University of Nebraska-Lincoln

2019 Annual Report

NPDES Permit: NER 310000 (sMS4)

Requirement: MCM 1 Public Education		
Reference	BMP 1.01 Public Education (Part IV.B.1.a.1) 1. The permittee must develop and implement a comprehensive stormwater education and outreach program for the MS4. The SWMP must, at a minimum: a) Define the goals and objectives of the program based on defined high priority, community-wide issues; b) Define the target audience(s); c) Maintain and update appropriate messages for targeted residential, construction, industrial, and commercial issues; d) Define methods and process of distribution; e) Distribute appropriate educational materials and media to the target audience each year, using whichever methods and procedures determined appropriate by the permittee.	
Responsible	EHS: Environmental Specialist	
Strategy	(a) EHS will continue to publish and update storm water educational information on the EHS web site. (b) EHS will continue to include a storm water awareness message in general Injury and Illness Prevention Program (IIPP) training, which targets new employees and paid students. (c) EHS will continue to distribute storm water awareness information at gatherings specifically targeting new students. (d) EHS will continue to publish articles related to storm water in the EHS listserv. EHS will continue to collaborate with UNL Communications to publish information in Nebraska Today and Next@Nebraska on newly installed post-construction controls and UNL's SMS4 Permit and SWMP.	
Measurable Goals	**All Years:** 1. At least annually, review and update storm water educational information contained on EHS's web site. 2. At least annually, sponsor a storm water awareness booth at a large student event. 3. At least annually, publish a storm water awareness article in the EHS list serve. At least annually, submit a news article for publication in Nebraska Today and Next@Nebraska highlighting either newly installed post-construction structural controls or certain aspects of UNL's SWMP.	
Report	1. Date, nature of the large student event(s) with an EHS sponsored booth, estimated number of students that visited the booth, and summary of relevant	1. EHS sponsored a stormwater awareness booth at the following events in 2019; Lincoln Earth Day on April 27th, 2019 contacted

	information presented/distributed (during the prior year). 2. Date, summary of information distributed through EHS listserv, Nebraska Today, or Next@Nebraska 3. Summary of changes made to the EHS web site relative to available educational materials (during the prior year). 4. Number of persons completing an EHS training module that contains a storm water awareness message (during the prior year).	approximately 20-30 people; Supplier Showcase on May 15th, 2019 contacted approximately 180 students and faculty; Sunday with a Scientist on June 23rd, 2019 contacted approximately 375 adults and children; Graduate Fair Block Party on August 23rd, 2019 contacted approximately 250 mostly graduate students; Sustainability Block Party on September 27th, 2019 contacted approximately 30-40 people. At all events EHS Staff educated the public, students and staff by distributing written material and presenting information regarding UNL's SMS4 permit and the EHS on-line Stormwater Reporting tool. 2. EHS distributed education material in EHS Listserv a total of 3 times; "Be a Stormwater Steward" was about key management practices that reduce pollutants and was delivered on March 20, 2019, "Stormwater Dewatering" describes management practices to reduce pollution from dewatering was distributed on July 24, 2019, "The Power of Permeable Pavers" described the newly installed permeable pavers at the Devaney Gymnastics center and was distributed on November 6th, 2019. "Treating Stormwater at the Gymnastics Devaney Center" article intends to educate the public about the permeable pavers that are nearing completion at the Devaney Gymnastics Center and also contains information regarding the 2019 Annual Report. The article was submitted to Next@Nebraska and Nebraska Today on March 16th, 2020.

		3. In 2019, the following changes were made to the EHS Stormwater Management website: posting of the revised Runoff Control Plan; posting of the 2018 Annual report; posting of the newly developed Post-Construction Stormwater Control Review Form; posting of the revised SWMP. 4. During calendar year 2019, two thousand seven hundred twenty five (2725) people completed EHS Injury and Illness Prevention Training, which contains general stormwater awareness information. Additional Stormwater related training is described in MCM 3 and MCM 6.
Evaluation: Environmental Indicators of Effectiveness	N/A	
Requirement: MCM 2 Outreach and Involvement		
Reference	BMP 2.01 Outreach and Involvement (Part IV.B.1.a.2) 2. The permittee must provide a stormwater public involvement program that involves the public in the planning and implementation of programs and activities related to the development and implementation of the SWMP. At a minimum, the permittee must: a) Provide public notice of opportunities to review and comment on all new rules, ordinances, regulations and SWMP revisions drafted by the MS4; b) Create opportunities for citizens to participate in the implementation of storm water controls; and c) Ensure the public can easily find information about the permittee's SWMP.	
Responsible	EHS: Environmental Specialist	
Strategy	1. EHS will maintain the on-line Stormwater Pollution Reporter tool. 2. EHS will solicit feedback on UNL's SWMP and proposed revisions by: a. Adding language to the EHS web site asking for comments and suggestions from the campus community.	

	b. Soliciting comments and suggestions with announcements published in the EHS listserv. c. Soliciting comments and suggestions at meetings of the Chancellor's University Safety Committee, which has broad faculty and staff representation. d. Soliciting comments and suggestions by sending written notice to or attending a meeting of ASUN (Student Government) EHS will announce publication of its annual report and solicit feedback using the same mechanisms described above.	
Measurable Goals	**Year 1:** UNL's SMS4 permit and SWMP will be published on the EHS web site. Within one month of posting to the EHS web site, EHS will solicit feedback using the mechanisms described above. **All Years:** 1. EHS will solicit comment from the campus community of proposed significant changes to UNL's SWMP as described above. EHS will provide at least one month for receiving comments on proposed changes. All comments and EHS responses will be published to the EHS web site for a minimum of one month prior to finalizing any changes. 2. EHS will announce publication of its annual storm water report and solicit comment from the campus community as described above. EHS will respond to all comments in writing and maintain records of comments and responses for the duration of the permit term. These records will be made available to the campus community upon request. UNL's most current SMS4 permit and SWMP will be available on the EHS web site for public viewing throughout the permit term.	
Report	Summary of public notices, including date, content, and mechanisms of distribution. Documentation of all comments and responses will be available upon request.	1. In 2019, no significant changes were made to the SWMP. A link to submit comments on UNL's SWMP has been maintained throughout the year on the EHS website. To date no public comments have been received. 2. Solicitations for review and comment on UNL's 2018 Annual Report were made in 2019 as follows: An email was sent to ASUN Student Government on March 8th 2019; notice was given at the March 20th, 2019 meeting of the Chancellor's University Safety Committee; an article was published in the EHS Listserv on March 20th, 2019 for campus community review and

		comments. No comments or responses received. 3. UNL's SWMP was revised with minor changes and posted on the EHS website January 14th, 2020. NDEE's General permit and fact sheet were published upon notice of acceptance of UNL's SWMP in 2018 and remained unchanged in 2019.
Evaluation: Environmental Indicators of Effectiveness	N/A	

Requirement: MCM 3 Illicit Discharge Detection Elimination		
Reference	BMP 3.01 Enforcement Plan (Part IV.B.2.a.1.a) a. The permittee must, as part of the IDDE program, develop an enforcement plan or mechanism following the requirements of **Parts III.A** and **B** of this permit.	
Responsible	EHS: Environmental Specialist	
Strategy	EHS will continue to have and implement an Enforcement Response Plan	
Measurable Goals	**All Years:** The formal written Enforcement Plan will be implemented. The plan will be reviewed annually for needed modifications/updates.	
Report	EHS will report substantial changes made to the Enforcement Plan with each annual report.	UNL's current Enforcement Response Plan was reviewed in December, 2019. No circumstances occurred in calendar year 2019 that required implementation of the Enforcement Response Plan and based on the information in the Enforcement Response Plan Review it was determined that no significant changes are needed.
Evaluation: Environmental	N/A	

Indicators of Effectiveness		
Reference	BMP 3.02 Mapping (Part IV.B.2.a.1.b): The IDDE program must include or address: b. A storm sewer system map showing the location of all outfalls and the names and location of all waters of the state that receive discharges from those outfalls. If the SMS4 system connects to another MS4 system, the outfall drainage areas can be limited to those that drain only to the permittee's system. Connections and interactions to other MS4 systems need to be delineated;	
Responsible	Utilities: GIS Project Manager	
Strategy	The GIS Project Manager is informed of all projects that involve changes to the existing storm water system through the UNL construction management process.	
Measurable Goals	**All Years:** The GIS Project Manager will update the GIS system as changes are made to the storm sewer system to ensure that current information is readily available.	
Report	The GIS map will be available for review by the permitting authority upon request. No reporting.	No reporting required. The most current storm sewer system map showing the location of all outfalls and waters of the state that receive discharges is located on the EHS website and continuously updated within UNL's online GIS software.
Evaluation: Environmental Indicators of Effectiveness	N/A	
Reference	BMP 3.03 Dry-Weather Field Screening (Part IV.B.2.a.1.c): The IDDE program must include or address: c. Outfall field screening procedures and priority locations to investigate for detecting illicit discharges; I. The permittee must document written dry weather field screening and analytical monitoring procedures which are to be used at a number of outfall locations specified in the SWMP each year to detect discharges to the MS4; II. The screening procedures must identify the minimum staff, equipment, and discharge evaluation process used by the permittee; and	

	III. The permittee must document the basis for its selection of each priority location and maintain a current list of all priority locations identified in the system.	
Responsible	EHS: Environmental Specialist	
Strategy	1. EHS will continue to conduct dry weather inspections of all safely accessible UNL outfalls that are 8" or greater in size. Inspections will be conducted in accordance with the IDDE written procedures described in the introductory narrative of this MCM. A current map listing all qualifying outfalls will continue to be maintained, as described in BMP 3.02.	
Measurable Goals	**All Years:** EHS will inspect all safely accessible qualifying outfalls and maintain associated documentation. In addition, the storm sewer map will be updated to include newly installed qualifying outfalls as described in BMP 3.02.	
Report	1. Report percentage of qualifying outfalls for which a dry weather inspection was completed during the previous year. Report rationale/reason why any qualifying outlet was not inspected during the previous year. 2. Provide a summary of illicit discharges identified through dry weather monitoring during the prior year's inspections.	1. 100% of qualified outlets were inspected during calendar year 2019. 2. Corrective measures were implemented in 2019 for two outfalls identified in the 2018 dry weather inspection. One outfall had the sediment removed and sediment contributing inlet capped. The other outlet has a silt fence surrounding the inlet; however, upon closer inspection the sediment at the outfall location was believed to be from the surrounding bank and not from the adjacent agricultural field where the inlet and silt fence are located. In the 2019 dry weather inspections an illicit discharge was detected at one outfall and attributed to discharge of regeneration water from a mobile boiler. The discharge was re-directed to the sanitary sewer.
Evaluation: Environmental Indicators of Effectiveness	None	

Reference	BMP 3.04 Illicit Discharge Investigation and Response (Part IV.B.2.a.1.d & e): The IDDE program must include or address: d. Procedures, staff, and equipment required for investigating and tracing the source of all identified illicit discharge; (i) The permittee must report immediately the occurrence of any dry weather flows believed to be an immediate threat to human health or the environment to NDEE by calling (402) 471-2186 or (402) 471-4545 after business hours, weekends, and holidays; and (ii) The permittee must document all investigations to track at a minimum the date(s) the illicit discharge was observed; the results of the investigation; any follow-up of the investigation; and the date the investigation was closed. e. Procedures for removing the source of the discharge using the Enforcement Response Plan in **Part III.B**: (i) Once the source of the illicit discharge has been determined, the permittee must take immediate action so the responsible party of the problem can be notified, and require the responsible party to conduct all necessary corrective actions to eliminate the non-storm water discharge as soon as practicable; (ii) The permittee must document all interactions with potentially responsible parties as well as follow-up investigations to confirm illicit discharges have been removed.	
Responsible	EHS: Environmental Specialist	
Strategy	1. EHS will continue to investigate all identified and reported illicit discharges and conduct appropriate follow-up investigations and actions in accordance with UNL's IDDE written procedures (which include all regulatory requirements described in Part IV.B.2.a.1.d & e of the General Permit) and as described in the narrative for this MCM. EHS will implement its Enforcement Response Plan as described in BMP 3.01.	
Measurable Goals	**All Years:** EHS will take action to eliminate all identified illicit discharges to UNL's storm sewer system.	
Report	Summarize nature of each illicit discharge identified during the previous year and actions taken to eliminate the discharge.	During Calendar year 2019 there were six (6) potential illicit discharges reported/identified and all were investigated. • Four of the incidents were associated with uncontrolled concrete wash water. One report was from a concrete mixing station on a construction site that was lacking controls (E.C.

		Union); another report was from a contractor cleaning concrete tools at a job site (14th and Avery); another report was associated with discharge of dust control water from a coring machine used for research purposes (Walter Scott Engineering); another report was attributed to a contractor doing work nearby that dumped concrete residue into a nearby rocked area that migrated into a storm sewer where it was contained before being cleaned (C.C. Utility Plant). All four of these incidents were resolved and cleaned up in a timely manner. • As described in BMP 3.03, regeneration waster from a mobile boiler was detected during the annual dry weather IDDE inspections. • One report (Nebraska Hall Dock) involved a temporary roll-off that had construction demolition debris falling into a small drop inlet. The inlet was immediately cleaned up of debris and the dumpster was relocated away from the storm sewer until it was removed from the site.
Evaluation: Environmental Indicators of Effectiveness	Report any analytical data obtained to characterize illicit discharges detected during the previous year. Samples of potential illicit discharges were not collected in 2019, therefore there is no data to report.	
Reference	BMP 3.05 Non-Stormwater Discharges (Part IV.B.2.a.1.f): The IDDE program must include or address:	

	The following categories of non-storm water discharges or flows (i.e., illicit discharges) shall be addressed only if they are identified as significant contributors of pollutants to your SMS4: routine water line flushing, landscape irrigation, diverted stream flows, rising ground waters, uncontaminated ground water infiltration (as defined in 40 CFR 35.2005(20)), uncontaminated pumped ground water, discharges from potable water sources, foundation drains, air conditioning condensation, irrigation water, springs, water from crawl space pumps, footing drains, lawn watering, individual residential car washing, flows from riparian habitats and wetlands, dechlorinated swimming pool discharges, and street wash water (discharges from emergency firefighting activities are excluded from the effective prohibition against non-storm water and need only be addressed where they are identified as significant sources of pollutants to waters of the State of Nebraska). i. The permittee may also provide a list of other similar, occasional, and incidental non-storm water discharges that will not be addressed as illicit discharges (these incidental discharges are similar to those listed above in **Part IV.B. 2.e**). These non-storm water discharges must not be reasonably expected to be significant sources of pollutants to the MS4, because of either the nature of the discharges or conditions you have established for allowing these discharges to your MS4. ii. You must document in your SWMP any local controls or conditions placed on additional exempt non-storm water discharges. You must include a provision prohibiting any individual non-storm water discharges that is determined to be contributing significant amounts of pollutants to your MS4.	
Responsible	EHS: Environmental Specialist	
Strategy	**List of Additional Incidental Non-Stormwater Discharges:** Building flooding, recirculating water pump failures, other water line breaks, leaks, and overflows; drainage of sumps used to test water pumps, uncontaminated ground and storm water from foundation drains, utility vaults and tunnels; discharges from routine potable water line flushing, all of which are infrequent, occur in the event of emergency, or are necessary for proper maintenance and/or safety. **Local Controls:** All such discharges must be free of any sheen/film, color, turbidity, odors, or other unusual condition (e.g., off-gassing, foaming, etc.) and not likely to contain other pollutants.	
Measurable Goals	**All Years:** None.	
Report	Any changes to local controls.	No significant changes to local controls occurred in 2019. NDEE approved the following additions to the list of incidental non-stormwater discharges: uncontaminated ground and storm water from foundation drains, utility

		vaults and tunnels; discharges from routine potable water line flushing, all of which are infrequent, occur in the event of emergency, or are necessary for proper maintenance and/or safety.
Evaluation: Environmental Indicators of Effectiveness	Report all analytical sampling data generated from incidental discharges from the previous year, if analytical testing is conducted. Samples from incidental non-stormwater discharges were not collected in 2019, therefor there is no data to report.	
Reference	BMP 3.06 Adjacent MS4 Cooperation (Part IV.B.2.a.2&3) 2. If illicit connections or illicit discharges are observed related to an adjacent MS4 operator's municipal storm sewer system then the permittee must notify the other operator within 48 hours of discovery or as soon as practicable. 3. If another operator notifies the permittee of an illegal connection or illicit discharge to the municipal separate storm sewer system then the permittee must follow the requirements specified in **Part IV.B.2.a.1.b-d**.	
Responsible	EHS: Environmental Specialist	
Strategy	EHS will continue to maintain cooperative reporting and investigation practices with the City of Lincoln, as described in UNL's IDDE procedure.	
Measurable Goals	1. EHS will refer all suspected illicit discharges that originate up-gradient to UNL's SMS4 to the City of Lincoln within 48 hours of discovery. EHS will investigate all reports of suspected illicit discharges received from the City of Lincoln, in accordance with UNL's IDDE investigation procedures.	
Report	Summarize number and nature of reports forwarded to the City and received from the City, including actions taken to eliminate illicit discharges originating on UNL's property.	No reports of potential illicit discharges were reported to UNL by the City of Lincoln. No reports of potential illicit discharges were reported to the City of Lincoln by UNL.
Evaluation: Environmental Indicators of Effectiveness	N/A	
Reference	BMP 3.07 Public Reporting of Non-Storm Water Discharges and Spills (Part IV.B.a.2.b.1-3)	

	1) The permittee must promote, publicize, and facilitate public reporting of illicit discharges or water quality impacts associated with discharges into or from MS4s. 2) The permittee must develop a written spill/dumping response procedure, and a flow chart or phone tree, or similar list for internal use, that shows the procedures for responding to notification regarding illicit discharges, the various responsible agencies and their contacts, and who would be involved in illicit discharge incidence response, even if it is a different entity other than the permittee. 3) The permittee must conduct inspections in response to complaints and follow-up inspections as needed to ensure that corrective measures have been implemented by the responsible party to achieve and maintain compliance.	
Responsible	EHS: Environmental Specialist	
Strategy	1. EHS will continue to maintain the public reporting mechanism, Stormwater Reporter, on the EHS web page and promote reporting of potential illicit discharges by the campus community as part of the public education and outreach initiatives described in MCM 1 and 2. 2. UNL's IDDE procedure contains spill/dumping response procedures and contact information for various departments and agencies that may need to be notified. UNL's IDDE procedure addresses tracking, investigation, and follow up on all reports of illicit discharges.	
Measurable Goals	**All Years:** EHS will respond to all reports of potential illicit discharges and retain documentation of the nature of the complaint and EHS follow-up actions, as described in UNL's IDDE procedures.	
Report	1. Summary of public reports that EHS received during the prior year, nature of the discharge based on EHS investigation, and actions taken to eliminate the discharge. 2. Report substantial changes made to UNL's IDDE procedures.	1. Potential Illicit discharge investigations are summarized in the report for BMP 3.04. 2. No substantial changes were made to UNL's IDDE procedure. Minor changes to update the IDDE procedure are as follows: updates to reflect approved changes in the SWMP, minor word changes, and updated contact numbers.
Evaluation: Environmental	Report analytical results of water quality sampling conducted in response to illicit discharge investigations, if conducted.	

Indicators of Effectiveness	No analytical results of water quality sampling were conducted in response to illicit discharge investigations.	
Reference	BMP 3.08 Illicit Discharge Education and Training (Part IV.B.2.c) 1) The permittee must develop and implement a training program for all municipal field staff, which, as part of their normal job responsibilities, may come into contact with or otherwise observe an illicit discharge or illicit connection to the storm sewer system. Training program documents must be available for review by the permitting authority. 2) The SWMP must identify the frequency or implement a strategy for training staff identified in **Part IV.B.2.c.1** above on the identification of an illicit discharge or connection. The permittee must document and maintain records of the training provided and the staff trained.	
Responsible	EHS: Stormwater Specialist	
Strategy	1. EHS will implement a field staff illicit discharge detection training program. 2. Target Audience: appropriate employees that are beyond the scope of MCM 6 training, within EHS, Utilities, Landscape Services, and Building Maintenance Departments. 3. Annually, EHS will schedule a training session with each participating department to train employees who have not previously attended a training session (e.g., new hires). EHS will distribute refresher training materials on an annual basis to employees who have been previously trained. Refresher training format may be instructor-led, web-based, or through distribution of written materials. 4. EHS will maintain records of training to include: names, department and role/title of persons trained, dates of training, and summary of training materials.	
Measurable Goals	**Year One:** 1. Identify field staff that are required to participate in the training. 2. Deliver training to field staff. **All Subsequent Years:** 1. Design refresher training materials and distribute to previously trained staff. Deliver training to newly hired field staff.	
Report	1. Number of newly trained staff, by department. 2. Number of staff receiving refresher training, by department.	1. During calendar year 2019, EHS delivered initial stormwater awareness training to a total of fifty one (51) newly hired staff representing the following departments: Animal Science,

		Building Service Maintenance, Utilities, Nebraska Union, Facilities Planning and Construction, EHS, Housing, Landscape Services, Transportation Services, and Utility Services. This included in-person as well as online training modules. 2. During calendar year 2019, EHS designed and delivered stormwater awareness refresher training to a total of two hundred and thirty three (233) UNL staff representing the following departments: Animal Science, Athletics, Building Service Maintenance, Campus Recreation, EHS, Facilities Planning and Construction, Housing, Landscape, Nebraska Union, Transportation Services, and Utility Services.
Evaluation: Environmental Indicators of Effectiveness	N/A	

Requirement: MCM 4 Construction Site Runoff Control	
Reference	BMP 4.01 Enforcement (Part IV.B.3.b) The permittee must, as part of the construction requirements and control measures, develop an enforcement plan or mechanism following the requirements of **Parts III.A** and **B** of this permit
Responsible	EHS: Environmental Specialist
Strategy & Measurable Goals	See BMP 3.01. UNL's enforcement response plan addresses construction sites.
Report	See BMP 3.01

Evaluation: Environmental Indicators of Effectiveness	None
Reference	BMP 4.02 Site Plan Review and Approval (Part IV.B.3.c) The permittee must require each operator of a construction activity described in **Part IV.B.3.a** to prepare and submit for review an erosion and sediment control plan prior to the disturbance of land for the permittee's review and written authorization (operator must submit Part III.B.2 of the NDEE NPDES General Permit Number NER 160000 for Storm Water Discharges from Construction Sites to Waters of the State of Nebraska). The permittee must implement site plan review procedures that meet the following minimum requirements: 1) The permittee must not approve any erosion and sediment control plan unless it contains appropriate site-specific construction site control measures that meets the minimum local requirements for storm water protection of construction activity. 2) The permittee must use qualified individuals, knowledgeable in the technical review of erosion and sediment control plans to conduct such reviews. 3) The permittee must document its review of erosion and sediment control plan using a checklist or similar process. 4) The permittee must maintain an inventory that is continually updated of all active public and private construction sites authorized by the permittee within the MS4 boundary.
Responsible	EHS: Environmental Specialist
Strategy	As discussed in the narrative for this MCM, UNL General Specifications for construction require contractors to submit an Erosion and Sediment Control Plan (ESCP) for review and approval by EHS prior to commencing earth disturbing activities. At a minimum, EHS staff reviewing and approving ESCPs will have a bachelor's degree, one year related experience, and successfully completed a NDOT Erosion and Sediment Control Inspector course or equivalent. Reviews are conducted and documented in accordance with written procedures. A current inventory of permitted construction sites is maintained by EHS.
Measurable Goals	**All Years:**

	EHS will have reviewed and approved ESCPs for 100% of all construction sites subject to NDEE's Construction General Permit initiated during the previous year, and will have review documentation on file for every site.	
Report	Percentage of new construction sites subject to NPDES Construction General Permit requirements for which EHS reviewed and approved an erosion and sediment control plan during the prior year.	EHS reviewed and approved the Erosion and Sediment Control Plan for all (100%) construction sites subject to NDEE's construction general permit that were initiated in 2019. A total of three (3) Erosion and Sediment Control plans were approved in 2019. Projects included College of Engineering Link Building, Animal Science Complex Gnotobiotic Mouse Vivarium, and Inventory Building.
Evaluation: Environmental Indicators of Effectiveness	N/A	
Reference	BMP 4.03 Construction Site Inspection and Enforcement (Part IV.B.3.d) 1. The permittee must inspect public and private construction activity according to local procedures with a strategy documented in the SWMP. 2. The permittee must provide trained and qualified inspectors for municipal inspections. The permittee must also develop and implement written procedures outlining the local inspection and enforcement procedures. Inspections of construction sites must, at a minimum: (a) Check for coverage under the NDEE NPDES general construction permit by requesting a copy of any application or Notice of Intent (NOI) or other relevant application form during initial inspections; (b) Review the applicable erosion and sediment control plan and conduct a thorough site inspection to determine if control measures have been selected, installed, implemented, and maintained according to the plan; (c) Assess compliance with the permittee's ordinances and permits related to storm water runoff, including the implementation and maintenance of designated MCM; (d) Visually observe and record non-storm water discharges, potential illicit connections, potential discharge of pollutants in storm water runoff, and the receiving stream to determine if sediment has moved offsite; (e) Provide education and outreach on storm water pollution prevention, as needed; and (f) Provide a written or electronic inspection report generated from findings in the field.	

	3. The permittee must track the number of inspections for the inventoried construction sites throughout the reporting period. Inspection findings must be documented and maintained for review by the permitting authority. 4. Based on site inspection findings, the permittee must take all necessary follow-up actions (i.e., re-inspection, enforcement) to ensure compliance in accordance with the permittee's Enforcement Response Plan required in **Part III.B**. These follow-up and enforcement actions must be tracked and maintained for review by the permitting authority.	
Responsible	EHS: Environmental Specialist	
Strategy	Qualified EHS staff (as described in BMP 4.02) will inspect permitted construction sites at the following frequency: (a) At least 2 (two) times a year; (b) Upon report of a concern; (c) When needed to verify correction of deficiencies identified during a previous inspection. Inspections will be conducted in accordance with written procedures. Inspection reports will be documented and transmitted to the General Contractor and UNL Project Manager. Contractors will be required to submit a written response describing actions taken to correct deficiencies identified during the audit process. As necessary, EHS will implement UNL's Enforcement Response Plan to correct identified deficiencies.	
Measurable Goals	**All Years:** EHS staff will adhere to the described frequencies of inspection and existing written procedures for conducting construction site inspections, including record keeping, follow-up, and enforcement actions.	
Report	1. Percentage of permitted sites that EHS inspected at the targeted frequency. 2. Summary of substantial changes made to the written construction site inspection procedures during the prior year.	1. During 2019, all (100%) of the permitted construction sites were inspected by EHS at the targeted frequency described in the strategy. One construction site terminated their construction Stormwater Permit before a biannual inspection could be completed: Cather Pound (NOT was filed 06/18/19). No other construction sites terminated permits in 2019. The following permitted sites were inspected: Gymnastics Devaney (04/24/19, 10/23/19), Inventory Building (11/07/19), Gnotobiotic Mouse Vivarium (12/04/19).

		2. No substantial changes were made to the construction site inspection procedures in 2018. One minor change was approved by NDEE that allowed the removal of e-buider as the sole means of maintaining records.
Evaluation: Environmental Indicators of Effectiveness	NA	
Reference	BMP 4.04 Staff Training (Part IV.B.3.e) e. The permittee must ensure that the staff whose primary job duties are related to implementing the construction storm water program, including permitting, plan review, construction site inspections, and enforcement, are trained to conduct these activities. Training must be made available, sponsored, or required in a strategy established in the SWMP for erosion and sediment control/storm water inspectors, plan reviewers, and third-party inspectors and plan reviewers.	
Responsible	EHS: Environmental Specialist	
Strategy	At a minimum, assigned staff will have a bachelor's degree, one year related experience, and have successfully completed a NDOT Erosion and Sediment Control Inspector course or equivalent. In addition, assigned staff will review UNL's SWMP and review and adhere to associated written procedures.	
Measurable Goals	**All Years** EHS will maintain training records for all persons authorized to implement BMP 4.02 or 4.03.	
Report	Names of staff persons assigned responsibilities under BMP 4.02 and 4.03 and a summary of their qualifications.	The following individuals were assigned responsibilities under BMP 4.02 and 4.03 in 2019: Brenda Osthus, Patrick Boulas, Bruce Haley, and Nicholas Jenkins. See Appendix B for a summary of each person's qualifications. Each person meets or surpasses the minimum qualifications to conduct the activities defined in BMP 4.04.
Evaluation: Environmental	N/A	

Indicators of Effectiveness	
Reference	BMP 4.05 Construction Site Operator Education (Part IV.B.3.f.1) 1. The permittee must make publicly available educational materials to construction site operators in a strategy outlined in the SWMP. (a) The permittee must either provide information on existing training opportunities or develop new training for construction operators on control measure selection, installation, implementation, and maintenance as well as overall program compliance. (b) The permittee must develop or utilize existing outreach tools (i.e., brochures, posters, website, plan notes, manuals etc.) aimed at educating construction operators on installation, implementation and maintenance of storm water controls, as well as overall program compliance. (c) The permittee must make available appropriate outreach materials to all construction operators who will be disturbing land within the MS4 boundary. (d) The permittee must provide information on the installation and maintenance of controls on the permittee's website or made publically accessible by whichever methods and procedures are determined appropriate by the permittee and approved by the NDEE.
Responsible	EHS: Environmental Specialist
Strategy	1. EHS will continue to participate in pre-construction meetings with General Contractors to discuss their obligations under NDEE's NPDES Construction General Permit and UNL's SMS4 NPDES permit. EHS will provide instruction on where to access educational and informational materials. 2. EHS will make available existing stormwater manuals, brochures and other education materials aimed at education and outreach of construction best management practices on the EHS website and inform contractors of how to access information using various means, such as email communications, Contract Specifications, and verbal instruction. At present, this includes links to federal, state, and local agencies, as well as professional organizations. Information links include general awareness. 3. As part of the audits discussed in BMP 4.03 (construction site inspections), EHS will reference appropriate educational materials to assist contractors to correct identified deficiencies.
Measurable Goals	**All Years of the Permit:** 1. Annually, EHS will review/ enhance the materials made available for the purpose of General Contractor education and outreach.

	2. EHS will participate in a pre-construction meeting with every General Contractor for newly permitted sites.	
Report	1. Summary of changes made to educational and outreach materials related to construction best management practices. 2. Percentage of newly permitted sites where EHS held a pre-construction meeting with the General Contractor.	1. The following resources were added to the EHS website: Omaha Regional Stormwater Design Manuals; Erosion and Sediment Control, Stormwater Best Management Practices Part 1 and Part 2. 2. There were 3 newly permitted sites in 2019. EHS attended and presented outreach and education material to the general contractor for all three sites.
Evaluation: Environmental Indicators of Effectiveness	N/A	
Reference	BMP 4.06 Public Involvement (Part IV.B.3.f.2) Public Involvement – The permittee must have procedures for tracking complaints and submitting information by the public regarding construction projects and must also provide the permittee's response if a response is given.	
Responsible	EHS: Environmental Specialist	
Strategy	1. EHS will continue to maintain the public reporting mechanism, Stormwater Reporter, on the EHS web page and promote reporting of potential complaints by the campus community as part of the public education and outreach initiatives described in MCM 1 and 2. 2. EHS will track, investigate and follow up on all public complaints regarding construction projects, in accordance with UNL's written construction site inspection procedures discussed in BMP 4.03.	
Measurable Goals	**All Years:** 1. EHS will maintain our existing procedure for reporting suspected illicit discharges including specific concerns related to construction projects (http://ehs.unl.edu/sop/s-stormwater_IDDE.pdf). This procedure is publicly available on the EHS website.	

	2. EHS will respond to 100% of concerns reported by the public and retain documentation of the nature of the complaint and EHS follow-up actions (which will be summarized in the annual report). 3. EHS will maintain our on-line public reporting mechanism (*Stormwater Reporter*) on the EHS web page.	
Report	Summary of each complaint received and actions taken to resolve each complaint.	In 2019, no public concerns were received relative to permitted construction sites; however, one complaint was received by phone from a UNL employee regarding excessive dust during demolition of the College of Engineering Link Building. The EHS Specialist immediately contacted the UNL Project Manager and Responsible Contractor regarding the dust. The Contractor implemented enhanced dust control measures. A follow-up off site visit from the EHS Specialist the next day concluded that the dust was being controlled appropriately.
Evaluation: Environmental Indicators of Effectiveness	Report any water quality sampling done in response to public reporting. Not applicable.	

Requirement: MCM 5 Post Construction Management Program	
Reference	BMP 5.01 Site Performance Standards (Part IV.B.4.b) 1) Within the permit term, new permittees must adopt local post construction storm water standards for designing, installing, implementing, and maintaining storm water control measures which include BMPs that infiltrate, evapotranspire, harvest, and/or use storm water discharges. Existing permittees must review their current ordinances to ensure compliance with the permit in one year. 2) Within the permit term, new permittees must adopt local storm water discharge design standards that consider parameters such as site discharge volume, rate, duration, and frequency for new development and redevelopment sites. The local storm water discharge design standards must describe the site design strategies, control measures, and other practices deemed necessary by the permittee to protect pre-development hydrology to the maximum extent practicable. Existing permittees

	must review their current ordinances to ensure compliance with the permit in one year.	
Responsible	EHS: Environmental Specialist	
Strategy	EHS will identify and assemble a group of primary stakeholders (e.g., Facilities Planning and Construction, Environmental Health and Safety, Landscape Services, Utilities, Campus Planning, etc.) to review the current water quality and water quantity standards contained in the UNL Design Guidelines.	
Measurable Goals:	**Year One**: UNL will review existing performance standards to determine if changes are appropriate or necessary. **Ongoing All Years:** Maintain site performance standards	
Report	Report any changes to performance standards made during the preceding year.	Stakeholders met in September 2019 and reviewed UNL's Design Guidelines for water quality and quantity standards. No significant changes to the standards were made during the meeting. Minor design guideline changes included adding links to UNL's Stormwater Management website and posting online the UNL Post-Construction Stormwater Review Form. The Post-Construction Stormwater Review Form was created to promote consistent and accurate stormwater calculation submissions by architects/engineers.
Evaluation: Environmental Indicators of Effectiveness	NA	
Reference	BMP 5.02 Post-Construction Site Plan Review (Part IV.B.4.c.1.a) 1. To ensure that all applicable new development and redeveloped sites conform to the performance standards required in **Part IV.B.4.b** the permittee must conduct project review, approval, and enforcement procedures that include: (a) Procedures for the site plan review and approval process(es) and modification when changes to an approved plan are desired.	
Responsible	EHS: Environmental Specialist	

Strategy	1. EHS and FPC will continue to collaboratively review all designs for projects that are subject to UNL's storm water standards, including the stormwater calculations submitted by the Architect at the design phase. 2. Reviews will be documented in accordance with EHS's Internal Operating Procedure, *BMP 5.02 Post-Construction Plan Review and Approval*.	
Measurable Goals	**Ongoing All Years:** Conduct and document the site plan reviews for all (100%) of applicable construction projects.	
Report	**All Years:** 1. Percentage of applicable construction projects initiated in the prior year that were reviewed and approved.	All (100%) of the applicable construction projects initiated in 2019 were reviewed and approved. One construction project of 0.5 to < 1.0 acre was initiated in 2019. • C.Y. Thompson: Construction of a bioretention basin in the rear of the building that will meet the water quality and quantity goals of C.Y. Thompson and the adjacent Massengale parking lot and drive are in the planning stage. Four construction projects of 1.0 acre or greater were initiated in 2019. All (100%) of these projects were reviewed and approved. • College of Engineering: Phase I is part of a larger development construction project and accounts for the replacement of the existing link building. Phase II of the project is currently being planned and will include the exterior landscape of the buildings and is intended to encompass Phase I and Phase II water quality and quantity requirements. • Gnotobiotic Mouse Vivarium: Met or exceeded water quality and quantity goals.

		• Inventory Building: Met or exceeded water quality and quantity goals. • Mabel Lee: Met or exceeded water quality and quantity goals.
Evaluation: Environmental Indicators of Effectiveness	none	
Reference	BMP 5.03 As-Builts (Part IV.B.4.c.1.b) (b) A requirement for submittal of "as-built" certifications in a schedule defined in the SWMP and approved by the NDEE.	
Responsible	FPC: Project Manager EHS: Environmental Specialist	
Strategy	UNL Project Managers will ensure that As-Builts are submitted by the Architect, in accordance with existing contract provisions and as soon as feasible after substantial completion but no later than the end of the Contractor one-year warranty period. EHS will monitor construction documents to ensure that "As Builts" are on-file, and communicate deficiencies to the Project Manager as needed.	
Measurable Goals	**All Years of Permit:** 100% of applicable development sites will have relevant construction documents related to post-construction structural BMPs on file, including deviations from or modifications to approved designs.	
Report	**All Years of Permit:** Report percentage of applicable projects completed within the prior year for which complete as-built information is on file.	No applicable development sites that have relevant "As built" documents related to post-construction structural control BMPs were substantially completed in 2019; however, the Loop Road as built documents were amended to accurately reflect the post-construction structural BMP changes that were encountered during the construction project.
Evaluation: Environmental	none	

Indicators of Effectiveness		
Reference	BMP 5.04 Installation Inspections Part IV.B.4.d.1: 1) Procedures must be established to assure all structural storm water control measures installed and implemented meet the approved plans and are maintained in perpetuity.	
Responsible	FPC: Project Managers EHS: Environmental Specialist	
Strategy	1. Inspection of installation/implementation of storm water controls A/E Inspection: Existing UNL A/E Agreement provisions require periodic and final inspection by the Architect to ensure that all work conforms to Construction Documents. Issuance of a final certificate of completion is also contingent upon the Architects determination that the work complies with approved design parameters. 2. Maintained in perpetuity UNL Design Guidelines state: "Selected BMPs shall be specified in final design documents, and final construction documents shall contain schedules and procedures for inspection and maintenance of the BMPs." This schedule of maintenance activities will be uploaded into the appropriate department's (e.g., Landscape Services, Utility Services) work order system so that assets are maintained into perpetuity. Maintenance inspections are carried out through BMP 6.09	
Measurable Goals	**All Years:** 100% of all newly-constructed structural post-construction BMPs at sites subject to post-construction design criteria will be inspected by the A/E.	
Report	**All Years:** Percent of construction sites with new post-construction structural BMPs completed in the prior year that were inspected by the A/E and verified as meeting design criteria.	In 2019, there were no construction sites with post-construction structural BMPs that were substantially completed where inspections by the A/E were applicable; however, the Loop Road project was revisited after changes to the construction project were discovered. The changes still met the design criteria and were accepted by the A/E. The weirs and other stormwater pretreatment structures at the Nebraska Veterinary Diagnostic Center were reworked. Work to

		finalize and accept the bioretention basin will continue in 2020.
Evaluation: Environmental Indicators of Effectiveness	None	
Reference	BMP 5.05 Public Reporting (Part IV.B.4.d.2) 2) The permittee must establish procedures to respond to complaints and notifications to ensure the long-term maintenance of structural controls.	
Responsible	EHS: Environmental Specialist	
Strategy	EHS will track, investigate and follow up on all public complaints regarding post-construction BMP maintenance. Public reporting is encouraged through the mechanisms described in MCM 1 & 2.	
Measurable Goals	**All Years:** 1. EHS will continue to maintain the public reporting mechanism, Stormwater Reporter, on the EHS web page. 2. EHS will maintain our procedure for reporting suspected maintenance issues http://ehs.unl.edu/sop/s-stormwater_IDDE.pdf). This procedure is publically available on the EHS website. 3. EHS will respond to all public complaints and summarize the nature of each complaint and EHS follow-up actions in the annual report.	
Report	**All Years:** 1. Number and summary of complaints received and follow-up actions. 2. Summary of any changes to related procedures resulting from a complaint.	EHS did not receive any public complaints regarding post-construction BMP maintenance in calendar year 2019. No follow up actions or changes to procedures were applicable.
Evaluation: Environmental Indicators of Effectiveness	Report any water quality sampling done in response to public reporting. Not applicable	
Reference	BMP 5.06 Tracking Post-Construction Storm Water Control Measures (Part IV.B.4.e)	

	1. The permittee must maintain a current inventory of certified post-construction structural storm water control measures installed and implemented at new development and redeveloped sites, including both public and private sector sites located within the permit area. 2. A survey or number of new post-construction BMPs sorted by type (bio-retention, catch basins, etc.) must be included in the annual report. 3. Based on inspections conducted under **Part IV.B.4.f**, the permittee must update the inventory as appropriate where changes occur in property ownership or the specific control measures implemented at the site. This inventory must be maintained and available for review by the permitting authority.	
Responsible	EHS: Environmental Specialist Utilities: GIS Project Manager	
Strategy	New post-construction storm water controls at sites subject to UNL's Design Guidelines storm water standards will be inventoried and tracked using the campus GIS system, including details on the type of BMP.	
Measurable Goals	**All Years:** 100% of all post-construction structural BMPs subject to UNL Design Guidelines installed after the effective date of UNL's coverage under the SMS4 General NPDES permit are inventoried in UNL's GIS system, including details of type.	
Report	**All Years:** 1. Percentage of new development and redevelopment sites completed during the previous year for which permanent structural BMPs are inventoried in UNL's GIS system. 2. Number of post-construction permanent BMPs at new development and redevelopment sites completed during the previous year, sorted by type.	No new permanent structural BMPs were completed during 2019 from new development or redevelopment sites at UNL. An East Campus Recreation Center stormwater inspection confirmed 2 small rain gardens were part of the initial construction of the site and designed as structural stormwater BMPs. They were then returned to the inventory. The Loop Road construction site was amended to incorporate the changes experienced during construction. In anticipation of completion, two sites were added to UNL's GIS system (Inventory Building, Gymnastics addition to Devaney Center) however both sites were incomplete and have not had final inspections at the end of 2019.
Evaluation: Environmental	None	

Indicators of Effectiveness	

Requirement: MCM 6 Pollution Prevention and Good Housekeeping		
Reference	BMP 6.01 Mapping and Inventory (Part IV.B.5.a) a. Municipal Facility and Control Inventory 1) The permittee must develop and maintain an inventory of municipally-owned or operated facilities and storm water controls that is available for review by the permitting authority. 2) The permittee must identify on a map where the municipally-owned or operated facilities are located within the MS4. The map must be maintained and updated regularly and be available for review by the permitting authority.	
Responsible	Utility Services: GIS Project Manager	
Strategy	UNL's GIS Project Manager is informed of construction projects on the UNL campus and ensures that campus GIS maps are updated to reflect changes.	
Measurable Goals	**All Years**: Update maps as needed in response to campus changes.	
Report	The GIS map will be available for review by the permitting authority upon request. No reporting.	UNL GIS maps are up-to-date and available upon request.
Evaluation: Environmental Indicators of Effectiveness	N/A	
Reference	BMP 6.02 Municipally-Owned or Operated Facility Assessment (Part IV.B.5.b) 1) The permittee must maintain current assessments of all municipally-owned or operated facilities identified in Part IV.B.5.a. The strategy and description of the assessment procedure must be included in the annual report. 2) The permittee must identify "high-priority" facilities that have a high potential to generate storm water pollutants. High priority facilities are facilities which have the high potential to generate storm water pollutants. A description of the evaluation criteria for determining "high-priority" must be included in the annual report. 3) The permittee must document the results of the assessments and maintain copies of all site evaluation documents used to conduct the assessment.	

Responsible	EHS: Environmental Specialist	
Strategy	UNL's criteria for designating a facility as "high priority" is summarized in the narrative of this MCM, and documented in UNL's Runoff Control Plan. Final designation as "high priority" is based on known activities and final visual inspection of the site by EHS.	
Measurable Goals	**Ongoing all years**: UNL will conduct and document assessments as new facilities are built or established.	
Report	1. Changes to EHS's assessment strategy to identify "high priority" facilities made during the reporting period will be included in the annual report. 2. A list of newly identified "high priority" facilities made during the reporting period will be included in the annual report.	1. No changes were made to UNL's assessment strategy for designating "high priority" facilities in 2019; however, in February 2020, and with NDEE's approval, UNL's assessment strategy was amended to remove 28 UNL owned emergency generators from the list of high priority facilities since it is highly unlikely that a spill/release during refueling operations could reach and negatively impact a receiving water. Appendix C is an excerpt of the 2020 revised "Runoff Control Plan – High Risk Facility Assessment Designation". 2. A New Facility Assessment resulted in no new High Risk Facilities being added in 2019.
Evaluation: Environmental Indicators of Effectiveness	N/A	
Reference	BMP 6.03 Runoff Control Plans (Part IV.B.5.c) 1) The permittee must develop and maintain facility-specific Runoff Control Plans for "high priority" facilities to control the contribution of pollution in storm water runoff. (a) For each "high priority" facility or operation identified in **Part IV.B.5.b**, the permittee must develop or maintain a site-specific RCP that identifies storm water control measures, inspection strategy, and visual monitoring procedures.	

	(b) A copy of the facility-specific Runoff Control Plan must be maintained and be available for review by the permitting authority. The RCP must be kept on-site at each of the municipally owned or operated facilities' offices for which it was completed. The RCP must be updated as necessary. 2) All "high priority" municipally-owned or operated facility Runoff Control Plans must include provisions for general good housekeeping practices, storage of de-icing materials, fueling operations, vehicle maintenance, and equipment and vehicle washing.	
Responsible	EHS: Environmental Specialist	
Strategy	UNL has developed a written Runoff Control Plan that covers all high priority facilities at UNL. A copy of this plan will be on file at each location.	
Measurable Goals	**Year One:** EHS will ensure that a copy of UNL's RCP is on file at each high priority facility. **All Subsequent Years:** EHS will review the RCP for needed changes and place a copy of the plan at newly identified high priority facilities as they are built or established.	
Report	**Year One**: Percentage of high priority facilities that have a RCP on file at their location. **All Subsequent Years**: Summary of newly built or established high priority facilities during the previous year and changes made to the RCP related to newly identified facilities.	UNL's Runoff Control Plan was distributed to the managers of all (100%) of the High Risk Facilities at UNL City and East Campus in Year 1. No New High Risk Facilities were identified at UNL in 2019. EHS inspected every high risk facility for adherence to the UNL Runoff Control Plan and other good housekeeping/pollution prevention measures in 2019. Copies of inspection records are on file.
Evaluation: Environmental Indicators of Effectiveness	N/A	
Reference	BMP 6.04 Inlet Maintenance (Part IV.B.5.d.1.a&e) 1) MS4 storm water inlets and catch basin maintenance (a)The permittee must develop a strategy to inspect and clean storm water inlets as needed in the SWMP. The results of the implementation of this strategy shall be included in the annual report. (e) The permittee must develop a procedure to dewater and dispose of materials	

	extracted from catch basins so that water removed during the catch basin cleaning process and waste material will not reenter the MS4.	
Responsible	Utilities Services: Utility Plant Manager EHS: Environmental Specialist	
Strategy	Utilities Services and/or EHS staff will inspect and clean UNL owned inlets and catch basins under the following strategy: 1. Catch basins will be inspected annually and cleaned as needed. 2. Inlets within 100' down gradient from construction sites 1 acre or greater in size will be inspected and cleaned as necessary prior to filing of a NOT for the site and following substantial stabilization of the site. 3. Inlets specifically associated with an illicit discharge during the previous year will be inspected the subsequent year to verify that the condition leading to the illicit discharge no longer exists. 4. Inlets that have required maintenance during the previous year for clogging or other discharge malfunction will be inspected during the subsequent year to verify that the conditions leading to the malfunction no longer exist. In collaboration with UNL's Utilities Department, EHS will establish a written procedure for inspection and cleaning of inlets and basins and inspectors will be trained to the SOP. The SOP will include evaluation of physical condition; indicators of pollutants (trash, debris, sanitary sewage, oil sheen, discoloration, etc); and management of recovered debris/material.	
Measurable Goals	**Year one:** Establish an inventory of all inlets and basins requiring inspection. Establish the inlet inspection and maintenance procedure and train applicable staff. Verify that inspection and maintenance activities are captured in the appropriate Department's work order system, or otherwise documented. **All Years of Permit:** Update the inventory of inlets and basis requiring inspection as needed; document inspection of each.	
Report	**All Years of Permit:** 1. Percentage of inlets/basins scheduled for inspection with completed inspections. 2. Number of basins/inlets inspected where corrective action was needed and a summary of actions taken.	1. UNL Utility Services has not identified any underground structures on City or East Campus that would be classified as a catch basin. Utility Services will continue to monitor newly installed structures and inventory any that are classified as a catch basin for future inspection. All (100%) of inlets 100' down gradient of construction sites that have filed NOTs in 2019 as well as all inlets associated with an illicit discharge in 2018 have

		been inspected by EHS in 2019. Also in 2019, Utilities Services has inspected all (100%) inlets that reported issues in 2018. 2. In 2019, none of the inlets that were inspected as part of this BMP required corrective action. No action was deemed necessary.
Evaluation: Environmental Indicators of Effectiveness	Report any analytical testing done in response to inlet clean-outs No analytical testing was conducted.	
Reference	BMP 6.05 Inlet Awareness Labels (Part IV.B.5.d.1.b) b. The permittee must have a plan to label inlets with a legible storm water awareness message.	
Responsible	EHS: Environmental Specialist Utilities: Utility Plant Manager	
Strategy	EHS will meet with the campus stakeholder group (described in MCM 3 & 5) to evaluate/determine: a) Current design guidelines regarding inlet labels and address any changes deemed necessary to be applied to future projects. Criteria for identifying existing, un-labeled, high-priority inlets and identifying funding sources and timelines for retrofitting these with inlet awareness labels/messages.	
Measurable Goals	**Year One:** a) Establish acceptable means and methods for future inlet labeling and update UNL's Design Guidelines accordingly. b) Establish criteria for designating existing "high risk" inlets. Inventory existing "high risk" inlets and establish a funding source and schedule for labeling. **All Subsequent Years**: Label drains as applicable by Design Guidelines or high priority inlet schedule.	
Report	**Year One**: Provide a summary of inlet labeling design guidelines, and criteria	In 2019, Inlet awareness labels were installed on all applicable inlets that were discussed in the 2018 stormwater

	used to identify existing high-priority inlets. **Subsequent Years**: Provide a summary of changes made to the design guidelines, and status of progress in labeling of existing high-priority inlets.	stakeholders meeting. The design guidelines for UNL reference City of Lincoln design criteria for installation of inlet awareness labels for new construction. There were four locations that were identified in 2019 stormwater stakeholders meeting: T Street, Lot 3, Campion's Club Parking, and Stadium Drive. All locations were chosen due to high foot traffic from students and during football games. EHS will identify, fund, and install awareness labels on inlet curbs and grates within these locations that do not already have awareness labels in 2020.
Evaluation: Environmental Indicators of Effectiveness		
Reference	BMP 6.06 Open Drainage Maintenance (Part IV.B.5.d.1.c-d) (c) The permittee must visually monitor permittee-owned open channels and other drainage structures for debris and evidence of ongoing dumping in a strategy defined in the SWMP. (d) The permittee shall include a plan for the removal of trash and debris from open channels and other drainage structures. The plan shall be detailed in the SWMP and approved by the NDEE. The permittee must document drainage structure maintenance activity in a log that is to be made available for review by the permitting authority upon request.	
Responsible	Landscape Services: Assistant Director, Landscape Operations EHS: Environmental Specialist	
Strategy	Landscape Services will visually monitor all safely accessible UNL owned open channels annually for debris and structural integrity. All waste material will be containerized and disposed of as refuse at a permitted municipal waste landfill, unless meeting criteria of regulated waste, then disposed via EHS in accordance with local, state, and federal rules and regulations as applicable. Any structural maintenance activity will be logged or forwarded to the appropriate agency, if not within the responsibility/authority of UNL.	

	All inspection records will be maintained.	
Measurable Goals	**All Years:** Inspect open drainage channels annually, and maintain a log of associated maintenance activity.	
Report	**All Years**: Percentage of scheduled vs. completed inspections.	All (100%) of UNL owned/maintained open channels on City, East and Innovation campus were inspected in 2019.
Evaluation: Environmental Indicators of Effectiveness	Report any analytical results taken No analytical samples were taken	
Reference	BMP 6.07 Municipal Activities and Operations (Part IV.B.5.d.2) (a) The permittee must implement a set of pollution prevention measures that, when applied during municipal O&M activities, will reduce the discharge of pollutants in storm water. (b) All pollution prevention measures implemented at municipal facilities must be visually inspected in a strategy defined in the SWMP to ensure they are working properly; a log of inspections must be maintained and made available for review by the permitting authority upon request.	
Responsible	EHS: Environmental Specialist	
Strategy	Groups of employees that work within O&M at UNL such as plumbers, painters, certified pesticide applicators, etc., not previously identified under a Runoff Control Plan, that could potentially impact stormwater during the course of their work activities will follow pollution prevention measures to prevent negative impacts to stormwater. These pollution prevention measures are detailed in UNL's RCP and the employees subject to this BMP will receive training on UNL's RCP. EHS will interview O&M facility leadership annually to ensure that they are adhering to pollution prevention measures and maintain associated documentation.	
Measurable Goals	**Year One:** EHS will identify and train groups of affected employees. **All Subsequent Years:** 1. EHS will interview O&M facility leadership groups annually. 2. EHS will review UNL's RCP annually, and update as needed. EHS will distribute refresher training materials annually to affected employees, and refresher training will include any changes made to UNL's RCP.	

Report	1. List of O&M facility leadership groups interviewed, and groups of employees receiving training. 2. Significant changes to UNL's RCP.	1. The following departments' facility leadership was interviewed to ensure they adhere to pollution prevention measures: Building Systems Maintenance, Campus Recreation, Nebraska Union, Facilities Planning and Construction, Athletics, and Housing. All applicable employees at these departments received respective initial or refresher training to the Runoff Control Plan in 2019.For a complete list of departments trained in 2019 refer to BMP 3.08. 2. No significant changes to the Runoff Control Plan occurred in 2019; however, changes to the plan did occur in early 2020. Updates will be sent out as refresher material throughout 2020. Significant changes included adding a section in the general pollution prevention and good housekeeping section about refueling emergency generators, updated emergency generator assessment criteria, removing emergency generator locations no longer believed to be a high potential to pollute a receiving body, and updated good housekeeping measures to include the new silage bag location at the Animal Science high risk facility.
Evaluation: Environmental Indicators of Effectiveness	N/A	

Reference	BMP 6.08 Street Sweeping (Part IV.5.d.3) (a) The permittee must sweep municipally-owned and maintained streets, roads, and public parking lots in accordance with a strategy defined in the SWMP. (b) The permittee must provide a procedure to dewater and dispose of street sweeper waste material. This procedure must ensure that water and material will not reenter the MS4.	
Responsible	Landscape Services: Assistant Director of Landscape Operations Parking Services: Director	
Strategy	Landscape Services will sweep UNL owned streets and surface parking lots annually in the spring. UNL street sweepers do not utilize liquid in the operation. Streets and surface lots are visually monitored throughout the rest of the year and cleaned as needed. All waste material from street sweepers are collected at a designated area at City and East Campus Landscape Services where it is not able to reenter the MS4 system and then properly disposed at a permitted municipal waste landfill. Parking Services cleans all parking garages annually in the summer, with steamer equipment that recovers all liquid. Recovered liquid is disposed in the sanitary sewer. Filtered sediment is collected and accumulated in a manner not exposed to precipitation and disposed of at a permitted municipal waste landfill.	
Measurable Goals	**All Years:** Clean streets and parking lots at frequency defined.	
Report	Summarize any changes to schedule or means of disposal.	No changes were made to the schedule or means of disposal for waste material generated from street sweeping or garage cleaning. Open parking lots and streets were swept/cleaned at the targeted frequency. Parking garages were cleaned in the summer of 2019 using a brush sweeper. The steamer equipment was not used in the parking garages for 2019 due to continued staffing issues.
Evaluation: Environmental Indicators of Effectiveness	None	

Reference	BMP 6.09 Maintenance of Municipally-Owned and/or Maintained Structural Storm Water Controls (Part IV.5.d.4) (a) The permittee must inspect and maintain if necessary municipally-owned or maintained structural storm water controls in accordance with a frequency provided in the SWMP. (b) The permittee must also maintain municipally-owned or maintained green infrastructure practices through regularly scheduled maintenance activities.	
Responsible	Utilities Service: Utility Plant Manager Landscape Services: Assistant Director of Landscape Operations EHS: Environmental Specialist	
Strategy	(a) Utility Services will inspect and perform maintenance, if necessary, on all underground stormwater structural controls at least annually or at a frequency recommended by the manufacturer for proprietary systems. Landscape Services will inspect all above ground green infrastructure and structural storm water controls at least annually.	
Measurable Goals	**All Years:** All structural and green infrastructure controls will be inspected and maintained at the required frequency.	
Report	Percentage of Preventative Maintenance inspections conducted on stormwater controls.	All (100%) UNL post-construction stormwater controls inventoried in BMP 5.06 were inspected by EHS or Landscape Services in 2019.
Evaluation: Environmental Indicators of Effectiveness		
Reference	BMP 6.10 Training and Education (Part IV.5.e) The permittee must develop and implement an employee training program for employees involved in implementing pollution prevention and good housekeeping practices in this part. The permittee must also identify and track all personnel requiring training and records must be maintained. The training program and target audience must be described in the SWMP.	
Responsible	EHS: Environmental Specialist	

Strategy	EHS will implement its RCP training programs and include affected employees of "high risk" facilities, as well as O&M employees described in BMP 6.07. In collaboration with management of these departments/facilities, EHS will specifically identify affected employees and update the roster of affected employees annually. Affected employees will receive full RCP training once, and will be provided with refresher training materials annually. EHS will maintain training records for individual employees and records of the materials used for initial and refresher training.	
Measurable Goals	**Year One**: EHS will identify and deliver training to affected employees. **All Subsequent Years**: 1. EHS will update the roster of affected employees at least annually, and deliver full RCP training to newly identified affected employees. 2. Refresher training materials will be provided to previously trained employees at least annually. 3. EHS will review training materials at least annually and update as needed. EHS will maintain records indicating the names of employees receiving training, a summary of the content of the training, date of training, and name of the person conducting the training or other method of delivery.	
Report	**Year One**: Status of completion of training materials. **All Subsequent Years**: Number of employees, by department, completing training during the reporting period.	As reported for BMP 3.08, two hundred eighty four (284) UNL staff received initial or refresher training in 2019 and represented the following departments: Building Systems Maintenance, Utilities Services, Landscape Services, EHS, Animal Science, Athletics, Campus Recreation, Nebraska Unions, Facilities Planning and Construction, Housing, and Transportation. This included "field staff' and employees at "high risk facilities".
Evaluation: Environmental Indicators of Effectiveness		
Reference	BMP 6.11 Contractor Requirements and Oversight (Part IV.5.f) Any contractors hired by the permittee to perform municipal maintenance activities	

	that have the potential to impact storm water quality must be contractually required and overseen by the permittee to ensure compliance with all of the storm water control measures, good housekeeping practices, and facility-specific Runoff Control Plans described above. The contract must also state who is responsible for overall management and implementation of your pollution prevention/good housekeeping program and, if different, who is responsible for each of the BMPs identified for this program.	
Responsible	Leadership of the UNL department issuing the contract for work by the contactor	
Strategy	UNL includes language in contracts for municipal maintenance activities obligating contractors to comply with storm water control measures, good housekeeping practices, and runoff control plans. UNL employees are instructed to notify EHS of any condition that is or could result in an illicit discharge.	
Measurable Goals	No illicit discharges will occur related to municipal maintenance activities conducted by outside contractors.	
Report	Summary of nature of all illicit discharges attributed to municipal maintenance activities conducted by outside contractors during the reporting period.	No illicit discharges associated with municipal maintenance activities conducted by an outside contractor were reported or discovered by EHS during calendar year 2019.
Evaluation: Environmental Indicators of Effectiveness	None	

Appendix A – Documentation of Amendments

The University of Nebraska – Lincoln (UNL) Stormwater Management Plan (SWMP) was reviewed by the UNL Environmental Health and Safety Department (EHS) in March, 2020. The amendments to the SWMP are changes to the remedy of the original SWMP approved through public comment and NDEE review on June 29th, 2018. The changes herein were considered minor/not significant as they improved clarity, removed redundancy, released unnecessarily restrictive content, and did not change any measurable goals contained within the originally identified SWMP. EHS communicated changes and sought approval with NDEE before the amended SWMP was released. Letters from NDEE approving the amendments are attached to this appendix. No public comment was deemed necessary for the minor/ not significant changes that amended the originally identified SWMP. The following are the notable minor/not significant amendments in this respect:

1) *BMP 5.07 Post-Construction Storm Water Inspection and Enforcement* – BMP 5.07 was removed from the SWMP as it was redundant to BMP 5.04. This was mutually agreed upon between UNL and NDEE. For supporting documentation reference the letter received from NDEE on August 19th 2019 titled, "*2018 MS4 Annual Report Review for University of Nebraska – Lincoln*".
2) *BMP 3.05 Non-Stormwater Discharges* – BMP 3.05 was amended to include additional incidental non-stormwater discharges. Uncontaminated groundwater from foundation drains, utility vaults and tunnels, discharges from potable water sources, and routine water line flushing. All of the non-stormwater discharges described in this BMP are infrequent. Additionally, the discharges are not reasonably expected to be significant contributors of pollution due to the nature of the discharge. For supporting documentation reference the email received from NDEE on November 13th, 2019 titled, "*UNL Proposed SWMP Amendments*".
3) *BMP 5.02 Post-Construction site plan review* – BMP 5.02 was amended to reflect that post-construction site plan reviews will be documented in accordance with the respective EHS internal operating procedure and not explicitly in UNL's current construction tracking/recordkeeping system(s). This amendment alleviates the requirement to use the construction tracking/recordkeeping system(s), which was found to be overly restrictive. Under no condition does this amendment alter or mitigate any recordkeeping associated with conducting construction site plan reviews. For supporting documentation reference the email received from NDEE on November 13th, 2019 titled, "*UNL Proposed SWMP Amendments*".
4) *BMP 4.05 Construction site operator education* – BMP 4.05 was amended to replace E-builder (UNL's construction tracking/recordkeeping system) with email. This amendment is concurrent with removing the requirement to use the construction tracking/recordkeeping system(s), which was found to be overly restrictive. Under no condition does this amendment alter or mitigate any recordkeeping associated with conducting construction site operator education. For supporting documentation reference the email received from NDEE on November 13th, 2019 titled, "*UNL Proposed SWMP Amendments*".
5) 5) *Minimum Control Measure 6* – Emergency generator locations were removed from the MCM 6 narrative after an assessment of all previously identified high priority generators concluded that it is highly unlikely a spill/release during refueling operations would impact a receiving water body. For supporting documentation reference the email received from NDEE on February 7th, 2020 titled, "Proposed UNL Stormwater Management Plan Minor Modification". Additionally, Ray Bohy arena was removed from the narrative of MCM 6 as it is no longer considered a high priority facility after the protocol authorizing animals from the site was redacted on November, 14th 2018 and the animals have been removed from the site.
6) *BMP 6.07 Municipal Activities and Operations* – BMP 6.07 was amended to replace the language "inspecting affected O&M groups annually" with "interviewing O&M facility leadership annually". The current language is redundant to visual inspections of control measures already occurring in a strategy identified in the SWMP through BMP 6.03 and the Runoff Control Plan supporting document. Many of the control measures performed by O&M staff are administrative in nature where a visual site inspection would be unbecoming. The adherence

of O&M groups to institutionally bound stormwater control measures should be managed directly by facility leadership. EHS Staff should be responsible for interviewing the facility leadership for adherence to the control measures of the O&M group employees. For supporting documentation reference the email received from NDEE on March 19th, 2019 titled, “Proposed Minor Change”.

NEBRASKA

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DEPT. OF ENVIRONMENT AND ENERGY

RECV'D

AUG 19 2019

AUG 09 2019

Pete Ricketts, Governor

Brenda Osthus
University of Nebraska – Lincoln
3630 East Campus Loop
Lincoln, NE 68588

RE: **2018 MS4 Annual Report Review for University of Nebraska – Lincoln**
NDEQ ID: **58075 & 58076**
PROGRAM ID: **NER310012**

Dear Ms. Osthus,

Nebraska Department of Environment and Energy (NDEE) has completed its review of the University of Nebraska – Lincoln's 2018 MS4 Annual Report for compliance with Part VI.A. of the small MS4 permit (General NPDES Permit Number NER310000 Authorizing Storm Water Discharges to Waters of the State from Small Municipal Separate Storm Sewer Systems Located in the State of Nebraska). Based on the information provided, the Department has determined the submitted annual report meets the reporting requirements of the small MS4 permit. It was noted that UNL did not complete all year one commitments in 2018, as the SWMP was approved by the Department on June 29, 2018. The Department will continue to monitor UNL's progress towards satisfying these commitments.

The Annual Report states that BMP 5.07 will be removed from UNL's SWMP, as it is redundant to BMP 5.04. The Department agrees to the removal of BMP 5.07 in accordance with the requirements of Part VII.A. of General Permit NER310000. The SWMP does not need to be public noticed, as this modification does not change any measurable goals.

If you have any questions or need additional information, please contact Ryan Joe at (402) 471-8330 or ryan.joe@nebraska.gov.

Thank you,

Ryan Joe

Ryan Joe
Environmental Quality Programs Specialist II
NPDES Permits and Compliance Section

Department of Environment and Energy
[illegible]
Lincoln, Nebraska [illegible]

Jim Macy, Director
[illegible]
[illegible]

Patrick Boulas

From: Joe, Ryan <ryan.joe@nebraska.gov>
Sent: Wednesday, November 13, 2019 12:57 PM
To: Patrick Boulas
Cc: Brenda Osthus
Subject: RE: UNL Proposed SWMP Amendments

Hi Patrick,

Sorry for the delay in getting back to you on this. The Department approves of the proposed changes to UNL's SWMP and/or supporting documents as described in your email. Please document these changes in UNL's 2019 annual report. Please let me know if you have any questions.

Thanks!

Ryan Joe
Environmental Quality Programs Specialist II – Stormwater Coordinator

Nebraska Department of Environment and Energy
P.O. Box 98922
Lincoln, Nebraska 68509-8922
Main Office: 402-471-2186 / Direct: 402-471-8330

http://dee.ne.gov

From: Patrick Boulas <pboulas2@unl.edu>
Sent: Friday, November 08, 2019 8:46 AM
To: Joe, Ryan <ryan.joe@nebraska.gov>
Cc: Brenda Osthus <bosthus1@unl.edu>
Subject: UNL Proposed SWMP Amendments

Hi Ryan,

I am writing to obtain the Agency's concurrence on proposed minor changes to UNL's Stormwater Management Plan and/or supplemental supporting documents that were submitted to the Agency in support of our SMS4 permit.

1. UNL proposes to add the following incidental non-stormwater discharges to BMP 3.05 of our stormwater management plan: uncontaminated ground and storm water from foundation drains, utility vaults and tunnels; discharges from routine potable water line flushing, all of which are infrequent, occur in the event of emergency, or are necessary for proper maintenance and/or safety.
2. UNL also proposes to loosen any language in our stormwater permit or supporting documents that specifically states that records will be maintained in e-Builder. We would like to have flexibility to maintain records by other means, but in no way do we propose to eliminate any record keeping. The current language is unnecessarily restrictive.

Thank you,

-Patrick

Patrick Boulas

From: Joe, Ryan <ryan.joe@nebraska.gov>
Sent: Friday, February 7, 2020 10:44 AM
To: Patrick Boulas
Cc: Ducey, Patrick
Subject: RE: Proposed UNL Stormwater Management Plan Minor Modification

Good morning Patrick,

The Department approves of the proposed changes to UNL's SWMP as described in your email and we concur that these changes are minor modifications. Please update the SWMP and supporting documents to reflect the changes. Also, please document these changes in UNL's MS4 annual report. Let me know if you have any additional questions.

Thanks and have a great weekend!

Ryan Joe
Environmental Quality Programs Specialist II – Stormwater Coordinator

Nebraska Department of Environment and Energy
P.O. Box 98922
Lincoln, Nebraska 68509-8922
Main Office: 402-471-2186 / Direct: 402-471-8330

http://dee.ne.gov

From: Patrick Boulas <pboulas2@unl.edu>
Sent: Wednesday, February 05, 2020 12:54 PM
To: Joe, Ryan <ryan.joe@nebraska.gov>
Subject: Proposed UNL Stormwater Management Plan Minor Modification

Hi Ryan,

I am writing to obtain the Agency's concurrence that the changes proposed herein are minor modifications to UNL's Stormwater Management Plan. UNL proposes to remove emergency generator locations from the high risk facility designation described in the Runoff Control Plan whereby newly described information obtained in an assessment performed by UNL EHS Staff concluded that it is highly unlikely a spill/release during refueling operations would impact a receiving body. Enclosed in this email are the two assessments that describe the reasoning for removal of each emergency generator defined "high risk" in the 2019 revised Runoff Control Plan. Please note that UNL has met the permit condition for inspecting high risk facility emergency generators in 2019 and the proposed minor modification would remove high risk facility emergency generator inspections for the remainder of the permit term.

Thank you,

-Patrick

Patrick Boulas

From: Joe, Ryan <ryan.joe@nebraska.gov>
Sent: Thursday, March 19, 2020 12:03 PM
To: Patrick Boulas; Ducey, Patrick
Cc: Brenning, Alissa
Subject: RE: Proposed Minor Change

Good morning Patrick,

The Department concurs that the change requested in your email constitutes a minor modification to UNL's SWMP. Please detail this SWMP amendment in UNL's Annual Report.

Thank you, and please let me or Patrick know if you have any questions.

Ryan Joe
Environmental Quality Programs Specialist II – Stormwater Coordinator

Nebraska Department of Environment and Energy
P.O. Box 98922
Lincoln, Nebraska 68509-8922
Main Office: 402-471-2186 / Direct: 402-471-8330

http://dee.ne.gov

From: Patrick Boulas <pboulas2@unl.edu>
Sent: Thursday, March 19, 2020 11:40 AM
To: Joe, Ryan <ryan.joe@nebraska.gov>; Ducey, Patrick <patrick.ducey@nebraska.gov>
Cc: Brenning, Alissa <alissa.brenning@nebraska.gov>
Subject: Proposed Minor Change

Ryan and Patrick,

I am writing to obtain the Agency's concurrence that the change proposed herein constitutes a minor modification to UNL's Stormwater Management Plan. UNL Proposes to amend BMP 6.07 by replacing the language "inspecting affected O&M groups annually" with "interviewing O&M facility leadership annually". The current language is redundant to visual inspections of control measures already occurring in a strategy identified in the SWMP through BMP 6.03 and the Runoff Control Plan supporting document. Many of the control measures performed by O&M staff are administrative in nature where a visual site inspection would be unbecoming. The adherence of O&M groups to institutionally bound stormwater control measures should be managed directly by facility leadership. EHS Staff should be responsible for interviewing the facility leadership for adherence to the control measures of the O&M group employees.

Please let me know if you have any questions.

Thank you,

-Patrick

Appendix B -Statement of Qualifications related to Storm Water Management

For Permit year 2019 - BMP 4.04

Brenda Osthus

I. Educational Background:
- B.S. Medical Technology, Northwest Missouri State University, 1986
- Masters of Legal Studies, University of Nebraska - Lincoln, 1995

II. Professional Experience:
- Chemist III, State of Nebraska Department of Environmental Quality, 1987 – 1992
- Hazardous Materials Specialist, University of Nebraska Lincoln, Department of Environmental Health and Safety, 1992 – 1998
- Director, University of Nebraska Lincoln, Department of Environmental Health and Safety, 1998 - present

III. Professional Certifications/Professional Development
- Certified Hazardous Materials Manager, 1995
- Certified Erosion and Sediment Control Inspector (#2098), 2017
- Illicit Discharge Detection and Elimination Course, StormwaterOne, 2017

Patrick Boulas

I. Educational Background:
- B.A. in Geology, University of Colorado – Boulder, 2011

II. Professional Experience:
- Stormwater Specialist, University of Nebraska – Lincoln, EHS Department, 2019 - present
- EHS Technician, University of Nebraska – Lincoln, EHS Department 2017-2019
- Environmental Specialist, Leidos, 2016 - 2017
  Landfill monitoring and stormwater BMP application and maintenance.

III. Professional Certifications/Professional Development:
- NDOT Interim Erosion and Sediment Inspector Certification, February, 2019
- Erosion and Sediment Control Inspector Certification (#2289), April, 2019
- Center for Watershed Protection, Stormwater Practice Design, Installation, and Maintenance Webcast, 2019
- The Omaha Green Infrastructure Tour, 2019
- International Erosion Control Association, Effective MS4 Phase II Construction and Post-construction Program Management, 2019
- NDEE webex web seminar, Nuts and Bolts of NPDES Reporting, 2019
- 40 Hour HAZWOPER Training, 2017. 8 Hour HAZWOPER Refresher 2018, 2019

Bruce Haley

I. Educational Background:
- B.S. in Geology, University of Oklahoma

II. Professional Experience:
- Conducted quarterly audit and inspection of LLRW site in Boyd, Co., NE, 1994-1998
- UNL Project Manager of EPA lead Superfund Project, 2005 – Present

III. Professional Certifications/Professional Development:
- Professional Geologist
- Certification in Hydrogeology, Oklahoma State University, 1988
- Jacobson Helgoth Consultants, Basic Auditor Course, 1994
- NDOR Interim Erosion & Control Inspector Certification, December, 2017
- NDOR Erosion & Sediment Control Inspectors Course, February, 2018
- Active member of the UNL stormwater construction inspection team, 2018-present

Nick Jenkins

I. Educational Background:
- B.S. in Fisheries and Wildlife, University Nebraska Lincoln -

II. Professional Experience:
- EHS Technician, University of Nebraska – Lincoln, EHS Department 2017-present
- Environmental Scientist I, Smith Environmental and Engineering, 2015 - 2016
  Installation/inspection of BMPs, hydroseeding, herbicide/pesticide application, wetland restoration.

III. Professional Certifications/Professional Development:
- NDOT Certified Erosion and Sediment Control Inspector (# 2157), 2018
- Colorado DOT Erosion Control Supervisor (#24502)
- Colorado Certified Operator of Herbicide/Pesticide (#32258)
- Active member of the UNL stormwater construction inspection team, 2018-present

Appendix C

UNL's Updated Strategy for Designating High Priority Facilities (Excerpt from UNL's Runoff Control Plan)

UNL uses the following criteria to designate a facility as "high risk":

1. Emergency generator locations where a release during refueling operations is likely to reach a receiving water body considering distance to the storm inlet, distance from the storm inlet to a receiving water body, surface characteristics (concrete, grass, etc.), anticipated discharge rate/volume, and topography of the surrounding area;
2. Pesticide/herbicide bulk loading/unloading areas if a release is likely to reach a storm drain inlet;
3. Bulk chemical storage areas if a release occurs through mishandling or loading and unloading and the release is likely to enter a storm drain inlet;
4. 90-day hazardous waste storage facilities if, considering maximum container size and proximity of storm drains and topography, a release during loading/unloading is likely to reach a storm drain inlet (all other waste handling operations are conducted inside the facilities and the facilities are designed to provide containment of releases);
5. Outdoor, uncovered, confined animal holding facilities (e.g., pens or unprotected outdoor storage of animal feed, manure, bedding, etc.);
6. Storage of de-icing materials in a manner that could impact stormwater;
7. Commercial-like refuse support operations (e.g., compactors, garbage truck storage, refuse container storage, etc.);
8. Facility maintenance operations if storage or use practices make it likely that chemicals or other pollutants may reach a storm drain inlet through either normal operations or a release during use, mishandling, loading, or unloading.