

UNIVERSITY OF ILLINOIS
AT URBANA - CHAMPAIGN

Facilities & Services

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



May 27, 2015

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: 2014-2015 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, 2014 to March 31, 2015. If you have any questions regarding the information contained in this report, please contact Jason Jones at (217) 300-1897.

Sincerely,

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

David B. Wilcoxon
Director, Environmental Compliance

Enclosure



Illinois Environmental Protection Agency

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

Division of Water Pollution Control ANNUAL FACILITY INSPECTION REPORT

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

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

Report Period: From March, 2014 To March, 2015

Permit No. ILR40 0523

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

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

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

University of Illinois at Urbana Champaign

THE FOLLOWING ITEMS MUST BE ADDRESSED.

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

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

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

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

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

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

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

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

Owner Signature:

David Wilcoxon

Printed Name:

5/27/15

Date:

Director, Environmental Compliance

Title:

EMAIL COMPLETED FORM TO: epa.ms4annualinsp@illinois.gov

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



ILLINOIS

UNIVERSITY OF ILLINOIS AT URBANA-CHAMPAIGN

Annual MS4 Facility Inspection Report

Reporting Period: March, 2014 – March, 2015

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 April 1, 2014 and March 31, 2015.

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-eight (48) BMPs. These BMPs addressed each of the six minimum control measures. The University took an aggressive approach by implementing all but three of the BMPs and exceeding performance goals for five 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 and Involvement, Construction Site Runoff Control, 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.1.2	Public Education and Outreach	Publish one press release.
A.3.1	Public Education and Outreach	Broadcast one PSA.
B.7.1	Public Participation and 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. Environmental Compliance experienced a staffing shortage during the reporting year. Despite the staffing shortage, all but three BMPs were implemented. The University did not fully implement the following BMPs:

- BMP A.4.1 – Planning of next year's Biennial Green Infrastructure Conference
- BMP F.6.2 – Draft a pesticide use policy
- BMP F.6.6 – Develop salt/sand use policy

The University is currently in the hiring process to fill the staffing vacancy. These BMPs are expected to be completed when Environmental Compliance is fully staffed.

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 11 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: Information Presentation or information booth.	Informational presentations and displays provide stormwater protection awareness for University and community members.
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: Biennial Green Infrastructure Conference.	Conferences expand upon existing professional networks and increase an awareness of new trends and educational opportunities.

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 Committee Meetings.	The MS4 Committee 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: Update storm sewer system map as changes occur.	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: Investigate 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: Maintain 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 drain marking program. Check and replace 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 feasibility of 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: Inspect and maintain 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: Incorporate Low Impact Development elements where applicable into Utility Program Statements in the project review process.	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.
F.6.6: Salt/sand use policy.	A salt/sand use policy encourages the prudent use of salt and sand at the University. Sufficient quantities of salt and sand should be used to keep street, parking lots and walkways safe from ice; however applications should be done carefully to minimize detrimental effects to waterways.
F.6.7: Landscape use policy.	Sustainable landscaping and maintenance activities such as using native and perennial plants allow for less maintenance and reduce water use, decrease runoff and sequester pollutants.

Section C: Information Collected and Analyzed

The University did not collect any stream samples for this report. The University did, however, inspect 1,422 interior building drains pursuant to the Illicit Discharge and Elimination Program. None of the inspected drains were incorrectly connected to the storm sewer system. As part of an illicit discharge investigation in April 2014, the University found and repaired a broken sanitary sewer adjacent to a storm sewer.

Section D: Stormwater Activities for the next year

The 2015-2016 Stormwater BMP Compliance Summary is included as Attachment 3 and describes the University's proposed stormwater activities that will be implemented between April 1, 2015 and March 31, 2016.

Section E: Other Government Entity Cooperation



Boneyard Creek Community Day 2014 (photo by Greg McIsaac)

The University is collaborating and sharing resources with the Cities of Champaign and Urbana, the Village of Savoy, and Champaign County (MS4 Cooperators).

The following are collaborative events:

- Boneyard Creek Community Day – April 14, 2014
- Fall Clean up Day (iHelp) – October 18, 2014

Both events successfully accomplish the goals of cleaning up the community and providing public education opportunities.

Section F: 2014-2015 Construction Projects

University projects that disturbed one acre or more between March 2014 and March 2015 and their associated completion status are listed in Table 8.

Table 8: 2014-2015 Construction Status

Project Name	Completion Status
Student Dining and Residential Program	In progress
Electrical and Computer Engineering	Complete
State Farm Center	In progress
4 th Street Improvements	Complete
DIA Golf Practice Facility	In progress

Attachment 1

Changes to BMPs

Changes to BMPs

Remove BMP No. C.10.1

Brief Description of BMP: Organize and conduct drain marking program.

Measurable Goal(s), including frequencies: Check and replace 50% of all targeted main campus storm inlets.

Justification: This BMP has been in place since 2005 which has provided substantial time to provide markings on the campus storm inlets. Additionally, BMP C.10.2 provides a process to continue the storm inlet marking program via university construction standards.

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 Illinois Department of Agriculture (IDoA) permit requirements.

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

Years 2 - 5: Record pesticide amounts applied.

Justification: The Illinois Department of Agriculture administers the Lawncare Containment Permit program. It was previously stated that the Illinois Environmental Protection Agency administered the program.

Reword BMP No. F.6.3

Brief Description of BMP: Street sweeping.

Measurable Goal(s), including frequencies: Monthly sweeping of campus streets between April and October.

Milestones: **Years 1 - 5:** Sweep campus streets at least monthly between April and October.

Justification: Existing maintenance agreements with the City of Champaign and the City of Urbana reference monthly sweeping of University streets.

Attachment 2

2014 – 2015 Stormwater BMP Compliance Summary

2014 - 2015 Stormwater BMP Compliance Summary

BMP ID	BMP Category	BMP Subcategory	BMP Description	2014-2015 Measurable Goal Milestone	2014-2015 Activities
A.1.1	Public Education and Outreach	Distribute Paper Material	Stormwater fact sheet and posters on Safety & Compliance Website	Post materials.	Maintained 3 fact sheets posted at S&C website.
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 (7/23/2014), Move In Edition (8/15/2014), Welcome Back Edition (8/22/2014) and Quad Day Edition (8/25/2014).
A.1.3	Public Education and Outreach	Distribute Paper Material	Stormwater Website	Continue updating website.	Maintained a stormwater website. URL is http://fs.illinois.edu/services/safety-and-compliance/about-the-program
A.2.2	Public Education and Outreach	Speaking Engagement	Information presentation or information booth.	Make one presentation or staff one booth.	Presented to Master Naturalists on Oct. 21, 2014.
A.3.1	Public Education and Outreach	Radio public service announcement	Public service announcement	Broadcast one PSA.	Facilities and Services posted multiple times on the Facebook page. Additionally, a 30-second audio PSA is available on the stormwater website.
A.4.1	Public Education and Outreach	Community Event	Biennial Green Infrastructure Conference	Plan next year's conference	The Illinois Green Infrastructure Conference that was to be held Sept. 9, 2015 was postponed due to funding and staffing shortages. The conference is expected to take place in Fall 2016.
B.1.1	Public Participation & Involvement	Public Panel	Create and conduct campus surveys	None	

2014 - 2015 Stormwater BMP Compliance Summary

BMP ID	BMP Category	BMP Subcategory	BMP Description	2014-2015 Measurable Goal Milestone	2014-2015 Activities
B.3.1	Public Participation & Involvement	Stakeholder Meeting	Meet with stakeholder group	Meet once.	Met with the Student Sustainability Committee Water Working Group on October 28, 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	Other Public Involvement	Sponsor one campus cleanup event annually.	Sponsor one campus cleanup event annually.	Sponsored Boneyard Creek Community Day (April 12, 2014) cleanup event and assisted with iHelp (October 18, 2014) cleanup event.
C.1.1	Illicit Discharge Detection and Elimination	Storm Sewer Map Preparation	Update GIS Storm Sewer System Map as changes occur.	Update GIS Storm Sewer System Map as changes occur.	The University has a GIS system map and is the process of validating it and adding additional functionality by including trace analysis. Further, the University is incorporating the Illicit Discharge Detection and Elimination Plan findings with this effort.
C.2.1	Illicit Discharge Detection and Elimination	Regulatory Control Program	Prohibit illegal discharges to storm sewer system	Prohibition in Campus Administrative Manual.	Discharge to storm sewers is restricted in the Campus Administrative Manual at V-b-3.1: Liquid Waste Disposal.
C.3.1	Illicit Discharge Detection and Elimination	Detection/Elimination Prioritization Plan	Investigate priority areas likely to have illicit discharges.	Investigate campus building drains. Develop dye test and drain labelling and/or repair list.	As part of the Illicit Discharge Detection and Elimination Plan, 1,422 interior drains were inspected. None of these drains were connected improperly. As part of an illicit discharge investigation in April 2014, the University found an repaired a broken sanitary sewer adjacent to a storm sewer.

2014 - 2015 Stormwater BMP Compliance Summary

BMP ID	BMP Category	BMP Subcategory	BMP Description	2014-2015 Measurable Goal Milestone	2014-2015 Activities
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 updated with the removal of one system and the installation of another system this year.
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 2014 Sanitary Sewer Annual Report submitted it to UCSD on February 17, 2015.
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.	One stormdrain mural was completed at Wright St. Drain markings were observed by volunteers during Boneyard Creek Community Day cleanup event. No markings were replaced during this event.
C.10.2	Illicit Discharge Detection and Elimination	Other Illicit Discharge Controls	Maintain construction standard requiring new storm sewer inlets to have storm water protection warning.	Include standard in bid documents.	The University Facility Standards for Storm Water Drainage Systems and Storm Sewerage Sections requires that all storm grates and curb inlets include a message similar to "Dump No Waste - Drains to River." The associated Standard Drawing includes the same message.

2014 - 2015 Stormwater BMP Compliance Summary

BMP ID	BMP Category	BMP Subcategory	BMP Description	2014-2015 Measurable Goal Milestone	2014-2015 Activities
C.10.3	Illicit Discharge Detection and Elimination	Other Illicit Discharge Controls	Publicize and encourage spill reporting procedures	Maintain spill response link and posters.	The University Spill Response information posters are located in F&S buildings and in a building next to Boneyard Creek. University spill response procedures are also on the Facility and Services, Safety and Compliance website. These provide guidance on what to look for and whom to contact.
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.	Annual Project Managers training was conducted on January 5, 2015.
D.2.3	Construction Site Runoff Control	Erosion and Sediment Control BMPs	Organize Stormwater Management Team (SWMT) to monitor compliance at construction sites	Meet annually to review project compliance.	Environmental Compliance met throughout the year with University Inspectors to discuss construction site runoff control (SWPPP review process, inspections, violations, training).
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.

2014 - 2015 Stormwater BMP Compliance Summary

BMP ID	BMP Category	BMP Subcategory	BMP Description	2014-2015 Measurable Goal Milestone	2014-2015 Activities
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 required SWPPPs and compliance with NPDES General Permit ILR10. The University has a Construction Site Enforcement Program and the procedures are incorporated into University Facility Standards.
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. Retain Notice of Non-compliance.	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	Review stormwater management policy and make recommendations for improvement.	No upgrade necessary.

2014 - 2015 Stormwater BMP Compliance Summary

BMP ID	BMP Category	BMP Subcategory	BMP Description	2014-2015 Measurable Goal Milestone	2014-2015 Activities
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.	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	Conduct walk-through for each development and redevelopment.	The Campus Horticulturalist reviews project documents and performs walkthroughs.
E.6.1	Post-Construction Runoff Control	Post-Construction Inspections	Inspect and maintain 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	Other Post-Construction Runoff Controls	Incorporate Low Impact Development elements where applicable into Utility Program Statements in the project review process.	Incorporate Low Impact Development elements where applicable into Utility Program Statements in the project review process.	This was done for 100% of applicable projects.

2014 - 2015 Stormwater BMP Compliance Summary

BMP ID	BMP Category	BMP Subcategory	BMP Description	2014-2015 Measurable Goal Milestone	2014-2015 Activities
F.1.1	Pollution Prevention/Good Housekeeping	Employee Training Program	Abbott Power Plant Facility Response Plan	Implement plan. Conduct training exercises.	<p>The University has a Facility Response Plan for Abbott Power Plant. An actual response to a deisel spill event that occurred on May 6, 2014 constituted the 2014 FRP exercise. The timely and effective response of the Spill Team prevented deisel fuel from entering the Boneyard Creek. The following entities were involved with the response:</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 Illinois Environmental Protection Agency Illinois Emergency Management Agency
F.1.2	Pollution Prevention/Good Housekeeping	Employee Training Program	Implement SPCC Plan	Implement and update SPCC Plan. Conduct annual training.	<p>In 2014, the University SPCC Coordinator held 4 training sessions for Unit Coordinators/Discharge Prevention Managers. The SPCC Coordinators, in turn, trained their oil handling employees. The University tracks oil storage containers on campus as required by 40 CFR 112 SPCC regulations.</p>

2014 - 2015 Stormwater BMP Compliance Summary

BMP ID	BMP Category	BMP Subcategory	BMP Description	2014-2015 Measurable Goal Milestone	2014-2015 Activities
F.1.3	Pollution Prevention/Good Housekeeping	Employee Training Program	Laboratory and Hazardous Material Training	Make training sessions available.	Chemical management training numbers are as follows: UIUC Chemical Waste Requirements Training = 914; General Laboratory Safety Training = 4,175; Chemical Management for Laboratories Part 1 = 912; Chemical Management for Laboratories Part 2 = 892; Chemical Management for Laboratories Part 3 = 885; Chemical Management for Laboratories Part 4 = 881; Chemical Management for Laboratories Part 5 = 880; Chemical Management for Laboratories Part 6 = 884; Hazard Communication Training (Right-To-Know) = 110; 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.

2014 - 2015 Stormwater BMP Compliance Summary

BMP ID	BMP Category	BMP Subcategory	BMP Description	2014-2015 Measurable Goal Milestone	2014-2015 Activities
F.2.1	Pollution Prevention/Good Housekeeping	Inspection and Maintenance Program	Maintenance and repair programs for campus car, truck and heavy equipment pools.	Document procedures.	The University has a written Vehicle Maintenance Program and conducts annual inspections of all car and heavy equipment pool vehicles. The inspection items include checking for oil and other fluid leaks. The University uses a checklist to document these inspections.
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 compliants have been made. There were 34 storm sewer Work Orders completed. These consisted of numerous storm sewer inlet repairs, cleaning clogged sewers, and the repair of the storm sewer at Kirby/Oak. Stormwater improvements were also made at Hazelwood Drive and Fourth Street in response to flooding.

2014 - 2015 Stormwater BMP Compliance Summary

BMP ID	BMP Category	BMP Subcategory	BMP Description	2014-2015 Measurable Goal Milestone	2014-2015 Activities
F.3.2	Pollution Prevention/Good Housekeeping	Municipal Operations Stormwater Control	Sanitary sewer system and catch basin inspection and cleaning program.	Inspect and clean system as necessary.	The University has a written Sanitary Sewer Maintenance Program. There were 30 sanitary sewer system repair Work Orders and 265 sanitary sewer system preventative maintenance Work Orders completed. These consisted of cleaning the sanitary sewers at the Illini Union, Orchard Downs, Freer Gym, McKinley Health Center, two residence halls, Memorial Stadium, and at two houses. Campus lifts stations and pumps were inspected daily, emergency generators were inspected monthly, and routine pump maintenance was performed.
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 236,000 pounds of hazardous waste.

2014 - 2015 Stormwater BMP Compliance Summary

BMP ID	BMP Category	BMP Subcategory	BMP Description	2014-2015 Measurable Goal Milestone	2014-2015 Activities
F.4.2	Pollution Prevention/Good Housekeeping	Municipal Operations Waste Disposal	Provide recycling service at the Waste Transfer and Material Recovery Facility. Contain waste materials under cover to avoid contact with storm water.	Provide recycling service to main campus. Contain waste materials under cover at all times.	The University has recycling available in over 225 campus buildings. As such, nearly 95% of the campus population has recycling available to them. Wash downs go to the sanitary system at the Waste Transfer Station. By the end of each working day, the University compacts all putrescible wastes into enclosed semi trailers. Other wastes that need to be covered or enclosed such as lead acid batteries are done so daily.
F.6.1	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Direct vehicle washing to sanitary sewer	Clean vehicles only at designated wash facility. Check and cleanout triple basin twice each year.	All vehicle washing took place in designated wash facilities. The University cleaned out the triple basin quarterly.
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.	Due to a staffing shortage and changes the Pesticide Use Policy was started but not completed this year. Staffing is expected to increase and this policy will be drafted next year. Grounds applied 1,005 pounds and 248 gallons of herbicide, 515 pounds of insecticide, and no fungicide. The University operated the Ground Pesticide Rinsate Facility in accordance with the Illinois Department of Agriculture Lawncare Containment.

2014 - 2015 Stormwater BMP Compliance Summary

BMP ID	BMP Category	BMP Subcategory	BMP Description	2014-2015 Measurable Goal Milestone	2014-2015 Activities
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 713 miles of University streets. The City of Urbana swept 407 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.
F.6.6	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Salt/Sand Use Policy.	Develop Salt/Sand Use Policy. Record amounts applied and describe current practices.	Due to a staffing shortage and changes this BMP was not developed. Staffing is expected to increase and this BMP will be developed next year.

2014 - 2015 Stormwater BMP Compliance Summary

BMP ID	BMP Category	BMP Subcategory	BMP Description	2014-2015 Measurable Goal Milestone	2014-2015 Activities
F.6.7	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Landscape Use Policy.	Draft Landscape Use Policy.	<p>The University transitioned this BMP from a drafting a new policy to including landscape use and maintenance in the Illinois Climate Action Plan (iCAP). The iCAP outlines a path for the University to achieve carbon neutrality by the year 2050. One of the major goals found in the iCAP is the development and implementation of a plan for sustainable landscapes and landscape maintenance practices on campus such as using native and perennial plants for less maintenance, decreased runoff and increased sequestration of pollutants. The iCAP is a living document with ongoing projects and updates coordinated by the Institute for Sustainability, Energy, and Environment.</p>

Attachment 3

2015 - 2016 Stormwater BMPs

2015 - 2016 Stormwater BMPs

BMP ID	BMP Category	BMP Subcategory	BMP Description	2015-2016 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.

2015 - 2016 Stormwater BMPs

BMP ID	BMP Category	BMP Subcategory	BMP Description	2015-2016 Measurable Goal Milestone
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.
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.10.2	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.

2015 - 2016 Stormwater BMPs

BMP ID	BMP Category	BMP Subcategory	BMP Description	2015-2016 Measurable Goal Milestone
C.10.3	Illicit Discharge Detection and Elimination	Other Illicit Discharge Controls	Publicize and encourage spill reporting procedures	Maintain spill response link and posters.
D.2.1	Construction Site Runoff Control	Erosion and Sediment Control BMPs	Pre-construction briefings for sites > 1 acre	Brief contractor and consultant before each applicable project.
D.2.2	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 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.

2015 - 2016 Stormwater BMPs

BMP ID	BMP Category	BMP Subcategory	BMP Description	2015-2016 Measurable Goal Milestone
D.6.1	Construction Site Runoff Control	Site Inspection & Enforcement Procedures	Enforce contractor requirements associated with NPDES ILR10 permit, SWPPP, and Facility Standards.	1) Issue contract for each applicable project that explicitly states requirements and enforcement procedures; 2) Enforce compliance according to Erosion and Sedimentation Control Enforcement Program
D.6.2	Construction Site Runoff Control	Site Inspection & Enforcement Procedures	Conduct construction site inspections.	1) Contractor inspect weekly and after 0.5 in rain 2) University inspect monthly
D.6.3	Construction Site Runoff Control	Site Inspection & Enforcement Procedures	Develop and implement procedures for handling reports of non-compliance	Implement Erosion and Sedimentation Control Enforcement Program. Retain Notice of Non-compliance.
E.2.1	Post-Construction Runoff Control	Regulatory Control Program	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.

2015 - 2016 Stormwater BMPs

BMP ID	BMP Category	BMP Subcategory	BMP Description	2015-2016 Measurable Goal Milestone
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.

2015 - 2016 Stormwater BMPs

BMP ID	BMP Category	BMP Subcategory	BMP Description	2015-2016 Measurable Goal Milestone
F.1.3	Pollution Prevention/Good Housekeeping	Employee Training Program	Laboratory and Hazardous Material Training	Make training sessions available.
F.1.4	Pollution Prevention/Good Housekeeping	Employee Training Program	Pesticide Application Training	Annually review licensing. Provide annual training for all employees who apply pesticides.
F.2.1	Pollution Prevention/Good Housekeeping	Inspection and Maintenance Program	Maintenance and repair programs for campus car, truck and heavy equipment pools.	Document procedures.

2015 - 2016 Stormwater BMPs

BMP ID	BMP Category	BMP Subcategory	BMP Description	2015-2016 Measurable Goal Milestone
F.3.1	Pollution Prevention/Good Housekeeping	Municipal Operations Stormwater Control	Storm sewer system and catch basin inspection and cleaning program.	Inspect and clean system as necessary.
F.3.2	Pollution Prevention/Good Housekeeping	Municipal Operations Stormwater Control	Sanitary sewer system and catch basin inspection and cleaning program.	Inspect and clean system as necessary.
F.4.1	Pollution Prevention/Good Housekeeping	Municipal Operations Waste Disposal	Hazardous waste management and pickup program.	Maintain and continue program. Record volume of waste picked up each year.

2015 - 2016 Stormwater BMPs

BMP ID	BMP Category	BMP Subcategory	BMP Description	2015-2016 Measurable Goal Milestone
F.4.2	Pollution Prevention/Good Housekeeping	Municipal Operations Waste Disposal	Provide recycling service at the Waste Transfer and Material Recovery Facility. Contain waste materials under cover to avoid contact with storm water.	Provide recycling service to main campus. Contain waste materials under cover at all times.
F.6.1	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Direct vehicle washing to sanitary sewer	Clean vehicles only at designated wash facility. Check and cleanout triple basin twice each year.
F.6.2	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Pesticide Use Policy	Record pesticide amounts applied. Operate Rinsate Facility in compliance with Illinois Department of Agriculture permit requirements.
F.6.3	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Street sweeping	Sweep campus streets at least monthly between April and October.

2015 - 2016 Stormwater BMPs

BMP ID	BMP Category	BMP Subcategory	BMP Description	2015-2016 Measurable Goal Milestone
F.6.4	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Parking deck cleaning	Sweep parking decks weekly and clean annually. Clean out triple basin when 1/3 full of sediment.
F.6.5	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Emergency response contractor continuing purchase order	Ensure that contractor is available 24 hours to assist with spill response.
F.6.6	Pollution Prevention/Good Housekeeping	Other Municipal Operations Controls	Salt/Sand Use Policy.	Develop Salt/Sand Use Policy. Record amounts applied and describe current practices.