



**University of Nebraska-Lincoln  
Stormwater Management Plan**

NPDES Permit: NER 310000 (sMS4)

Reviewed: March 2026

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## MCM 1&2: Public Education, Outreach, and Involvement Program

The University of Nebraska-Lincoln's Public Education, Outreach, and Involvement Program targets faculty, staff, and students. Educational outreach activities directed at construction contractors working on UNL's City and East Campuses are discussed in Minimum Control Measure 4, Construction Site Run-off Control (BMP 4.06).

The overall goal of UNL's Public Education, Outreach, and Involvement Program is to minimize adverse impacts from storm water run-off and illicit discharges associated with UNL's SMS4. UNL's program includes relevant topics such as illegal dumping, illicit discharges, E.coli and ammonia water quality impairment information, vehicle maintenance, street maintenance, spill response, proper waste management, and post-construction BMPs. Specific objectives of this program are to:

- Enhance awareness of potential sources of storm water pollution, with special emphasis on pollutants for which a TMDL has been established for a receiving water from UNL's SMS4.
- Enhance awareness of strategies used to minimize pollutants in storm water run-off.
- Enhance awareness of strategies used to minimize increases in storm water run-off volume and rate.
- Encourage the UNL community to become familiar with UNL's Storm Water Management Plan, and provide comments and suggestions for improvements.
- Encourage the UNL community to be aware of and promptly report potential discharges of pollutants or failures of any features of UNL's storm water conveyance or control system.
- Encourage every member of UNL's community to adhere to those good housekeeping and pollution prevention practices that are applicable to their activities and role at UNL.

Examples of various means of distributing information include fliers, press releases, signage, PowerPoint presentations, online training, informational booths, presentations and guest lectures, UNL EHS maintained website, EHS listserv, and on-line publications from UNL Communications. There are approximately 1,354 subscribers to the EHS listserv. "Nebraska Today" is a newsletter that is emailed to all faculty and staff throughout the year. "Next@Nebraska" is a newsletter that is emailed weekly during the school year to students.

EHS maintains an on-line reporting tool, Stormwater Pollution Reporter, to facilitate reporting of concerns by the campus community. This reporting tool is prominently displayed on the EHS home page ([www.ehs.unl.edu](http://www.ehs.unl.edu)). The EHS web page also contains many other resources, such as EHS authored guidance documents (SOPs), links to UNL Extension publications, links to federal and state resources, links to professional storm water organizations, and information on sustainability initiatives, which often include storm water considerations.

Requirement: MCM 1 Public Education	
<b>Reference</b>	<p><b>BMP 1.01 Public Education</b> (Part IV.B.1.a.1)</p> <p>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.</p>
<b>Responsible</b>	EHS: Environmental Specialist
<b>Strategy</b>	<p>(a) EHS will continue to publish and update storm water educational information on the EHS web site.</p> <p>(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.</p> <p>(c) EHS will continue to distribute storm water awareness information at gatherings specifically targeting new students.</p> <p>(d) EHS will continue to publish articles related to storm water in the EHS listserv.</p> <p>(e) 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.</p>
<b>Measurable Goals</b>	<p><b>All Years:</b></p> <ol style="list-style-type: none"> <li>1. At least annually, review and update storm water educational information contained on EHS’s web site.</li> <li>2. At least annually, sponsor a storm water awareness booth at a large student event.</li> <li>3. At least annually, publish a storm water awareness article in the EHS list serve.</li> <li>4. 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.</li> </ol>
<b>Report</b>	<ol style="list-style-type: none"> <li>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 information presented/distributed (during the prior year).</li> </ol>

	<ol style="list-style-type: none"> <li>2. Date, summary of information distributed through EHS listserv, Nebraska Today, or Next@Nebraska</li> <li>3. Summary of changes made to the EHS web site relative to available educational materials (during the prior year).</li> <li>4. Number of persons completing an EHS training module that contains a storm water awareness message (during the prior year).</li> </ol>
<b>Evaluation: Environmental Indicators of Effectiveness</b>	N/A
<b>Requirement: MCM 2 Outreach and Involvement</b>	
<b>Reference</b>	<p>BMP 2.01 Outreach and Involvement (Part IV.B.1.a.2)</p> <ol style="list-style-type: none"> <li>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.</li> </ol>
<b>Responsible</b>	EHS: Environmental Specialist
<b>Strategy</b>	<ol style="list-style-type: none"> <li>1. EHS will maintain the on-line Stormwater Pollution Reporter tool.</li> <li>2. EHS will solicit feedback on UNL's SWMP and proposed revisions by: <ol style="list-style-type: none"> <li>a. Adding language to the EHS web site asking for comments and suggestions from the campus community.</li> <li>b. Soliciting comments and suggestions with announcements published in the EHS listserv.</li> <li>c. Soliciting comments and suggestions at meetings of the Chancellor's University Safety Committee, which has broad faculty and staff representation.</li> <li>d. Soliciting comments and suggestions by sending written notice to or attending a meeting of ASUN (Student Government)</li> </ol> </li> <li>3. EHS will announce publication of its annual report and solicit feedback using the same mechanisms described above.</li> </ol>

<b>Measurable Goals</b>	<p><b>Year 1:</b></p> <p>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.</p> <p><b>All Years:</b></p> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>3. UNL’s most current SMS4 permit and SWMP will be available on the EHS web site for public viewing throughout the permit term.</li> </ol>
<b>Report</b>	<p>Summary of public notices, including date, content, and mechanisms of distribution. Documentation of all comments and responses will be available upon request.</p>
<b>Evaluation: Environmental Indicators of Effectiveness</b>	<p>N/A</p>

## MCM 3: Illicit Discharge Detection Elimination Program

The purpose of the University of Nebraska-Lincoln's Illicit Discharge Detection Elimination (IDDE) Program is to detect and eliminate non-storm water discharges of pollutants to receiving waters, including discharges for which a TMDL has been established due to a water quality impairment.

In support of UNL's IDDE program, EHS collaborates with UNL's Utility Services to maintain an up-to-date map of UNL's storm sewer system that includes the location of all outfalls; names and location of all waters of the state that receive discharges from UNL's outfalls; drainage areas within UNL's City and East Campuses that contribute to the storm sewer system; and, connections to the City of Lincoln's storm sewer system (including information on ownership of conveyance systems that transect UNL property).

As part of the IDDE program, EHS conducts annual dry weather inspections of all outfalls that are 8" or greater in size, unless such outfall cannot be safely accessed due to site conditions. These inspections are documented, and conducted in accordance with written procedures. The written procedures include minimum staff and equipment needed to conduct these inspections, and the process used to evaluate outfalls. Information captured includes date and time of inspection, name of inspector, date of last significant rainfall event, outfall physical condition (e.g., damage, deposits/stains, vegetation, sediment accumulation), physical indicators (e.g., odor, color, turbidity, sheen, suds/foaming, trash) for outfalls with flows, water quality screening parameters (e.g., ammonia, chlorine, hardness, alkalinity, pH, nitrate, conductivity, temperature) for outfalls with flows, and illicit discharge investigation details for flows that appear consistent with an illicit discharge. The written procedures also include instruction on discharges that must be immediately reported to NDEE and instruction on documenting follow-up actions taken to eliminate illicit discharges.

In addition to dry weather monitoring of outfalls, EHS maintains an on-line reporting tool, Stormwater Pollution Reporter, to facilitate reporting of potential illicit discharges by the campus community or any other person. This reporting tool is prominently displayed on the EHS home page ([www.ehs.unl.edu](http://www.ehs.unl.edu)). EHS investigates all reports of potential illicit discharges in accordance with the procedures described above.

**Requirement: MCM 3 Illicit Discharge Detection Elimination**

<b>Reference</b>	<p>BMP 3.01 Enforcement Plan (Part IV.B.2.a.1.a)</p> <p>a. The permittee must, as part of the IDDE program, develop an enforcement plan or mechanism following the requirements of <b>Parts III.A and B</b> of this permit.</p>
<b>Responsible</b>	EHS: Environmental Specialist
<b>Strategy</b>	EHS will continue to have and implement an Enforcement Response Plan
<b>Measurable Goals</b>	<b>All Years:</b> The formal written Enforcement Plan will be implemented. The plan will be reviewed annually for needed modifications/updates.
<b>Report</b>	EHS will report substantial changes made to the Enforcement Plan with each annual report.
<b>Evaluation: Environmental Indicators of Effectiveness</b>	N/A
<b>Reference</b>	<p>BMP 3.02 Mapping (Part IV.B.2.a.1.b): The IDDE program must include or address:</p> <p>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;</p>
<b>Responsible</b>	Utilities: GIS Project Manager
<b>Strategy</b>	The GIS Project Manager is informed of all projects that involve changes to the existing storm water system through the UNL construction management process.
<b>Measurable Goals</b>	<b>All Years:</b> 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.

<b>Report</b>	The GIS map will be available for review by the permitting authority upon request. No reporting.
<b>Evaluation: Environmental Indicators of Effectiveness</b>	N/A
<b>Reference</b>	<p><b>BMP 3.03 Dry-Weather Field Screening</b></p> <p>(Part IV.B.2.a.1.c): The IDDE program must include or address:</p> <p>c. Outfall field screening procedures and priority locations to investigate for detecting illicit discharges;</p> <p>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;</p> <p>II. The screening procedures must identify the minimum staff, equipment, and discharge evaluation process used by the permittee; and</p> <p>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.</p>
<b>Responsible</b>	EHS: Environmental Specialist
<b>Strategy</b>	<ol style="list-style-type: none"> <li>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.</li> <li>2. A current map listing all qualifying outfalls will continue to be maintained, as described in BMP 3.02.</li> </ol>
<b>Measurable Goals</b>	<b>All Years:</b> 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.
<b>Report</b>	<ol style="list-style-type: none"> <li>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.</li> <li>2. Provide a summary of illicit discharges identified through dry weather monitoring during the prior year's inspections.</li> </ol>
<b>Evaluation: Environmental</b>	None

<b>Indicators of Effectiveness</b>	
<b>Reference</b>	<p><b>BMP 3.04 Illicit Discharge Investigation and Response</b>  (Part IV.B.2.a.1.d &amp; e): The IDDE program must include or address:</p> <p>d. Procedures, staff, and equipment required for investigating and tracing the source of all identified illicit discharge;</p> <p>(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</p> <p>(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.</p> <p>e. Procedures for removing the source of the discharge using the Enforcement Response Plan in <b>Part III.B:</b></p> <p>(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;</p> <p>(ii) The permittee must document all interactions with potentially responsible parties as well as follow-up investigations to confirm illicit discharges have been removed.</p>
<b>Responsible</b>	EHS: Environmental Specialist
<b>Strategy</b>	<ol style="list-style-type: none"> <li>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 &amp; e of the General Permit) and as described in the narrative for this MCM.</li> <li>EHS will implement its Enforcement Response Plan as described in BMP 3.01.</li> </ol>
<b>Measurable Goals</b>	<p><b>All Years:</b></p> <p>EHS will take action to eliminate all identified illicit discharges to UNL's storm sewer system.</p>
<b>Report</b>	Summarize nature of each illicit discharge identified during the previous year and actions taken to eliminate the discharge.

<b>Evaluation: Environmental Indicators of Effectiveness</b>	Report any analytical data obtained to characterize illicit discharges detected during the previous year.
<b>Reference</b>	<p><b>BMP 3.05 Non-Stormwater Discharges</b></p> <p>(Part IV.B.2.a.1.f): The IDDE program must include or address:</p> <p>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).</p> <ul style="list-style-type: none"> <li>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 <b>Part IV.B. 2.e</b>). 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.</li> <li>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.</li> </ul>
<b>Responsible</b>	EHS: Environmental Specialist
<b>Strategy</b>	<p><b>List of Additional Incidental Non-Stormwater Discharges:</b></p> <p>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. <b>Local Controls:</b></p>

	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.
<b>Measurable Goals</b>	<b>All Years:</b> None.
<b>Report</b>	Any changes to local controls.
<b>Evaluation: Environmental Indicators of Effectiveness</b>	Report all analytical sampling data generated from incidental discharges from the previous year, if analytical testing is conducted.
<b>Reference</b>	BMP 3.06 Adjacent MS4 Cooperation (Part IV.B.2.a.2&3)  <ol style="list-style-type: none"> <li>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.</li> <li>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 <b>Part IV.B.2.a.1.b-d.</b></li> </ol>
<b>Responsible</b>	EHS: Environmental Specialist
<b>Strategy</b>	EHS will continue to maintain cooperative reporting and investigation practices with the City of Lincoln, as described in UNL's IDDE procedure.
<b>Measurable Goals</b>	<ol style="list-style-type: none"> <li>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.</li> <li>2. EHS will investigate all reports of suspected illicit discharges received from the City of Lincoln, in accordance with UNL's IDDE investigation procedures.</li> </ol>
<b>Report</b>	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.
<b>Evaluation: Environmental Indicators of Effectiveness</b>	N/A

<b>Reference</b>	<p><b>BMP 3.07 Public Reporting of Non-Storm Water Discharges and Spills</b> (Part IV.B.a.2.b.1-3)</p> <ol style="list-style-type: none"> <li>1) The permittee must promote, publicize, and facilitate public reporting of illicit discharges or water quality impacts associated with discharges into or from MS4s.</li> <li>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.</li> <li>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.</li> </ol>
<b>Responsible</b>	EHS: Environmental Specialist
<b>Strategy</b>	<ol style="list-style-type: none"> <li>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.</li> <li>2. UNL's IDDE procedure contains spill/dumping response procedures and contact information for various departments and agencies that may need to be notified.</li> <li>3. UNL's IDDE procedure addresses tracking, investigation, and follow up on all reports of illicit discharges.</li> </ol>
<b>Measurable Goals</b>	<p><b>All Years:</b></p> <p>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.</p>
<b>Report</b>	<ol style="list-style-type: none"> <li>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.</li> <li>2. Report substantial changes made to UNL's IDDE procedures.</li> </ol>
<b>Evaluation: Environmental Indicators of Effectiveness</b>	Report analytical results of water quality sampling conducted in response to illicit discharge investigations, if conducted.

<b>Reference</b>	<b>BMP 3.08 Illicit Discharge Education and Training</b> (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 <b>Part IV.B.2.c.1</b> 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.
<b>Responsible</b>	EHS: Stormwater Specialist
<b>Strategy</b>	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.
<b>Measurable Goals</b>	<b>Year One:</b>  1. Identify field staff that are required to participate in the training. 2. Deliver training to field staff.  <b>All Subsequent Years:</b>  1. Design refresher training materials and distribute to previously trained staff. 2. Deliver training to newly hired field staff.
<b>Report</b>	1. Number of newly trained staff, by department.  2. Number of staff receiving refresher training, by department.
<b>Evaluation: Environmental Indicators of Effectiveness</b>	N/A

## **MCM 4: Construction Site Runoff Control**

The University of Nebraska-Lincoln has established a construction site runoff control program that requires all construction projects on City and East campuses that disturb one acre or greater or projects less than an acre but part of a larger project to hold a NPDES Construction General Permit. Prior to starting work, General contractors must submit their Erosion and Sediment Control Plans to EHS for review and approval prior to commencing earth disturbing activities. In addition, EHS participates in pre-construction meetings by discussing or providing education material to General Contractors that discusses their obligations under NDEE's NPDES Construction General Permit and UNL's SMS4 NPDES permit. EHS conducts routine inspections of construction sites to evaluate the effectiveness of site-specific runoff controls, as well as compliance with other aspects of NDEE's NPDES Construction General Permit. Audit findings are communicated to the General Contractor and UNL's Construction Project Manager. Follow-up communication and/or inspections establish whether appropriate corrective actions were implemented by the General Contractor.

### **Authority**

UNL has established appropriate authority to support the construction site runoff control program through General Construction Contracts and Project Specifications. A summary of provisions in each of these mechanisms of authority follows.

#### General Construction Contract:

- Contains provisions that require the contractor to obtain coverage under NDEE's NPDES Construction General Permit when applicable and adhere to all requirements of the permit at all times.
- Specifically requires contractors to minimize sediment runoff, track out, and promptly clean streets of sediment.
- Requires contractor to adhere to proper site dewatering practices.
- Establishes authority for UNL to issue stop work orders as necessary if contractor fails to correct deficiencies.
- Requires contractor to provide prompt notification of releases of hazardous substances and petroleum and to take immediate action to stop and clean-up the release.

#### General Specification:

- Requires contractor to develop a SWPPP and Erosion and Sediment Control Plan (ESCP) for sites subject to NDEE's NPDES Construction General Permit and submit the ESCP to UNL EHS for review and approval prior to earth disturbing activities.
- Requires contractors to: 1) Plan for, implement, and maintain reasonable measures to prevent storm water pollution resulting from construction activities, 2) Report to the owner any release of any quantity of hazardous material at the construction site, 3) Maintain good housekeeping at the construction site, 4) Take corrective action to rectify concerns expressed by the Owner's representatives related to storm water pollution prevention controls.

**Outreach**

A primary reference tool to support UNL's SWMP with respect to contractor education is the EHS web site. This website is continually updated as new resources are developed or identified. It contains guidance materials developed specifically for UNL (under the heading of Safe Operating Procedures), as well as links to information provided by local, state, and federal authorities. Links are also provided to professional organizations and other materials that are educational in nature. Some of the materials are fairly general and are intended for awareness purposes (e.g., After the Storm Video link), while others are very specific (e.g., Nebraska Department of Transportation Construction Stormwater Best Management Practices Manual, City of Lincoln Drainage Criteria Manual, Chapter 8, Construction Best Management Practices, Omaha Regional Stormwater Design Manual, etc.). This web site will also contain UNL's SMS4 permit, SWMP, annual reports, and key supporting procedures (e.g., Enforcement Response Plan, etc.).

Requirement: MCM 4 Construction Site Runoff Control	
<b>Reference</b>	<p>BMP 4.01 Enforcement (Part IV.B.3.b)</p> <p>The permittee must, as part of the construction requirements and control measures, develop an enforcement plan or mechanism following the requirements of <b>Parts III.A</b> and <b>B</b> of this permit</p>
<b>Responsible</b>	EHS: Environmental Specialist
<b>Strategy</b>	See BMP 3.01. UNL's enforcement response plan addresses construction sites.
<b>Measurable Goals</b>	See BMP 3.01
<b>Report</b>	See BMP 3.01
<b>Evaluation: Environmental Indicators of Effectiveness</b>	None
<p><b>Reference</b></p> <p>BMP 4.02 Site Plan Review and Approval (Part IV.B.3.c)</p> <p>The permittee must require each operator of a construction activity described in <b>Part IV.B.3.a</b> 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:</p> <ol style="list-style-type: none"> <li>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.</li> <li>2) The permittee must use qualified individuals, knowledgeable in the technical review of erosion and sediment control plans to conduct such reviews.</li> <li>3) The permittee must document its review of erosion and sediment control plan using a checklist or similar process.</li> </ol>	

	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.
<b>Responsible</b>	EHS: Environmental Specialist
<b>Strategy</b>	<p>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.</p> <p>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.</p> <p>A current inventory of permitted construction sites is maintained by EHS.</p>
<b>Measurable Goals</b>	<p><b>All Years:</b></p> <p>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.</p>
<b>Report</b>	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.
<b>Evaluation: Environmental Indicators of Effectiveness</b>	N/A
<b>Reference</b>	<p>BMP 4.03 Construction Site Inspection and Enforcement (Part IV.B.3.d)</p> <ol style="list-style-type: none"> <li>1. The permittee must inspect public and private construction activity according to local procedures with a strategy documented in the SWMP.</li> <li>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: <ol style="list-style-type: none"> <li>(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;</li> <li>(b) Review the applicable erosion and sediment control plan and conduct a</li> </ol> </li> </ol>

	<p>thorough site inspection to determine if control measures have been selected, installed, implemented, and maintained according to the plan;</p> <p>(c) Assess compliance with the permittee’s ordinances and permits related to storm water runoff, including the implementation and maintenance of designated MCM;</p> <p>(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;</p> <p>(e) Provide education and outreach on storm water pollution prevention, as needed; and</p> <p>(f) Provide a written or electronic inspection report generated from findings in the field.</p> <p>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.</p> <p>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 <b>Part III.B</b>. These follow-up and enforcement actions must be tracked and maintained for review by the permitting authority.</p>
<b>Responsible</b>	EHS: Environmental Specialist
<b>Strategy</b>	<p>Qualified EHS staff (as described in BMP 4.02) will inspect permitted construction sites at the following frequency:</p> <p>(a) At least 2 (two) times a year in every twelve month period;</p> <p>(b) Upon report of a concern;</p> <p>(c) When needed to verify correction of deficiencies identified during a previous inspection.</p> <p>Inspections will be conducted in accordance with written procedures.</p> <p>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.</p>
<b>Measurable Goals</b>	<b>All Years:</b> 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.
<b>Report</b>	<p>1. Percentage of permitted sites that EHS inspected at the targeted frequency.</p> <p>2. Summary of substantial changes made to the written construction site inspection procedures during the prior year.</p>

<b>Evaluation: Environmental Indicators of Effectiveness</b>	NA
<b>Reference</b>	<p><b>BMP 4.04 Staff Training</b> (Part IV.B.3.e)</p> <p>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.</p>
<b>Responsible</b>	EHS: Environmental Specialist
<b>Strategy</b>	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.
<b>Measurable Goals</b>	<p><b>All Years</b></p> <p>EHS will maintain training records for all persons authorized to implement BMP 4.02 or 4.03.</p>
<b>Report</b>	Names of staff persons assigned responsibilities under BMP 4.02 and 4.03 and a summary of their qualifications.
<b>Evaluation: Environmental Indicators of Effectiveness</b>	N/A
<b>Reference</b>	<p><b>BMP 4.05 Construction Site Operator Education</b> (Part IV.B.3.f.1)</p> <p>1. The permittee must make publically 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.</p>

	<p>(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.</p> <p>(c) The permittee must make available appropriate outreach materials to all construction operators who will be disturbing land within the MS4 boundary.</p> <p>(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.</p>
<b>Responsible</b>	EHS: Environmental Specialist
<b>Strategy</b>	<ol style="list-style-type: none"> <li>1. EHS will continue to participate in pre-construction meetings with General Contractors to discuss or provide written information that discusses 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.</li> <li>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.</li> <li>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.</li> </ol>
<b>Measurable Goals</b>	<p><b>All Years of the Permit:</b></p> <ol style="list-style-type: none"> <li>1. Annually, EHS will review/ enhance the materials made available for the purpose of General Contractor education and outreach.</li> <li>2. EHS will participate in a pre-construction meeting with every General Contractor for newly permitted sites.</li> </ol>
<b>Report</b>	<ol style="list-style-type: none"> <li>1. Summary of changes made to educational and outreach materials related to construction best management practices.</li> <li>2. Percentage of newly permitted sites where EHS held or provided contractor education materials to the General Contractor in a pre-construction meeting or by written instruction.</li> </ol>
<b>Evaluation: Environmental</b>	N/A

<b>Indicators of Effectiveness</b>	
<b>Reference</b>	<p>BMP 4.06 Public Involvement (Part IV.B.3.f.2)</p> <p>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.</p>
<b>Responsible</b>	EHS: Environmental Specialist
<b>Strategy</b>	<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> </ol>
<b>Measurable Goals</b>	<p><b>All Years:</b></p> <ol style="list-style-type: none"> <li>1. EHS will maintain our existing procedure for reporting suspected illicit discharges including specific concerns related to construction projects (<a href="https://ehs.unl.edu/sites/unl.edu.business-and-finance.university-operations.ehs/files/media/file/s-stormwater_IDDE_2.pdf">https://ehs.unl.edu/sites/unl.edu.business-and-finance.university-operations.ehs/files/media/file/s-stormwater_IDDE_2.pdf</a>). This procedure is publically available on the EHS website.</li> <li>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).</li> <li>3. EHS will maintain our on-line public reporting mechanism (<i>Stormwater Reporter</i>) on the EHS web page.</li> </ol>
<b>Report</b>	Summary of each complaint received and actions taken to resolve each complaint.
<b>Evaluation: Environmental Indicators of Effectiveness</b>	Report any water quality sampling done in response to public reporting.

## **MCM 5: Post Construction Stormwater Program**

### **Water Quality and Quantity Standards**

The University of Nebraska-Lincoln has adopted post construction water quality and quantity standards. These standards are found in the UNL Design Guidelines (<http://facilities.unl.edu/design-guidelines>). The UNL Design Guidelines identify the standards and preferences of the University of Nebraska-Lincoln (UNL) Facilities Planning and Construction (FPC) and are applied to all remodels and new construction. The UNL Design Guidelines also address post-construction stormwater structural control design criteria by referencing the City of Lincoln Drainage Criteria Manual. UNL's stormwater quality standard seeks to retain the first half-inch of precipitation. UNL's stormwater quantity goal seeks to protect pre-development hydrology to the maximum extent practicable.

### **Authority and Enforcement**

The primary mechanisms for requiring compliance with UNL's water quality, water quantity, and structural controls design criteria is through UNL's General Construction Contract and site-specific supporting construction specifications and documents. Through these mechanisms, all designs must be reviewed and written approval provided by UNL during the design phase of the project. Any proposed deviations from approved designs must be submitted to UNL in writing by the Contractor and authorized and accepted by UNL. Hence, any deviation from the original design is documented in the construction documents.

The contractor's conformance to design criteria is assessed periodically throughout the construction process by the Architect and UNL (Owner). Final acceptance of the contractor's work is contingent upon issuance of a certificate of substantial completion, which is only issued when the work conforms to the contract documents (including design and installation). Further, UNL requires contractors to provide a one-year post-construction warranty period during which time the contractor is obligated to remedy deficiencies that were undetected at the time of issuance of the certificate of substantial completion. UNL retains the right to withhold payment for defective work, or work that does not conform to specified designs.

### **Tracking, Inspection, and Long-Term Maintenance**

Tracking, inspection, and long-term maintenance of post-construction structural BMPs involves collaboration of several UNL departments, primarily EHS, Landscape Services, and Utilities. One particularly useful tool that is shared by these groups is the UNL GIS system that tracks and maps University assets, such as buildings, chilled water lines, sanitary and storm sewer lines, floor plan details, emergency generator locations, and many other attributes and details. Currently, this system is used for mapping of storm sewer lines and outfalls. It is capable of accepting data on post-construction structural BMPs. Maintenance and inspection plans for specific BMPs can be associated and loaded into the system. Most University service units utilize a work order system to track and document preventative maintenance on specific assets. These systems are capable of supporting stormwater BMPs. EHS conducts an audit function of service units that have responsibility for maintaining BMPs to ensure that regular inspection and preventative maintenance of BMPs occurs.

**Requirement: MCM 5 Post Construction Management Program**

<p><b>Reference</b></p>	<p><b>BMP 5.01 Site Performance Standards</b> (Part IV.B.4.b)</p> <p>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.</p> <p>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.</p>
<p><b>Responsible</b></p>	<p>EHS: Environmental Specialist</p>
<p><b>Strategy</b></p>	<p>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.</p>
<p><b>Measurable Goals:</b></p>	<p><b>Year One:</b> UNL will review existing performance standards to determine if changes are appropriate or necessary.</p> <p><b>Ongoing All Years:</b> Maintain site performance standards</p>
<p><b>Report</b></p>	<p>Report any changes to performance standards made during the preceding year.</p>
<p><b>Evaluation: Environmental Indicators of Effectiveness</b></p>	<p>NA</p>
<p><b>Reference</b></p>	<p><b>BMP 5.02 Post-Construction Site Plan Review</b> (Part IV.B.4.c.1.a)</p> <p>1. To ensure that all applicable new development and redeveloped sites conform to the performance standards required in <b>Part IV.B.4.b</b> the permittee</p>

	<p>must conduct project review, approval, and enforcement procedures that include:</p> <p>(a) Procedures for the site plan review and approval process(es) and modification when changes to an approved plan are desired.</p>
<b>Responsible</b>	EHS: Environmental Specialist
<b>Strategy</b>	<ol style="list-style-type: none"> <li>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.</li> <li>2. Reviews will be documented in accordance with EHS's Internal Operating Procedure, <i>BMP 5.02 Post-Construction Plan Review and Approval</i>.</li> </ol>
<b>Measurable Goals</b>	<b>Ongoing All Years:</b> Conduct and document the site plan reviews for all (100%) of applicable construction projects.
<b>Report</b>	<p><b>All Years:</b></p> <ol style="list-style-type: none"> <li>1. Percentage of applicable construction projects initiated in the prior year that were reviewed and approved.</li> </ol>
<b>Evaluation: Environmental Indicators of Effectiveness</b>	none
<b>Reference</b>	<p>BMP 5.03 As-Builts</p> <p>(Part IV.B.4.c.1.b)</p> <p>(b) A requirement for submittal of "as-built" certifications in a schedule defined in the SWMP and approved by the NDEE.</p>
<b>Responsible</b>	<p>FPC: Project Manager</p> <p>EHS: Environmental Specialist</p>
<b>Strategy</b>	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.
<b>Measurable Goals</b>	<b>All Years of Permit:</b> 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.

<b>Report</b>	<b>All Years of Permit:</b> Report percentage of applicable projects completed within the prior year for which complete as-built information is on file.
<b>Evaluation: Environmental Indicators of Effectiveness</b>	none
<b>Reference</b>	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.
<b>Responsible</b>	FPC: Project Managers EHS: Environmental Specialist
<b>Strategy</b>	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
<b>Measurable Goals</b>	<b>All Years:</b> 100% of all newly-constructed structural post-construction BMPs at sites subject to post-construction design criteria will be inspected by the A/E.
<b>Report</b>	<b>All Years:</b> 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.

<b>Evaluation: Environmental Indicators of Effectiveness</b>	None
<b>Reference</b>	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.
<b>Responsible</b>	EHS: Environmental Specialist
<b>Strategy</b>	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.
<b>Measurable Goals</b>	<b>All Years:</b> 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 ( <a href="https://ehs.unl.edu/sites/unl.edu.business-and-finance.university-operations.ehs/files/media/file/s-stormwater_IDDE_2.pdf">https://ehs.unl.edu/sites/unl.edu.business-and-finance.university-operations.ehs/files/media/file/s-stormwater_IDDE_2.pdf</a> ). 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.
<b>Report</b>	<b>All Years:</b> 1. Number and summary of complaints received and follow-up actions. 2. Summary of any changes to related procedures resulting from a complaint.
<b>Evaluation: Environmental Indicators of Effectiveness</b>	Report any water quality sampling done in response to public reporting.
<b>Reference</b>	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

	<p>implemented at new development and redeveloped sites, including both public and private sector sites located within the permit area.</p> <ol style="list-style-type: none"> <li>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.</li> <li>3. Based on inspections conducted under <b>Part IV.B.4.f</b>, 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.</li> </ol>
<b>Responsible</b>	<p>EHS: Environmental Specialist</p> <p>Utilities: GIS Project Manager</p>
<b>Strategy</b>	<p>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.</p>
<b>Measurable Goals</b>	<p><b>All Years:</b> 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.</p>
<b>Report</b>	<p><b>All Years:</b></p> <ol style="list-style-type: none"> <li>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.</li> <li>2. Number of post-construction permanent BMPs at new development and redevelopment sites completed during the previous year, sorted by type.</li> </ol>
<b>Evaluation: Environmental Indicators of Effectiveness</b>	<p>None</p>

## MCM 6: Pollution Prevention and Good Housekeeping

The University of Nebraska Lincoln (UNL) City and East Campuses comprise approximately 617 acres of land (342 on East Campus and 275 on City Campus), upon which 200+ buildings have been erected to support the nearly 26,000 students, 1,700 faculty, and 4,500 staff. Building and grounds usage includes parking lots and garages, greenhouses, recreation fields, residential housing, offices, research and teaching laboratories, classrooms, libraries, healthcare, animal housing (indoor and outdoor), equipment storage, vehicle fleet maintenance, steam generation plants, landscaping operations, streets, sidewalks, and green spaces. These campus assets are inventoried in an extensive GIS mapping system that includes all University buildings, grounds, streets, parking lots, recreation areas, and detailed information on infrastructure (e.g., roads, chilled water lines, domestic water lines, sanitary sewer systems, steam lines, gas lines, etc.). The storm sewer mapping feature includes pipes (size and material of construction), inlets, manholes, open channels, box culverts, and outfalls. The GIS system continues to evolve over time to include additional detail, such as chemical storage and use areas, landscaping details, and environmental considerations (e.g., SPCC plans, air permitting details, environmental deed restrictions, long-term monitoring plans, etc.).

The UNL facilities listed below are identified as having a higher potential to generate storm water pollutants. The rationale for listing each of the facilities as “high priority” facilities is provided.

- City Campus Transportation Services (vehicle maintenance and/or fueling operation)
- City and East Campus Utility Plants (steam generation, bulk chemical storage)
- City and East Campus Landscape Services, including the facilities located on Military Road (deicing material storage, equipment maintenance and storage, trash vehicle/receptacle storage, trash compacting, pesticide/herbicide storage, landscaping material storage, fueling operations)
- East Campus 90-day Hazardous Waste Storage Facility (loading and unloading of 55-gallon drums or smaller containers and a storm drain inlet is located in the immediate vicinity of the loading dock; surface is gravel)
- Outdoor (Animal Sciences Complex on East Campus) animal holding areas (potential source of pollutants in animal excreta, particularly *Escherichia coli* and ammonia)

Certain of the storm water controls for Landscape Services extend to the entire campus, based on the responsibilities of this department, and include street maintenance, litter removal including football game day trash pick-up, and turf and planting bed maintenance. Likewise, certain of the storm water controls for the Utility Plant extend to the entire campus, based on the responsibilities of the department, and include storm inlet and sewer maintenance. Good housekeeping practices and certain specific stormwater pollution prevention controls have been established for each of these facilities. These existing practices and controls form the basis for UNL’s written Facility Runoff Control Plan (RCP) and affected staff in each of these units/departments will be trained on the RCP.

EHS inspects each of these high priority facilities at least annually to ensure conformance to established storm water controls and general good housekeeping measures. The objective of the inspection is to ensure that practices are consistent with minimizing potential adverse storm water impacts to the maximum extent practicable.

EHS also publishes a number of SOPs and training materials that apply to these high priority facilities as well as the broader campus community, and have relevance to storm water protection. Adherence to these procedures is regularly evaluated through campus inspections by EHS. Examples of written and training materials produced by EHS follows:

- UNL's Injury and Illness Prevention (IIPP) training contains storm water awareness information and general housekeeping to prevent adverse impacts (e.g., pick up after pets, use trash receptacles, maintain vehicles to prevent leaks, report suspected illicit discharges, etc.).
- The EHS Virtual Manual tool creates a general safety manual for any campus user. This manual contains narrative on potential storm water pollutants and encourages reporting of suspected illicit discharges.
- A number of EHS SOPs target proper management of regulated wastes. EHS also publishes information on proper responses to spills/leaks of chemicals or fuels/oils.

The BMPs identified in this MCM are intended to complement and enhance UNL's existing pollution prevention and good housekeeping program.

**Requirement: MCM 6 Pollution Prevention and Good Housekeeping**

<b>Reference</b>	<p>BMP 6.01 Mapping and Inventory (Part IV.B.5.a)</p> <p>a. Municipal Facility and Control Inventory</p> <p>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.</p> <p>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.</p>
<b>Responsible</b>	Operational Technology Department: Geospatial Analyst
<b>Strategy</b>	UNL’s Geospatial Analyst is informed of construction projects on the UNL campus and ensures that campus GIS maps are updated to reflect changes.
<b>Measurable Goals</b>	<b>All Years:</b> Update maps as needed in response to campus changes.
<b>Report</b>	The GIS map will be available for review by the permitting authority upon request. No reporting.
<b>Evaluation: Environmental Indicators of Effectiveness</b>	N/A
<b>Reference</b>	<p>BMP 6.02 Municipally Owned or Operated Facility Assessment (Part IV.B.5.b)</p> <p>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.</p> <p>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.</p> <p>3) The permittee must document the results of the assessments and maintain copies of all site evaluation documents used to conduct the assessment.</p>
<b>Responsible</b>	EHS: Environmental Specialist

<b>Strategy</b>	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.
<b>Measurable Goals</b>	<b>Ongoing all years:</b> UNL will conduct and document assessments as new facilities are built or established.
<b>Report</b>	<ol style="list-style-type: none"> <li>1. Changes to EHS’s assessment strategy to identify “high priority” facilities made during the reporting period will be included in the annual report.</li> <li>2. A list of newly identified “high priority” facilities made during the reporting period will be included in the annual report.</li> </ol>
<b>Evaluation: Environmental Indicators of Effectiveness</b>	N/A
<b>Reference</b>	<p>BMP 6.03 Runoff Control Plans (Part IV.B.5.c)</p> <p>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.</p> <p>(a) For each “high priority” facility or operation identified in <b>Part IV.B.5.b</b>, the permittee must develop or maintain a site-specific RCP that identifies storm water control measures, inspection strategy, and visual monitoring procedures.</p> <p>(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.</p> <p>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.</p>
<b>Responsible</b>	EHS: Environmental Specialist
<b>Strategy</b>	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.
<b>Measurable Goals</b>	<b>Year One:</b> EHS will ensure that a copy of UNL’s RCP is on file at each high priority facility.

	<b>All Subsequent Years:</b> 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.
<b>Report</b>	<b>Year One:</b> Percentage of high priority facilities that have a RCP on file at their location. <b>All Subsequent Years:</b> Summary of newly built or established high priority facilities during the previous year and changes made to the RCP related to newly identified facilities.
<b>Evaluation: Environmental Indicators of Effectiveness</b>	N/A
<b>Reference</b>	<b>BMP 6.04 Inlet Maintenance</b> (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.
<b>Responsible</b>	Utilities Services: Utility Plant Manager EHS: Environmental Specialist
<b>Strategy</b>	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.
<b>Measurable Goals</b>	<b>Year one:</b> 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.  <b>All Years of Permit:</b> Update the inventory of inlets and basis requiring inspection as needed; document inspection of each.
<b>Report</b>	<b>All Years of Permit:</b>  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.
<b>Evaluation: Environmental Indicators of Effectiveness</b>	Report any analytical testing done in response to inlet clean-outs
<b>Reference</b>	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.
<b>Responsible</b>	EHS: Environmental Specialist  Utilities: Utility Plant Manager
<b>Strategy</b>	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.  b) Criteria for identifying existing, un-labeled, high-priority inlets and identifying funding sources and timelines for retrofitting these with inlet awareness labels/messages.
<b>Measurable Goals</b>	<b>Year One:</b>

	<p>a) Establish acceptable means and methods for future inlet labeling and update UNL’s Design Guidelines accordingly.</p> <p>b) Establish criteria for designating existing “high risk” inlets. Inventory existing “high risk” inlets and establish a funding source and schedule for labeling.</p> <p><b>All Subsequent Years:</b> Label drains as applicable by Design Guidelines or high priority inlet schedule.</p>
<b>Report</b>	<p><b>Year One:</b> Provide a summary of inlet labeling design guidelines, and criteria used to identify existing high-priority inlets.</p> <p><b>Subsequent Years:</b> Provide a summary of changes made to the design guidelines, and status of progress in labeling of existing high-priority inlets.</p>
<b>Evaluation: Environmental Indicators of Effectiveness</b>	
<b>Reference</b>	<p>BMP 6.06 Open Drainage Maintenance</p> <p>(Part IV.B.5.d.1.c-d)</p> <p>(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.</p> <p>(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.</p>
<b>Responsible</b>	<p>Landscape Services: Assistant Director, Landscape Operations</p> <p>EHS: Environmental Specialist</p>
<b>Strategy</b>	<p>Landscape Services will visually monitor all safely accessible UNL owned open channels annually for debris and structural integrity.</p> <p>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.</p> <p>Any structural maintenance activity will be logged or forwarded to the appropriate agency, if not within the responsibility/authority of UNL.</p> <p>All inspection records will be maintained.</p>

<b>Measurable Goals</b>	<b>All Years:</b> Inspect open drainage channels annually, and maintain a log of associated maintenance activity.
<b>Report</b>	<b>All Years:</b> Percentage of scheduled vs. completed inspections.
<b>Evaluation: Environmental Indicators of Effectiveness</b>	Report any analytical results taken
<b>Reference</b>	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.
<b>Responsible</b>	EHS: Environmental Specialist
<b>Strategy</b>	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.
<b>Measurable Goals</b>	<b>Year One:</b> EHS will identify and train groups of affected employees.  <b>All Subsequent Years:</b> 1. EHS will interview O&M facility leadership groups annually. 2. EHS will review UNL's RCP annually, and update as needed. 3. EHS will distribute refresher training materials annually to affected employees, and refresher training will include any changes made to UNL's RCP.

<b>Report</b>	<ol style="list-style-type: none"> <li>1. List of O&amp;M facility leadership groups interviewed, and groups of employees receiving training.</li> <li>2. Significant changes to UNL's RCP.</li> </ol>
<b>Evaluation: Environmental Indicators of Effectiveness</b>	N/A
<b>Reference</b>	<p><b>BMP 6.08 Street Sweeping</b> (Part IV.5.d.3)</p> <p>(a) The permittee must sweep municipally owned and maintained streets, roads, and public parking lots in accordance with a strategy defined in the SWMP.</p> <p>(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.</p>
<b>Responsible</b>	<p>Landscape Services: Assistant Director of Landscape Operations</p> <p>Parking Services: Director</p>
<b>Strategy</b>	<p>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.</p> <p>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.</p> <p>Parking Services cleans all parking garages at minimum once annually using a mechanical brush vacuum assist sweeper. Liquid is not utilized in the operation of the sweeper. The filtered cleaning debris is collected in a manner not exposed to precipitation and is deposited into a permitted municipal waste landfill by Landscape Services.</p>
<b>Measurable Goals</b>	<b>All Years:</b> Clean streets and parking lots at frequency defined.
<b>Report</b>	Summarize any changes to schedule or means of disposal.
<b>Evaluation: Environmental</b>	None

<b>Indicators of Effectiveness</b>	
<b>Reference</b>	<p>BMP 6.09 Maintenance of Municipally-Owned and/or Maintained Structural Storm Water Controls</p> <p>(Part IV.5.d.4)</p> <p>(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.</p> <p>(b) The permittee must also maintain municipally owned or maintained green infrastructure practices through regularly scheduled maintenance activities.</p>
<b>Responsible</b>	<p>Utilities Service: Utility Plant Manager</p> <p>Landscape Services: Assistant Director of Landscape Operations</p> <p>EHS: Environmental Specialist</p>
<b>Strategy</b>	<p>(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.</p> <p>(b) Landscape Services will inspect all above ground green infrastructure and structural storm water controls at least annually.</p>
<b>Measurable Goals</b>	<p><b>All Years:</b> All structural and green infrastructure controls will be inspected and maintained at the required frequency.</p>
<b>Report</b>	<p>Percentage of Preventative Maintenance inspections conducted on stormwater controls.</p>
<b>Evaluation: Environmental Indicators of Effectiveness</b>	
<b>Reference</b>	<p>BMP 6.10 Training and Education</p> <p>(Part IV.5.e)</p> <p>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.</p>

<b>Responsible</b>	EHS: Environmental Specialist
<b>Strategy</b>	<p>EHS will implement its RCP training programs and include affected employees of “high risk” facilities, as well as O&amp;M employees described in BMP 6.07.</p> <p>In collaboration with management of these departments/facilities, EHS will specifically identify affected employees and update the roster of affected employees annually.</p> <p>Affected employees will receive full RCP training once and will be provided with refresher training materials annually.</p> <p>EHS will maintain training records for individual employees and records of the materials used for initial and refresher training.</p>
<b>Measurable Goals</b>	<p><b>Year One:</b> EHS will identify and deliver training to affected employees.</p> <p><b>All Subsequent Years:</b></p> <ol style="list-style-type: none"> <li>1. EHS will update the roster of affected employees at least annually and deliver full RCP training to newly identified affected employees.</li> <li>2. Refresher training materials will be provided to previously trained employees at least annually.</li> <li>3. EHS will review training materials at least annually and update as needed.</li> <li>4. 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.</li> </ol>
<b>Report</b>	<p><b>Year One:</b> Status of completion of training materials.</p> <p><b>All Subsequent Years:</b> Number of employees, by department, completing training during the reporting period.</p>
<b>Evaluation: Environmental Indicators of Effectiveness</b>	
<b>Reference</b>	<p>BMP 6.11 Contractor Requirements and Oversight (Part IV.5.f)</p> <p>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</p>

	responsible for each of the BMPs identified for this program.
<b>Responsible</b>	Leadership of the UNL department issuing the contract for work by the contactor
<b>Strategy</b>	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.
<b>Measurable Goals</b>	No illicit discharges will occur related to municipal maintenance activities conducted by outside contractors.
<b>Report</b>	Summary of nature of all illicit discharges attributed to municipal maintenance activities conducted by outside contractors during the reporting period.
<b>Evaluation: Environmental Indicators of Effectiveness</b>	None

## Appendix A – Documentation of Amendments

The University of Nebraska – Lincoln (UNL) Stormwater Management Plan (SWMP) is periodically reviewed by the UNL Environmental Health and Safety Department (EHS). The amendments to the SWMP are changes to the remedy of the original SWMP approved through public comment and NDEE review on June 29<sup>th</sup>, 2018. The changes herein were considered minor/not significant as they, maintain accuracy to current actions, improve clarity, remove redundancy, release unnecessarily restrictive content, and do not alter any measurable goals contained within the originally identified SWMP. EHS communicates changes and seeks approval with NDEE before an updated SWMP is released. Letters from NDEE approving the amendments are attached to this appendix. No public comment periods are deemed necessary for minor/ non-significant changes that amend the original SWMP. The following list outlines the notable minor/non-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 19<sup>th</sup>, 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 13<sup>th</sup>, 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 13<sup>th</sup>, 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 13<sup>th</sup>, 2019, titled, “*UNL Proposed SWMP Amendments*”.
- 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 7<sup>th</sup>, 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 14<sup>th</sup>, 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 19<sup>th</sup>, 2019, titled, "Proposed Minor Change".

- 7) *BMP 4.03 Construction Site Inspection and Enforcement* – BMP 4.03 strategy was amended to clarify the original intent of the BMP. The original language stated that, "Qualified EHS Staff will inspect permitted construction sites (a) At least 2 (two) times a year". The original language did not account for projects that begin construction near the end of the year. The amendment changes the language to, "Qualified EHS Staff will inspect permitted construction sites (a) At least 2 (two) times in every twelve-month period. The amended language better clarifies the intent of the BMP. For supporting documentation reference, the email received from NDEE on February 14<sup>th</sup>, 2022.
- 8) *BMP 4.05 Construction Site Operator Education* – BMP 4.05 strategy and report were amended to clarify the intent of the BMP. The amendment clarifies that EHS will participate in the pre-construction meetings with general contractors to discuss or provide written information that discusses their obligations under the NDEE NPDES Construction General Permit. EHS will provide either written and/or verbal instruction on where to access educational and informational materials. The report section of the BMP was similarly updated. The amended report section of the BMP causes EHS to provide contractor education materials to the general contractor in a pre-construction meeting or by written instruction. For supporting documentation reference, the email received from NDEE on February 14<sup>th</sup>, 2022.
- 9) *BMP 6.08 Street Sweeping* – In response to the NDEE Annual Report Review regarding the UNL 2022 Annual Report an adjustment was made to BMP 6.08. The adjustment reflected budgetary changes that prevented the use of the steam cleaning equipment in the parking garages. An internal review concluded that the proposed adjusted strategy maintains the protectiveness of the receiving water body to the maximum extent practicable and does not change the measurable goal or reporting requirement identified in the BMP. The BMP was then amended by removing language indicating the use of the steam cleaner with, "Parking Services cleans all parking garages at minimum once annually using a mechanical brush vacuum assist sweeper. Liquid is not utilized in the operation of the sweeper. The filtered cleaning debris is collected in a manner not exposed to precipitation and is deposited into a permitted municipal waste landfill by Landscape Services." For supporting documentation reference the email received from NDEE on August 29<sup>th</sup>, 2023.

# NEBRASKA

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RECV'D

AUG 19 2019

AUG 09 2019



Pete Ricketts, Governor

Brinda 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 VII.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](mailto:ryan.joe@nebraska.gov).

Thank you,

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

Department of Environment and Energy  
PO Box 9902  
Lincoln, Nebraska 68509-0902

Jim Macy, Director  
TEL: 402-471-2136 FAX: 402-471-2636  
[ndeq@ndehq.nebraska.gov](mailto:ndeq@ndehq.nebraska.gov)

## Patrick Boulas

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**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>

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**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

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**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>

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**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

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**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>

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**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

## Patrick Boulas

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**From:** Ducey, Patrick <patrick.ducey@nebraska.gov>  
**Sent:** Monday, February 14, 2022 4:49 PM  
**To:** Patrick Boulas  
**Cc:** Reuel Anderson; Cay Ewoldt; Lindeen, Timothy  
**Subject:** RE: UNL Minor Changes to SWMP

### Non-NU Email

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Dear Mr. Boulas,

Thank you for the question. Beginning in 2021 I no longer reviewed MS4 annual reports. That duty is now handled by the compliance section. I spoke with compliance about the annual report statuses. In the future, you can speak with Tim Lindeen, who is the inspector for Lancaster County.

However, I looked these language changes over. From what I can tell, the changes are not to any of the measurable goals. They are clarifications of language, and are approved. The change to the reporting of 4.05 still requires you to report the sites that are given information or have a meeting with UNL staff. From what I can tell, that is your method of outreach, so the reporting is anticipated to be the same.

These changes are minor, and thus do not need to be publicly noticed. Thank you for your patience with our response. Let us know if you have any questions in the future.

Sincerely,

**Patrick Ducey**  
Environmental Specialist III - NPDES Permit Writer

**Nebraska Department of Environment and Energy**  
PO Box 98922  
Lincoln, Nebraska 68509-8922  
Direct 402-471-2188

<http://dee.ne.gov/>

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**From:** Patrick Boulas <pboulas2@unl.edu>  
**Sent:** Monday, February 14, 2022 9:21 AM  
**To:** Ducey, Patrick <patrick.ducey@nebraska.gov>  
**Subject:** UNL Minor Changes to SWMP

Good morning Mr. Ducey,

I am writing to obtain your concurrence that the proposed changes below to UNL's Stormwater Management Plan are minor in nature as they clarify the intent of the original language. These were initially submitted to the department during the 2020 Annual Report but we never heard any confirmation from NDEE. Could you confirm?

- *BMP 4.03 Construction Site Inspection and Enforcement –*

- Strategy - "(a) At least 2 (two) times a year in every twelve month period;"
- *BMP 4.05 Construction Site Operator Education* –
  - Strategy - "1. EHS will continue to participate in pre-construction meetings with General Contractors to discuss or provide written information that discusses their obligations under NDEE's NPDES Construction General Permit and UNL's SMS4 NPDES permit. EHS will provide either written and/or verbal instruction on where to access educational and informational materials."
  - Report - "2. Percentage of newly permitted sites where EHS held provided contractor education materials to the General Contractor in a pre-construction meeting or by written instruction"

Thank you,  
-Patrick



**Patrick Boulas**

*Environmental Specialist - Water Quality*

University of Nebraska-Lincoln

Environmental Health & Safety

3630 E Campus Loop, Lincoln, NE 68583

[Office: \(402\) 472-2212](tel:4021472-2212)

**Patrick Boulas**

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**From:** Lindeen, Timothy <timothy.lindeen@nebraska.gov>  
**Sent:** Tuesday, August 29, 2023 7:46 AM  
**To:** Patrick Boulas  
**Subject:** RE: UNL SMS4 Annual Stormwater Report NDEE Review

**Non-NU Email**

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Mr. Boulas,

I see nothing else for you to resolve in your adjustments in the SWMP.

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**From:** Patrick Boulas <pboulas2@unl.edu>  
**Sent:** Monday, August 28, 2023 9:27 AM  
**To:** Lindeen, Timothy <timothy.lindeen@nebraska.gov>  
**Subject:** RE: UNL SMS4 Annual Stormwater Report NDEE Review

Dear Mr. Lindeen,

My apologies that I have just now found the time to circle back with you on this. I just wanted to confirm that NDEE is OK with the adjustment to the SWMP before I post it to our public website and that there is nothing else you need from us to resolve the action item in your Annual Report Review.

Sincerely,  
Patrick



**Patrick Boulas**  
*Environmental Specialist - Water Quality*  
University of Nebraska-Lincoln  
Environmental Health & Safety  
3630 E. Campus Loop, Lincoln, NE 68583  
[402-472-2212](tel:402-472-2212)

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**From:** Patrick Boulas  
**Sent:** Wednesday, July 5, 2023 10:37 AM  
**To:** Lindeen, Timothy <[timothy.lindeen@nebraska.gov](mailto:timothy.lindeen@nebraska.gov)>  
**Cc:** Brenda Osthus <[bosthus1@unl.edu](mailto:bosthus1@unl.edu)>; Taylor Bond <[tbond2@unl.edu](mailto:tbond2@unl.edu)>  
**Subject:** RE: UNL SMS4 Annual Stormwater Report NDEE Review

Dear Mr. Lindeen,

In response to the 2022 SMS4 Annual Report Review, UNL proposes to adjust the Stormwater Management Plan's BMP 6.08 Strategy regrading parking garage cleaning to the following, "Parking Services cleans all parking garages at minimum once annually using a mechanical brush vacuum assist sweeper. Liquid is not utilized in the operation of the sweeper. The filtered cleaning debris is collected in a manner not exposed to precipitation and is deposited into a permitted municipal waste landfill by Landscape Services."

An internal review concluded that the proposed adjusted strategy maintains the protectiveness of the receiving water body to the maximum extent practicable and does not change the measurable goal or reporting requirement identified in the BMP.

Per an internal request, another minor update to BMP 6.01 is requested to update the responsible department for mapping and inventory and worker title to; Operational Technology Department and Geospatial Analyst.

UNL would like NDEE's concurrence that this adjustment and update are minor in nature and do not require public notice. An updated SWMP with the changes is attached.

Thank you,  
Patrick



**Patrick Boulas**  
*Environmental Specialist - Water Quality*  
University of Nebraska–Lincoln  
Environmental Health & Safety  
3630 E. Campus Loop, Lincoln, NE 68583  
[402-472-2212](tel:402-472-2212)

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**From:** Lindeen, Timothy <[timothy.lindeen@nebraska.gov](mailto:timothy.lindeen@nebraska.gov)>  
**Sent:** Wednesday, June 21, 2023 1:30 PM  
**To:** Environmental Health & Safety <[ehs@unl.edu](mailto:ehs@unl.edu)>  
**Subject:** UNL SMS4 Annual Stormwater Report NDEE Review

**Non-NU Email**

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Dear Ms. Osthus,

Here is the review for the 2022 Annual Stormwater Report you submitted on March 28, 2023. If you have any further questions please contact with information below.

Thank you,

**Timothy Lindeen**  
Environmental Specialist II- NPDES Compliance Section

**Nebraska Department of Environment and Energy**  
245 Fallbrook Blvd.  
PO Box 98922  
Lincoln, NE 68509-8922  
Direct 402-471-2023  
[timothy.lindeen@nebraska.gov](mailto:timothy.lindeen@nebraska.gov)