to the sanitary sewer.
F.6.2: Pesticide application and management controls	Tracking records of pesticide use on campus helps the University control its inventory and ensure that none is lost via leaking containers or overuse, both can lead to stormwater pollution.
F.6.3: Street sweeping	Street sweeping practices are designed to remove from road surfaces sediment debris and other pollutants that are a potential source of pollution impacting waterways.
F.6.4: Parking deck cleaning	Parking structure sweeping and cleaning practices are designed to remove debris and other pollutants from parking lot surfaces.
F.6.5: Emergency response contractor continuing purchase order	The University maintains a contract with two emergency response contractors to respond to afterhours spills. Having these contracts in place may reduce a discharge's impact and severity.

Attachment 1 – Changes to BMPs

Reword BMP No. A.1.1

Brief Description of BMP: Stormwater factsheets and posters on Environmental Compliance website.

Measurable Goal(s), including frequencies: Continue posting materials on website.

Milestones: Years 1 - 5: Post materials.

Reword BMP No. A.2.2

Brief Description of BMP: Information presentation or information booth.

Measurable Goal(s), including frequencies: Arrange and schedule presentation or booth; make one presentation or staff one booth each year.

Milestones: Years 1 - 5: Complete one presentation or staff one booth each year.

Reword BMP No. A.3.1

Brief Description of BMP: Public service announcement.

Measurable Goal(s), including frequencies: Establish broadcast schedule for local radio station(s) and/or internet. Implement broadcast schedule.

Milestones: Years 1 - 5: Broadcast the PSA each year.

Reword BMP No. A.4.1

Brief Description of BMP: Biennial Green Infrastructure Conference.

Measurable Goal(s), including frequencies: Arrange and host a biennial green infrastructure conference.

Milestones: Year 1: Plan next year's conference.
Year 2: Host and participate in conference.
Year 3: Plan next year's conference.
Year 4: Host and participate in conference.
Year 5: Plan next year's conference.

Reword BMP No. C.3.1

Brief Description of BMP: Investigate priority areas likely to have illicit discharges and correct improper connections.

Measurable Goal(s), including frequencies: Investigate campus building drains. Develop dye test and drain labelling and/or repair list.

Milestones: Years 1-5: Investigate campus building drains. Develop dye test and drain labelling and/or repair list.

Reword BMP No. C.3.2

Brief Description of BMP: Maintain an inventory of and management program for existing septic systems.

Measurable Goal(s), including frequencies: Update septic system inventory management program.

Milestones: Years 1 - 5: Update inventory and plan as changes occur.

Reword BMP No. E.6.1

Brief Description of BMP: Inspect and maintain retention basins.

Measurable Goal(s), including frequencies: Inspect retention basins monthly.

Milestones: Years 1 - 5: Inspect retention basins monthly.

Reword BMP No. F.3.1

Brief Description of BMP: Storm sewer system and catch basin inspection and cleaning program.

Measurable Goal(s), including frequencies: Inspect and clean as necessary.

Milestones: Years 1 - 5: Inspect and clean as necessary.

Reword BMP No. F.3.2

Brief Description of BMP: Sanitary sewer system inspection and cleaning program.

Measurable Goal(s), including frequencies: Inspect and clean as necessary.

Milestones: Years 1 - 5: Inspect and clean as necessary.

Reword BMP No. F.6.2

Brief Description of BMP: Pesticide use policy.

Measurable Goal(s), including frequencies: Develop Pesticide Use Policy. Maintain records of chemical inventory and amounts applied. Operate Rinsate Facility in compliance with IEPA permit requirements.

Milestones: Year 1: Draft Pesticide Use Policy. Record pesticide amounts applied.
Operate Rinsate Facility in compliance with IEPA permit requirements.

Years 2 - 5: Record pesticide amounts applied.

Establish BMP No. F.6.6

Brief Description of BMP: Salt/Sand Use Policy.

Measurable Goal(s), including frequencies: Develop Salt/Sand Use Policy. Record amounts applied and describe current practices.

Milestones: Year 1: Draft Salt/Sand Use Policy. Record salt and sand amounts applied.

Years 2 - 5: Record salt and sand amounts applied.

Establish BMP No. F.6.7

Brief Description of BMP: Landscape Use Policy.

Measurable Goal(s), including frequencies: Document current Landscape Use practices.

Milestones: Year 1: Draft Landscape Use Policy.

Attachment 2 – Compliance Summary

BMP ID	BMP Category	BMP Subcategory	BMP Description	2013-2014 Measurable Goal Milestone	2013-2014 Activities
A.1.1	Public Education and Outreach	Distribute Paper Material	Stormwater fact sheet on Safety & Compliance Website	Maintain one fact sheet at website.	Maintained 3 fact sheets posted at S&C website. Distributed anti-littering poster (He Shoots He Scores) to Housing on Oct 23, 2012. 34 copies for all dorms.
A.1.2	Public Education and Outreach	Distribute Paper Material	Press Release	Publish one press release.	Published four press releases in the Daily Illini (campus newspaper) for the New Student Edition (July 24, 2013), Move In Edition (August 16, 2013), Welcome Back Edition (August 21, 2013) and Quad Day Edition (August 23, 2013).
A.1.3	Public Education and Outreach	Distribute Paper Material	Stormwater Website	Maintain website	Maintained a stormwater website. URL is http://fs.illinois.edu/services/safety-and-compliance/stormwater-management
A.2.2	Public Education and Outreach	Speaking Engagement	Presentation to architect, engineer or contractor group	Make one presentation.	Presented storm water information to project contractors with sites >1 acre.
A.3.1	Public Education and Outreach	Public service announcement	Public service announcement	Prepare PSAs as opportunities exist. Post PSAs on Facebook at least once a year.	Facilities and Services posted multiple times on the Facebook page. Additionally, a 30-second audio PSAs were available on the stormwater website.

A.4.1	Public Education and Outreach	Community Event	Information booth at campus function	Make one presentation or staff one booth.	Presented to Master Naturalists on Oct. 15, 2013.
A.4.2	Public Education and Outreach	Community Partner Collaboration	Collaboration	Collaborate with community partners on stormwater initiatives as opportunities arise.	Collaborated with the City of Champaign, the Urbana Park District, the Public Art League, and the Soil & Water Conservation District to commission 9 Storm Drain Murals in Champaign Urbana.
B.1.1	Public Participation & Involvement	Public Panel	Create and conduct campus surveys	Create and conduct campus surveys	Updated and conducted surveys.
B.3.1	Public Participation & Involvement	Stakeholder Meeting	Meet with Committee for a Sustainable Campus Environment.	Meet once with Committee.	This Committee was disbanded. Met with Student Sustainable Committee Water Working Group on January 23, 2014.
B.6.1	Public Participation & Involvement	Program Coordination	Quarterly MS4 Committee meetings	Meet four times.	The Cooperating MS4s met four times.
B.7.1	Public Participation & Involvement	Clean up Event	One Clean up event a year		Sponsored two clean ups: Boneyard Creek Community Day (April 6, 2013) and iHelp (October 18, 2013).
C.1.1	Illicit Discharge Detection and Elimination	Storm Sewer Map Preparation	Analyze and validate sewer map and develop GIS system map	Continue to analyze and validate existing sewer map and develop GIS system map.	The University has a GIS system map and is the process of validating it and adding additional functionality by including trace analysis. Further, the University is incorporating the Illicit Discharge Detection and Elimination Plan findings with this effort.

C.2.1	Illicit Discharge Detection and Elimination	Regulatory Control Program	Prohibit illegal discharges to storm sewer system	Include prohibition in Campus Administrative Manual.	Discharge to storm sewers is restricted in the Campus Administrative Manual at V-b-3.1: Liquid Waste Disposal.
C.3.1	Illicit Discharge Detection and Elimination	Detection/Elimination Prioritization Plan	Identify priority areas likely to have illicit discharges	Evaluate and review priority areas and form Plan to detect and address these areas. Conduct dry weather screening of 25% of priority areas.	This year's review for the Illicit Discharge Detection and Elimination Plan is complete. Some drains were reinspected to ensure validity, thus, 4,876 drains were inspected. None of these drains were connected improperly.
C.3.2	Illicit Discharge Detection and Elimination	Detection/Elimination Prioritization Plan	Prepare an inventory of and management program for existing septic systems.	Prepare inventory and management program.	The University has a septic tank identification map and management program.
C.6.1	Illicit Discharge Detection and Elimination	Program Evaluation and Assessment	Develop annual report to Urbana-Champaign Sanitary District documenting illicit connections repaired.	Complete one annual report.	The University completed its Annual Status Report on 2013-2014 University Sanitary Sewers and submitted it to UCSD on February 16, 2014.
C.10.1	Illicit Discharge Detection and Elimination	Other Illicit Discharge Controls	Organize and conduct stenciling or stickering of 50% of all targeted main campus storm inlets.	None	The University partnered with the Public Art League to commission artists to paint 3 stormwater themed murals near campus storm drains.

C.10.2	Illicit Discharge Detection and Elimination	Other Illicit Discharge Controls	Develop construction standard requiring new storm sewer inlets to have storm water protection warning	Maintain use of construction standard.	The University Facility Standards for Storm Water Drainage Systems and Storm Sewerage Sections requires that all storm grates and curb inlets include a message similar to "Dump No Waste - Drains to River." The associated Standard Drawing includes the same message.
C.10.3	Illicit Discharge Detection and Elimination	Other Illicit Discharge Controls	Publicize and encourage spill reporting procedures	Maintain spill response link.	The University Spill Response information posters are located in F&S buildings and in a building next to Boneyard Creek. University spill response procedures are also on the Facility and Services, Safety and Compliance website. These provide guidance on what to look for and whom to contact.
D.2.1	Construction Site Runoff Control	Erosion and Sediment Control BMPs	Pre-construction briefings for sites > 1 acre	Brief contractor and consultant before each applicable project.	The University attended and spoke at all pre-construction and/or pre-bid meetings for construction projects that require a SWPPP.
D.2.2	Construction Site Runoff Control	Erosion and Sediment Control BMPs	Project manager training on soil erosion and sediment control requirements	Perform annual training for project managers and distribute evaluation survey.	Annual Project Managers training was March 17, 2014.

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.	The University Stormwater Management Team met on March 31, 2014 to discuss construction site runoff control (SWPPP review process, inspections, violations, training).
D.2.4	Construction Site Runoff Control	Erosion and Sediment Control BMPs	A/E must prepare SWPPP for project disturbing one acre or more	Maintain Facility Standard and continue to require A/E to prepare SWPPP.	The University requires the A/Es to prepare SWPPPs.
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.
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 maintains the spill reporting procedures on the Facilities & Services website.
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 require 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.

D.6.2	Construction Site Runoff Control	Site Inspection & Enforcement Procedures	Conduct construction site inspections.	1) Contractor inspect weekly and after 0.5 in rain 2) University inspect monthly	Contractor inspections are on-going. University inspectors are completing monthly inspections.
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	The University incorporated the Construction Site Enforcement Program and Progressive Enforcement Remedies into contract documents and Facility Standards.
E.2.1	Post-Construction Runoff Control	Regulatory Control Program	Upgrade stormwater management policy	None.	No upgrade necessary.
E.3.1	Post-Construction Runoff Control	Long Term O&M Procedures	Evaluate feasibility of bio-retention areas for new or redeveloped surface parking lots.	Complete evaluation if a new lot is planned or existing lot redeveloped.	No activity to report.
E.4.1	Post-Construction Runoff Control	Pre-Construction Review of BMP Designs	Plant preservation walkthrough during pre-construction site inspections	Identify plant material to be preserved for each new development or redevelopment.	The Campus Horticulturalist reviews project documents and performs walkthroughs.
E.6.1	Post-Construction Runoff Control	Post-Construction Inspections	Develop procedures and checklist for inspection and maintenance of retention basins.	Inspect basins monthly.	The University inspected campus retention basins three times per week and completed a checklist for each visit.

E.7.1	Post-Construction Runoff Control	Low Impact Development	Incorporate LID elements into Utility Program Statements	Incorporate LID elements into Utility Program Statements where applicable.	This was done for 100% of applicable projects.
F.1.1	Pollution Prevention/Good Housekeeping	Employee Training Program	Abbott Power Plant Facility Response Plan	Implement and update FRP. Conduct biannual training.	<p>The University has a Facility Response Plan for Abbott Power Plant. FRP Exercise was held Wednesday, November 6, 2013. The 2013 exercise was a worst case scenario exercise and included the following entities:</p> <ul style="list-style-type: none"> F&S Service Office F&S Spill Management Team F&S Environmental Compliance F&S Steam Distribution Staff F&S Abbott Power Plant Staff U of I Public Safety Champaign Fire Department Urbana Fire Department Savoy Fire Department County Emergency Management Agency

F.1.2	Pollution Prevention/Good Housekeeping	Employee Training Program	Implement SPCC Plan	Implement and update SPCC Plan. Conduct annual training.	In 2013, the University SPCC Coordinator held 2 training sessions for Unit Coordinators/Discharge Prevention Managers. The SPCC Coordinators, in turn, trained their oil handling employees. The University tracks oil storage containers on campus as required by 40 CFR 112 SPCC regulations.
F.1.3	Pollution Prevention/Good Housekeeping	Employee Training Program	Laboratory and Hazardous Material Training	Annual online training sessions available. Record number of people trained annually. Evaluate effectiveness and recommend improvements every two years beginning in Year 2.	Chemical management training numbers are as follows: UIUC Chemical Waste Requirements Training = 795; General Laboratory Safety Training = 3,572; Chemical Management for Laboratories Part 1 = 923; Chemical Management for Laboratories Part 2 = 917; Chemical Management for Laboratories Part 3 = 919; Chemical Management for Laboratories Part 4 = 912; Chemical Management for Laboratories Part 5 = 916; Chemical Management for Laboratories Part 6 = 914; Hydrofluoric Acid Safety = 361; Hazard Communication Training (Right-To-Know) = 32; MATSE = 600.

F.1.4	Pollution Prevention/Good Housekeeping	Employee Training Program	Pesticide Application Training	Annually review licensing. Provide annual training for all employees who apply pesticides.	The University Grounds crews follow Illinois Department of Agriculture Pesticide Applicator Training Manual Standards and Commercial Landscape and Turfgrass Pest Management Handbook guidelines when applying pesticides. The University annually provides pesticide application training to the Grounds Department employees. The employees who apply pesticides are licensed.
F.2.1	Pollution Prevention/Good Housekeeping	Inspection and Maintenance Program	Maintenance and repair programs for campus car, truck and heavy equipment pools	Written standard operating procedure for documentation.	The University has a written Vehicle Maintenance Program and conducts annual inspections of all car and heavy equipment pool vehicles. The inspection items include checking for oil and other fluid leaks. The University uses a checklist to document these inspections.

F.3.1	Pollution Prevention/Good Housekeeping	Municipal Operations Stormwater Control	Storm sewer system and catch basin inspection and cleaning program	Inspect and clean 1/5 of system annually.	The University has a written Storm Sewer Maintenance Program. This Program consisted to cleaning the storm sewers where compliants have been made. This is less than 1/5 of the entire system. The University repaired the storm sewer on the south side of the Illini Union and improved flow rate from approx 5% to about 90% which mitigated flooding.
F.3.2	Pollution Prevention/Good Housekeeping	Municipal Operations Stormwater Control	Sanitary sewer system and catch basin inspection and cleaning program	Inspect and clean 1/5 of system annually.	The University has a written Sanitary Sewer Maintenance Program. This year the Program consisted of cleaning the sanitary sewers at the Illini Union, Orchard Downs, Freer Gym, McKinley Health Center, two residence halls, Memorial Stadium, and at two houses. This is less than 1/5 of the entire system.
F.4.1	Pollution Prevention/Good Housekeeping	Municipal Operations Waste Disposal	Hazardous waste management and pickup program	Maintain and continue program. Record volume of waste picked up each year.	The University provides free hazardous waste pickup and disposal for all campus units. This year, the University picked up approximately 222,089 pounds of hazardous waste.

F.4.2	Pollution Prevention/Good Housekeeping	Municipal Operations Waste Disposal	Provide recycling service. At the Waste Transfer and Material Recovery Facility, direct daily wash down liquid to sanitary sewer and contain waste materials under cover to avoid contact with storm water.	Provide recycling service to main campus. Wash down Facility daily and direct liquid to sanitary sewer. 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.
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, with 100% of solids removed.	All vehicle washing took place in designated wash facilities. The University cleaned out the triple basin quarterly.
F.6.2	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Pesticide application and management controls	Document pesticide application procedures. Maintain records of chemical inventory and amounts applied. Operate Rinsate Facility in compliance with IL Dept. of Agriculture permit requirements.	Grounds applied 1,051 pounds and 330 gallons of herbicide, 0.5 pounds and 0.25 gallons of insecticide, and no fungicide. The University operated the Ground Pesticide Rinsate Facility in accordance with the Illinois Department of Agriculture Lawncare Containment.

F.6.3	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Street sweeping	Monthly sweeping of 70% of campus streets	University street sweeping occurs through agreement with the Cities of Champaign and Urbana. They provide removal of trash, sediment and leaves. The University facilitated cleanup of more than 70% of campus streets. The City of Champaign swept 158 miles of University streets. The City of Urbana swept 5,837 miles of University streets.
F.6.4	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Parking deck cleaning	Sweep parking decks weekly and clean annually. Clean out triple basin when 1/3 full of sediment.	The University swept and cleaned the parking decks three times each week. Annually, the University checks the water and sediment levels.
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.

Attachment 3 – Next Year's BMP Summary

BMP Summary
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BMP ID	BMP Category	BMP Subcategory	BMP Description	2014-2015 Measurable 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	Radio public service announcement	Public service announcement.	Broadcast one PSA.
A.4.1	Public Education and Outreach	Community Event	Biennial Green Infrastructure Conference.	Plan next year's conference.
B.1.1	Public Participation & Involvement	Public Panel	Create and conduct campus surveys.	None.
B.3.1	Public Participation & Involvement	Stakeholder Meeting	Meet with stakeholder group.	Meet once.
B.6.1	Public Participation & Involvement	Program Coordination	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	Storm 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.

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BMP ID	BMP Category	BMP Subcategory	BMP Description	2014-2015 Measurable Goal Milestone
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.10.1	Illicit Discharge Detection and Elimination	Other Illicit Discharge Controls	Organize and conduct drain marking program. Check and replace 50% of all targeted main campus storm inlets.	Check and replace 50% of all targeted main campus storm inlets.
C.10.2	Illicit Discharge Detection and Elimination	Other Illicit Discharge Controls	Maintain construction standard requiring new storm sewer inlets to have storm water protection warning.	Include standard in bid documents.
C.10.3	Illicit Discharge Detection and Elimination	Other Illicit Discharge Controls	Publicize and encourage spill reporting procedures.	Maintain spill response link and posters.
D.2.1	Construction Site Runoff Control	Erosion and Sediment Control BMPs	Pre-construction briefings for sites > 1 acre.	Brief contractor and consultant before each applicable project.

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BMP ID	BMP Category	BMP Subcategory	BMP Description	2014-2015 Measurable Goal Milestone
D.2.2	Construction Site Runoff Control	Erosion and Sediment Control BMPs	Project manager training on soil erosion and sediment control requirements.	Perform annual training for project managers.
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 SWPPS 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

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BMP ID	BMP Category	BMP Subcategory	BMP Description	2014-2015 Measurable Goal Milestone
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	Upgrade stormwater management policy.	Review stormwater management policy and make recommendations for improvement.
E.3.1	Post-Construction Runoff Control	Long Term O&M Procedures	Evaluate feasibility of bio-retention areas for new or redeveloped surface parking lots.	Evaluate rain garden or porous pavement possibilities for new or redeveloped lots.
E.4.1	Post-Construction Runoff Control	Pre-Construction Review of BMP Designs	Plant preservation walkthrough during pre-construction site inspections.	Conduct walk-through for each development and redevelopment
E.6.1	Post-Construction Runoff Control	Post-Construction Inspections	Inspect and maintain retention basins.	Inspect basins monthly.
E.7.1	Post-Construction Runoff Control	Other Post-Construction Runoff Controls	Incorporate Low Impact Development elements where applicable into Utility Program Statements in the project review process.	Incorporate Low Impact Development elements where applicable into Utility Program Statements in the project review process.
F.1.1	Pollution Prevention/Good Housekeeping	Employee Training Program	Abbott Power Plant Facility Response Plan.	Implement Plan. Conduct training exercises.
F.1.2	Pollution Prevention/Good Housekeeping	Employee Training Program	Implement SPCC Plan.	Implement and update SPCC Plan. Conduct annual training.
F.1.3	Pollution Prevention/Good Housekeeping	Employee Training Program	Laboratory and Hazardous Material Training.	Make training session available.

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BMP ID	BMP Category	BMP Subcategory	BMP Description	2014-2015 Measurable Goal Milestone
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.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 annually.
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 annually.
F.4.1	Pollution Prevention/Good Housekeeping	Municipal Operations Waste Disposal	Hazardous waste management and pickup program.	Maintain and continue program. Record volume of waste picked up each year.
F.4.2	Pollution Prevention/Good Housekeeping	Municipal Operations Waste Disposal	Provide recycling service at the Waste Transfer and Material Recovery Facility. Contain waste materials under cover to avoid contact with storm water.	Provide recycling service to main campus. Contain waste materials under cover at all times.
F.6.1	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Direct vehicle washing to sanitary sewer.	Clean vehicles only at designated wash facility. Check and cleanout triple basin twice each year.
F.6.2	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Pesticide use policy.	Draft Pesticide Use Policy. Record pesticide amounts applied. Operate Rinsate Facility in compliance with IEPA permit requirements.

BMP Summary
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BMP ID	BMP Category	BMP Subcategory	BMP Description	2014-2015 Measurable Goal Milestone
F.6.3	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Street sweeping.	Monthly sweeping of 70% of campus streets.
F.6.4	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Parking deck cleaning.	Sweep parking decks weekly and clean annually. Clean out triple basin when 1/3 full of sediment.
F.6.5	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Emergency response contractor continuing purchase order.	Ensure that contractor is available 24 hours to assist with spill response.