

January 10, 2018

HAND DELIVERED

Nebraska Department of Environmental Quality
Wastewater Section
P.O. Box 98922
Lincoln, NE 68509-8922

Re: SMS4 Annual Progress Report
UNL City Campus and East Campus
IIS PCS 58075-P and 58076-P, NPDES, Permit NE0133892

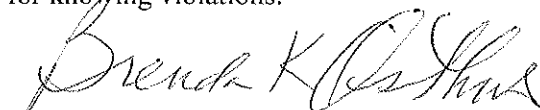
Dear Mesdames and Sirs:

Please find enclosed the Annual Progress report for the above referenced facilities. As per the permit, Part V., Section A, this Annual report covers the eleventh year of activities (January – December 2017). The attached documents summarize the information required, as listed in Part V, Section A of the permit.

If you would like additional information regarding this Annual report, please contact me at 402-472-4925.

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly involved in gathering the information, the information submitted is to the best of my knowledge and belief true, accurate and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Brenda K. Osthus, Director
Environmental Health & Safety

cc: Bill Nunez, Interim Vice Chancellor for Business and Finance

Encl.

Task Requirement	Basis of Requirement or Permit Condition	Due Date	Accomplishments
Baseline Wet Weather Monitoring.	Part IV, Section A	2008 and 2010	No requirements for 2017.
BMP Monitoring.		2009 and 2011	No requirements for 2017.
Record Keeping- Monitoring Information.	Part IV, Section B	Ongoing	In compliance.
Status of compliance with permit conditions and Storm Water Management Plan.	Part V, Section A.1	Annual	In compliance.
Description of progress towards achieving identified measurable goals for each of the minimum control measures.	Part V, Section A.2	Annual	In compliance. Description is provided within this table.
Results of information collected and analyzed, including monitoring data, if any, during the reporting period including wet weather monitoring results for years (2) and (4) and summary of fiscal expenditures.	Part V, Section A.3	Wet weather monitoring results 2008/2010 Annual fiscal expenditures	Complete. No baseline monitoring required for 2017. No BMP Monitoring required for 2017. \$ 125,264.33
Assessment of the appropriateness of identified BMPs toward reducing the discharge of pollutants to the Maximum Extent Practicable (MEP).	Part V, Section A.4	Annual Report 2008 and annually thereafter	In 2017, continued oversight revealed BMPs are appropriate and being implemented.

Summary of the stormwater activities planned for implementation during the next reporting cycle, including BMP Assessment Monitoring Plans for year 1 and 3 of the permit term.	Part V, Section A.5	Annual	In compliance. UNL submitted a new Stormwater Management Plan to NDEQ December 2017 which strengthens and further formalizes UNL's Minimum Control Measure commitments.
Changes or proposed changes in any identified BMPs or measurable goals for any of the minimum control measures.	Part V, Section A.6	Annual	UNL submitted a permit renewal application December 2017. Substantial changes to UNL's BMPs and measurable goals is contingent upon approval of the Stormwater Management Plan by the Agency.
Notice if UNL is relying on any other governmental entity to satisfy any of the permit requirements, and if so which ones.	Part V, Section A.7	Annual	In compliance. UNL is not relying on any other governmental entity to satisfy any of the permit requirements.
Immediate Notification-UNL shall report by telephone upon becoming aware of the following: 1) Evidence that a discharge or sludge may be causing distress to fish, aquatic life, plant life, wildlife, or livestock; and 2) Any new knowledge of spills, leaks or contamination that could impact authorized discharges to surface or groundwaters.	Part V, Section D	Annual	In compliance. No immediate notification was necessary in 2017.
Coordination of Information-UNL and NDEQ shall share and coordinate monitoring data where available.	Part V, Section E	Ongoing, all years.	In compliance. No monitoring data was generated during the reporting period to be shared between UNL and NDEQ.
Storm Water Management Plan	Appendix B		

<p>EHS will provide training opportunities and make information available to faculty and staff on pertinent topics such as illegal dumping, illicit discharges, vehicle maintenance, street maintenance, spill response, and proper management of wastes. EHS will also provide training and/or information to communities, business, schools, students, and individuals, upon request.</p>	<p>BMP 1.01</p>	<p>Ongoing, All years</p>	<p>In compliance. Approximately 2231 people received Stormwater Awareness training through new employee training. EHS provides information to faculty and staff via online SOPs.</p>
<p>UNL EHS will enhance our existing website with supplemental information materials regarding storm water and water quality.</p>	<p>BMP 1.02</p>	<p>Annual</p>	<p>Two additional links were added to the EHS website in regards to Stormwater in 2017. 6/29/17: NDOR Construction BMP Pocket Guide 11-28-17: Omaha Stormwater</p>
<p>UNL will participate in at least one public educational event per year by presenting relevant subject matter, or promote public education at a large venue event held on campus through pamphlet distribution, informational booth, banner, or similar mechanism.</p>	<p>BMP 1.03</p>	<p>Annual</p>	<p>In compliance.</p> <ul style="list-style-type: none"> - EHS staff hosted an informational booth at the New Graduate Student Welcome on August 17, 2017 and handed out approximately 56 pamphlets of the EPA pamphlet "<u>After the Storm: A Citizen's Guide to Understanding Stormwater</u>". - EHS staff worked with the Advertising/PR senior capstone class during the spring 2017 semester. Signage for Green Infrastructure was created by the students a booth was set up to discuss Low Impact Development on campus by utilizing their green infrastructure advertising campaign during the "Earth Stock" event held outside City Campus Union on 4/21/17. - UNL EHS gave a guest lecture on 2/8/17 for the Intro to Green Infrastructure class taught by Dr. Sutton and Dr. Rodie together at UNO and UNL.

<p>UNL EHS stormwater professional staff will present at least one major aspect of UNL's SWMP at a peer professional development activity/conference.</p>	<p>BMP 1.04</p>	<p>Once during the permit term</p>	<p>Complete. No new activity in reporting period.</p>
<p>UNL is governed by a publicly-elected board (Board of Regents). EHS will provide copies of the Annual Report to the highest ranking UNL business officer (the UNL Vice Chancellor for Business and Finance) and the Central Administration Director of Institutional Compliance.</p>	<p>BMP 2.01</p>	<p>Annual, each year of the permit term</p>	<p>In compliance. A copy of this 2017 annual report was provided to the Vice Chancellor for Business and Finance. The position of Central Administration Director of Institutional Compliance no longer exists.</p>
<p>EHS will solicit student environmental groups to participate in cleanup; or meet with EHS to discuss and provide input to UNL's stormwater management program.</p>	<p>BMP 2.02</p>	<p>Annual, each year of the permit term</p>	<p>In compliance. EHS made a presentation to the Association of Students of the University of Nebraska (ASUN) on November 29, 2017. On April 8, 2017 EHS sponsored students during the annual Big Event volunteer day in a creek clean-up of Antelope Creek and Dead Mans Run.</p>
<p>UNL will develop (in 2007) and maintain (annually) accurate storm sewer maps, including all outfalls and receiving waters of the state.</p>	<p>BMP 3.01</p>	<p>Annually, each year of the permit term</p>	<p>In compliance. Updated maps are included with this report.</p>
<p>EHS will conduct annual dry weather inspections of outfalls \geq 8 inches.</p>	<p>BMP 3.02</p>	<p>Annually, each year of the permit term</p>	<p>In compliance. IDDE dry weather inspections were completed. No illicit discharges were detected at time of inspection.</p>
<p>EHS will document and respond to telephone calls, emails, or other reports regarding illicit</p>	<p>BMP 3.03</p>	<p>Annually, each year of the permit term</p>	<p>In compliance. No reported illicit discharges in 2017.</p>

<p>discharge detection and complaints originating from UNL and forward complaints unrelated to UNL to the appropriate authority.</p>			<p>In compliance. No illicit discharges occurred in 2017, therefore no corrective action or sampling was necessary.</p>
<p>UNL will take steps to eliminate and/or reduce illicit discharges and dry weather discharges, particularly those that contribute to the TMDL of E.coli for Deadman's Run.</p>	<p>BMP 3.04</p>	<p>Annually, each year of the permit term</p>	<p>EHS updated the <i>Stormwater IDDE</i> SOP June 2017. Changes include: added information about the receiving waters for City and East Campus. Added information on reporting concerns related to permanent storm water controls. Added reference to the EHS on-line Stormwater Reporter tool. Updates were advertised in the UNL ListServ.</p>
<p>UNL will obtain NPDES construction permit for construction projects >1 acre. Contractors will submit SWPPP and NOI and comply with SWPPP. UNL Project Managers will ensure that contractors abide by these contract conditions.</p>	<p>BMP 4.01</p>	<p>Ongoing, all years</p>	<p>In 2017, construction NPDES contractors obtained permits for the following building projects: Cather Pound Demo, East Campus Parking Lot</p>
<p>UNL will develop and maintain procedures pertaining to construction site erosion and sediment control and construction site permitting requirements. EHS will provide annual training and education to UNL construction project managers.</p>	<p>BMP 4.02</p>	<p>Ongoing, all years</p>	<p>The following EHS SOP <i>Construction Site NPDES Permits</i> was updated July 2017 to reflect updated requirements of the new MS4 General Permit. Annual training and education was given to all UNL FMC Project Managers and Project Inspectors on 8-29-17, 8-30-17, 9-7-17. Topics discussed include: NPDES permit expectations, lessons learned, common mistakes, new MS4 general permit proposed changes and relevant Stormwater Management Plan commitments, new revisions to the UNL Design Guidelines to incorporate numerical standards for post-</p>

UNL construction project managers will monitor construction sites for compliance with SW Construction Permit requirements and report problems to the contractor with a request to remedy. EHS will maintain associate documentation of PM's notification to EHS and corrective actions taken.	BMP 4.03	Ongoing, all years	construction runoff control, and new e-Builder processes for review and approval of Erosion and Sediment Control Plans. In compliance. Project Managers and other UNL and EHS employees reported problems found from construction sites in 2017. These reports mainly consisted of post rain event soil erosion BMP maintenance and track out issues. These problems were followed up by EHS and corrected by the responsible party; none needed to be forwarded to a different appropriate authority.
EHS will conduct random stormwater compliance audits at construction sites > 1 acre.	BMP 4.04	Ongoing, all years	In compliance. Random inspections of the following sites were conducted by EHS: College of Business Administration, Vet Diagnostic Facility, UNMC Medical Center, East Campus Parking Lot
UNL will continue to implement and encourage the incorporation of permanent storm water BMPs through the <i>UNL Design Guidelines for Facility Construction</i> .	BMP 5.01	2007-2009	In 2017 UNL continued implementing requirements to incorporate permanent BMPs into new or significant redevelopment projects. On City or East Campus projects of ½ acre or greater must include post-construction controls for the first ½" of run-off from the site. No changes occurred to UNLs Design Guidelines. In 2017 UNL completed or initiated the following BMPs: <ol style="list-style-type: none"> 1. UNMC Health Center Sub Surface Detention System 2. Willa Cather Dining Complex Rain Gardens 3. Cather Garden turf infiltration 4. North Dental College Parking Lot bioretention basins/trenches 5. Library Depository turf bioretention 6. East Campus TES Tank Bioretention 7. East Campus Utility Plant infiltration trench 8. City Campus TES Tank detention basin

<p>UNL will implement a baseline wet-weather monitoring program. In addition, UNL will develop and implement a Best Management Practices wet-weather monitoring plan and program, which will include the East Campus Animal Science Pens, at a minimum.</p>	<p>BMP 5.02</p>	<p>Ongoing, all years</p>	<p>Complete. Required sampling ended in 2011.</p>
<p>UNL will continue to maintain streets, landscapes, and storm sewer systems in a manner that protects water resources; and evaluate opportunities for improvement.</p>	<p>BMP 6.01</p>	<p>2007* Note that metrics change in years 2-3 of the permit</p>	<p>In compliance.</p>
<p>UNL will conduct annual inspections of maintenance, landscaping, and other similar operations to ensure adherence to EHS guidance related to storm water management.</p>	<p>BMP 6.02</p>	<p>Ongoing, all years</p>	<p>In compliance. The following locations were inspected in 2016: City and East Campus Transportation Services; City and East Campus Utilities, Tractor Test Lab; City and East Campus Landscape Services; and East Campus Orchard House.</p>
<p>EHS will maintain chemicals, products, and wastes that would constitute pollutants, if released or exposed to precipitation in inside or covered storage; or will use fully-enclosed containers and/or distribution systems. These are required by EHS SOP and policy.</p>	<p>BMP 6.03</p>	<p>Annually, each year of the permit term</p>	<p>In compliance. EHS continued inspections of major chemical storage areas at the facilities listed in BMP 6.02 to verify protected storage. Inspections records are maintained and demonstrate substantial adherence to Safe Operating Procedures related to chemical storage and disposal.</p>
<p>Best management practices will be applied to East Campus</p>	<p>BMP 6.04</p>	<p>Ongoing, all years</p>	<p>In compliance. Random inspections occurred on 5-18-17 and 11-15-17.</p>

Animal Science Complex livestock operations.			
Best management practices will be applied to the East Campus Ray Bohy Arena livestock operations.	BMP 6.05	Ongoing, all years	In compliance. Random inspections occurred on 5-18-17 and 11-9-17.
UNL will continue to maintain a current Spill Prevention Control and Countermeasures (SPCC) plan along with all applicable documentation and training requirements.	BMP 6.06	Ongoing, all years	In compliance. UNL maintains SPCC plans at the following City and East Campus sites: Tractor Test, East Campus Utility Plant, City Campus Utility Plant, CREs, and East Stadium.