

March 12, 2026

Nebraska Department of Water, Energy, and Environment  
Wastewater Section  
P.O. Box 98922  
Lincoln, NE 68509-8922

Re: 2025 SMS4 Annual Report  
UNL City Campus and East Campus  
Facility ID: 58075 & 58076  
NPDES Permit: NER310000

Dear Mesdames and Sirs:

Please find enclosed the 2025 Stormwater Annual Report for the above-referenced facilities. As per the permit, Part VI., Section A, this Annual Report covers the nineteenth year of activities (January – December 2025). The attached documents summarize the information required, as listed in Part VI., Section A, of the permit. NPDES Permit NER310000 expired 06/30/2022; however, UNL will continue to coordinate all Storm Water Management Plan activities during which time the agency promulgates a new permit.

If you would like additional information regarding this Annual Report, please contact the EHS office at 402-472-4925.

#### Certification

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

Brenda K. Osthus, Director  
Environmental Health & Safety

Encl.

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**University of Nebraska-Lincoln**  
**2025 Annual Report**

NPDES Permit: NER 310000 (sMS4)

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>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>At least annually, review and update storm water educational information contained on EHS's web site.</li> <li>At least annually, sponsor a storm water awareness booth at a large student event.</li> <li>At least annually, publish a storm water awareness article in the EHS list serve.</li> </ol> <p>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.</p>	
<b>Report</b>	<ol style="list-style-type: none"> <li>Date, nature of the large student event(s) with an EHS sponsored booth, estimated number of students that</li> </ol>	<ol style="list-style-type: none"> <li>On 1/30/2025, the EHS Specialist presented a class lecture to students taking a Science, Systems, Environment &amp; Sustainability class. The lecture and Q&amp;A lasted an hour and</li> </ol>

	<p>visited the booth, and summary of relevant information presented/distributed (during the prior year).</p> <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>	<p>fifteen minutes with an audience of 18 students. The presentation discussed the MS4 permitting structure, UNL Stormwater Management Plan, Illicit Discharged, Water Quality and Water Quantity Standards, the various minimum control measures and examples of Post Construction Stormwater Control on campus. On 9/17/2025 the Assistant Director of EHS presented to students taking an Environmental Engagement and the Community class. The class conducted a walkabout on east campus to present and discuss different Stormwater Controls on campus with 12 students. The presentation lasted an hour and fifteen minutes and discussed different stormwater control while focusing on Stormwater Management, Post Construction Stormwater Controls, Illicit discharge reporting and the NPDES program. The class came up with 38 questions in response to the lecture that were answered after class. Following this lecture the class selected the EHS Stormwater Program to be a mentor to a group in the same class. The EHS specialist worked with this group for two months to develop a plan to implement a stormwater control and create a hydraulic flood map for a location on city campus. On 12/11/2025 the group presented their project to the class and held a poster showcase. On 7/12/2025 the EHS specialist attended the East Campus Discovery Days &amp; Farmers Market to educate the students and surrounding community of the Stormwater Management Program, illicit Discharge reporting, different types of soil run off and construction sediment and erosion control measures. The booth also presented a poster that explained the UNL Stormwater Management Plan. The fair lasted three hours with around 200 people walking by and discussing the program. On 9/17/2025 EHS sponsored a booth at the Safety Fair hosted by UNL PD to educate students about the Stormwater Program website and pollution reporter. The EHS specialist presented a poster and discussed</p>
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what students could do to support the program. The poster explains the UNL Stormwater Management Plan, presents examples of Best Management Practices used by UNL, and has a QR code for quick access to the Stormwater Pollution Reporter Tool. The booth also handed out Stormwater Management Plan pamphlets with education material and link to the Stormwater Pollution Reporter Tool. The specialist engaged with approximately 100 students. On 10/21/2025 EHS sponsored a booth at the Employee Wellness and Community Resource Fair to educate UNL employees and student workers about the Stormwater Management Plan. The event lasted three hours. The EHS specialist presented a poster and discussed with staff and student's different types of pollution and how to report Stormwater issues. The booth also handed out education pamphlets about the UNL Stormwater Management Program. Our booth estimated that around 200 employees/student workers engaged in the booth and discussed the program.

2. EHS distributed two listserv articles in 2025; 04/03/2025 listserv article titled, "Stormwater – UNL Management Plan & 2024 Report", and on 11/05/2025 with a listserv article titled, "Have you Seen the Green Infrastructure Map?". Each listserv article distributed contained either a link to the stormwater management website, the online pollution reporter tool or both. The EHS Listserv was sent to approximately 1,965 recipients.
3. In 2025, the following updates and changes were made to the EHS Stormwater Management website: 2024 Annual Report; 2025 storm sewer maps that include waters of the state, storm sewer outfall locations, and Post-Construction Stormwater Control type and location; links to the PCSWC Story Map, and the DWEE website for Storm Water Discharges from Construction Sites permits. The Virtual Green Infrastructure video has 62

		<p>views, and the PCSWC Story Map counted 704 views in 2025.</p> <p>4. During calendar year 2025, two thousand three hundred and sixty-seven (2367) people completed EHS Injury and Illness Prevention Training, which contains general stormwater awareness information. Additional Stormwater related training is described in MCM 3 and MCM 6. EHS sends out a new employee greeting to all newly hired employees every month. The EHS greeting email references the EHS website, stormwater management plan, required employee training, and the online stormwater reporter tool. EHS greetings were sent to 639 new employees in 2025.</p>
<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> <p>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.</p>	
<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> </ol> </li> </ol>	

	<p>c. Soliciting comments and suggestions at meetings of the Chancellor’s University Safety Committee, which has broad faculty and staff representation.</p> <p>d. Soliciting comments and suggestions by sending written notice to or attending a meeting of ASUN (Student Government)</p> <p>EHS will announce publication of its annual report and solicit feedback using the same mechanisms described above.</p>	
<p><b>Measurable Goals</b></p>	<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 comments 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> </ol> <p>UNL’s most current SMS4 permit and SWMP will be available on the EHS web site for public viewing throughout the permit term.</p>	
<p><b>Report</b></p>	<p>Summary of public notices, including date, content, and mechanisms of distribution. Documentation of all comments and responses will be available upon request.</p>	<ol style="list-style-type: none"> <li>1. In 2025, no significant changes were made to the SWMP. The 2024 annual report was submitted to NDEE and posted on the stormwater website. A link to submit comments on UNL’s SWMP was maintained throughout the year. To date, no public comments have been received. The online stormwater pollution reporter tool was maintained on the website throughout the year. DWEE’s General permit and factsheet were published on the EHS website upon notice of acceptance of UNL’s SWMP in 2018 and have remained unchanged through 2025.</li> <li>2. Solicitations for review and comment on UNL’s 2024 Annual Report and Stormwater Management plan were made in 2025 as follows: An email notification for comment was sent to ASUN Student Government on 03/21/2025; notice for comment was published in the EHS Listserv on 04/03/2025 for the campus</li> </ol>

		<p>community; on 05/21/2025, the Chancellor’s University Safety Committee was alerted that the 2024 Annual Stormwater Report was posted to the EHS website and open for public review and comment. No responses were received regarding the 2024 Annual Report in 2025 by the campus community.</p> <p>There were no updates or changes to UNL’s SWMP in calendar year 2025. The SMS4 permit and SWMP were available on the EHS website throughout 2025.</p>
<b>Evaluation: Environmental Indicators of Effectiveness</b>	N/A	

Requirement: MCM 3 Illicit Discharge Detection Elimination		
<b>Reference</b>	BMP 3.01 Enforcement Plan (Part IV.B.2.a.1.a)  a. The permittee must, as part of the IDDE program, develop an enforcement plan or mechanism following the requirements of <b>Parts III.A</b> and <b>B</b> of this permit.	
<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.	No circumstances occurred in calendar year 2025 that required implementation of the Enforcement Response Plan. UNL’s current Enforcement Response Plan was reviewed on 12/2025. The review determined that no significant changes were needed to the plan.
<b>Evaluation: Environmental Indicators of Effectiveness</b>	N/A	

<b>Reference</b>	<b>BMP 3.02 Mapping</b> (Part IV.B.2.a.1.b): The IDDE program must include map or address: b. A storm sewer system map showing the location of all outfalls and the names and location of all waters of the state that receive discharges from those outfalls. If the SMS4 system connects to another MS4 system, the outfall drainage areas can be limited to those that drain only to the permittee’s system. Connections and interactions with other MS4 systems need to be delineated.	
<b>Responsible</b>	Operational Technology Department: Geospatial Analyst	
<b>Strategy</b>	The Geospatial Analyst 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 Geospatial Analyst 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.	No reporting required. The most current storm sewer system map located on the EHS website showing the location of all outfalls and waters of the state that receive discharges was uploaded to the stormwater management website on 03/10/2025. Continuously updated maps are located within UNL’s online proprietary GIS software.
<b>Evaluation: Environmental Indicators of Effectiveness</b>	N/A	
<b>Reference</b>	<b>BMP 3.03 Dry-Weather Field Screening</b> (Part IV.B.2.a.1.c): The IDDE program must include or address: c. Outfall field screening procedures and priority locations to investigate for detecting illicit discharges. <ol style="list-style-type: none"> <li>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;</li> <li>II. The screening procedures must identify the minimum staff, equipment, and discharge evaluation process used by the permittee; and</li> </ol>	

	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.		
<b>Responsible</b>	EHS: Environmental Specialist		
<b>Strategy</b>	<p>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.</p> <p>A current map listing all qualifying outfalls will continue to be maintained, as described in BMP 3.02.</p>		
<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>	<table border="1"> <tr> <td> <p>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.</p> <p>2. Provide a summary of illicit discharges identified through dry weather monitoring during the prior year's inspections.</p> </td> <td> <p>1. 100% of qualified outlets were inspected during calendar year 2025 in accordance with the IDDE written procedures. A total of 52 outfalls were identified and inspected in the 2025 IDDE Dry Weather Field Screening.</p> <p>2. No illicit discharges were identified during the 2025 dry weather inspections of outfalls.</p> </td> </tr> </table>	<p>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.</p> <p>2. Provide a summary of illicit discharges identified through dry weather monitoring during the prior year's inspections.</p>	<p>1. 100% of qualified outlets were inspected during calendar year 2025 in accordance with the IDDE written procedures. A total of 52 outfalls were identified and inspected in the 2025 IDDE Dry Weather Field Screening.</p> <p>2. No illicit discharges were identified during the 2025 dry weather inspections of outfalls.</p>
<p>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.</p> <p>2. Provide a summary of illicit discharges identified through dry weather monitoring during the prior year's inspections.</p>	<p>1. 100% of qualified outlets were inspected during calendar year 2025 in accordance with the IDDE written procedures. A total of 52 outfalls were identified and inspected in the 2025 IDDE Dry Weather Field Screening.</p> <p>2. No illicit discharges were identified during the 2025 dry weather inspections of outfalls.</p>		
<b>Evaluation: Environmental Indicators of Effectiveness</b>	None		
<b>Reference</b>	<p>BMP 3.04 Illicit Discharge Investigation and Response</p> <p>(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>	<p>1. EHS will continue to investigate all identified and reported illicit discharges and conduct appropriate follow-up investigations and actions in accordance with UNL's IDDE written procedures (which include all regulatory requirements described in Part IV.B.2.a.1.d &amp; e of the General Permit) and as described in the narrative for this MCM.</p> <p>EHS will implement its Enforcement Response Plan as described in BMP 3.01.</p>	
<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>	<p>Summarize nature of each illicit discharge identified during the previous year and actions taken to eliminate the discharge.</p>	<p>During calendar year 2025, one (1) illicit discharge was identified.</p> <p>The illicit discharge was identified by an EHS employee at the East Campus Utility Plant after noticing water being discharged from back door of utility plant. The illicit discharge was identified, after interviewing utility plant staff, as neutralized and diluted sulfuric acid wastewater from a secondary containment. The discharge was observed, by a staff member, traveling to the nearby intersection and then down the street towards a storm sewer inlet. EHS arrived after the discharge to the nearby inlet. The discharge had predominately ceased and a white stain on the concrete surface was developing. EHS obtained a sample from the water that was still in the street near inlet. The pH was measured at 5 by a test strip. The discharge ran through approximately 1,500 ft of stormwater conveyance. EHS located the outlet</p>

		<p>structure for this storm sewer inlet and attempted to collect water sample where the storm sewer discharged into Deadman’s Run, but there was not a sufficient amount of water to collect for a sample. No impact or evidence of discharge to Deadman’s Run was observed. Refresher training material was supplied to emphasize the prevention of non-stormwater discharges into a storm sewer conveyance. Utility Plant staff are instructed to dispose of cooling tower wastewater and neutralized secondary containment sulfuric acid wastewater in their infiltration trenches around the plant or directly into a sanitary sewer, as long as the solution is approved to be sewer disposed.</p>
<p><b>Evaluation: Environmental Indicators of Effectiveness</b></p>	<p>Report any analytical data obtained to characterize illicit discharges detected during the previous year.</p> <p>No lab analytics were collected in 2025, therefore there is no data to report.</p>	
<p><b>Reference</b></p>	<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> <p>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</p>	

	<p>these discharges to your MS4.</p> <p>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 are determined to be contributing significant amounts of pollutants to your MS4.</p>	
<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.</p> <p><b>Local Controls:</b></p> <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.</p>	
<b>Measurable Goals</b>	<p><b>All Years:</b></p> <p>None.</p>	
<b>Report</b>	Any changes to local controls.	No significant changes to local controls occurred in 2025.
<b>Evaluation: Environmental Indicators of Effectiveness</b>	<p>Report all analytical sampling data generated from incidental discharges from the previous year, if analytical testing is conducted.</p> <p>Samples from incidental non-stormwater discharges were not collected in 2025, therefore there is no data to report.</p>	
<b>Reference</b>	<p>BMP 3.06 Adjacent MS4 Cooperation (Part IV.B.2.a.2&amp;3)</p> <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>	<p>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.</p> <p>EHS will investigate all reports of suspected illicit discharges received from the City of Lincoln, in accordance with UNL's IDDE investigation procedures.</p>	
<b>Report</b>	<p>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.</p>	<p>No potential or illicit discharges were reported to UNL by the City in 2025. No potential illicit discharges were reported to the City of Lincoln by UNL in 2025. EHS held a meeting with the City of Lincoln Watershed Management Department to discuss adjacent MS4 coordination and Stormwater Management Plan requirements.</p>
<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> </ol>	

	UNL's IDDE procedure addresses tracking, investigation, and follow up on all reports of illicit discharges.	
<b>Measurable Goals</b>	<b>All Years:</b> 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.	
<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>	<ol style="list-style-type: none"> <li>1. EHS received one (1) public complaint in 2025. EHS investigated and deemed the report as not an illicit discharge. EHS took timely action to notify the party responsible to prevent potential illicit discharges.  The one complaint we received was on 4/24/2025, The report referenced standing water within the Legacy Meadows Phase 2 project. This site was an active construction site. The report identified a couple of areas within the construction site that had pooling water. The contractors have just graded the site and planted trees with sod. The contractor hired a separate crew to water the newly planted tree and sod. Because of how the site was graded, multiple spots had pooling water which led to a public complaint. EHS notified the contractor who promptly reduced their watering frequency, and they are planning on returning to regrade the site. No discharge to the storm sewers occurred as the pooling water was contained on site.</li> <li>2. No substantial changes were made to UNL's IDDE procedure in 2025.</li> </ol>
<b>Evaluation: Environmental</b>	Report analytical results of water quality sampling conducted in response to illicit discharge investigations, if conducted.	

<b>Indicators of Effectiveness</b>	No analytical results of water quality sampling were conducted in response to illicit discharge investigations from public reporting incidents.	
<b>Reference</b>	<p><b>BMP 3.08 Illicit Discharge Education and Training</b> (Part IV.B.2.c)</p> <p>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.</p> <p>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.</p>	
<b>Responsible</b>	EHS: Stormwater Specialist	
<b>Strategy</b>	<p>1. EHS will implement a field staff illicit discharge detection training program.</p> <p>2. Target Audience: appropriate employees that are beyond the scope of MCM 6 training, within EHS, Utilities, Landscape Services, and Building Maintenance Departments.</p> <p>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.</p> <p>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.</p>	
<b>Measurable Goals</b>	<p><b>Year One:</b></p> <ol style="list-style-type: none"> <li>Identify field staff that are required to participate in the training.</li> <li>Deliver training to field staff.</li> </ol> <p><b>All Subsequent Years:</b></p> <ol style="list-style-type: none"> <li>Design refresher training materials and distribute to previously trained staff.</li> </ol> <p>Deliver training to newly hired field staff.</p>	
<b>Report</b>	<ol style="list-style-type: none"> <li>Number of newly trained staff, by department.</li> <li>Number of staff receiving refresher training, by department.</li> </ol>	<ol style="list-style-type: none"> <li>During calendar year 2025, EHS delivered initial stormwater awareness training to a total of seventy-eight (78) applicable staff. The following departments were subject to completing initial</li> </ol>

		<p>training for new staff: Animal Science, Building Systems Maintenance, Nebraska Union, Facilities Planning and Capital Programs, Athletics, Campus Recreation, EHS, Housing, Landscape Services, Transportation Services, Utility Services, and Sustainability. The initial training that was delivered to the above departments included in-person or online training modules.</p> <p>2. During calendar year 2025, EHS designed and delivered stormwater awareness refresher training to a total of one hundred and eighty-five (185) UNL staff representing the following departments: Animal Science, Athletics, Building Service Maintenance, Campus Recreation, EHS, Facilities Planning and Capital Programs, Housing, Landscape, Nebraska Union, Transportation Services, Utility Services, and Sustainability.</p> <p>Additionally, EHS coordinated a targeted online training related to an illicit discharge for the Utility Services department. A total of seventeen (17) Utility Services Staff completed the online training through the EHSA website.</p>
<p><b>Evaluation: Environmental Indicators of Effectiveness</b></p>	<p>N/A</p>	

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 and B</b> of this permit</p>
<b>Responsible</b>	EHS: Environmental Specialist
<b>Strategy &amp; Measurable Goals</b>	See BMP 3.01. UNL's enforcement response plan addresses construction sites.
<b>Report</b>	See BMP 3.01
<b>Evaluation: Environmental Indicators of Effectiveness</b>	None
<b>Reference</b>	<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 meet 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 plans using a checklist or similar process.</li> <li>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.</li> </ol>
<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 or equivalent, 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>	<p>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.</p>	<p>EHS reviewed and approved the Erosion and Sediment Control Plan for all (100%) new construction sites subject to NDEE’s construction general permit that began construction in 2025.</p> <p>A total of one (1) construction site NOIs was reviewed in 2025.</p> <p>UNL Rodeo &amp; Equine Sports Complex – EHS approved SWPPP after review was completed on 11/11/2025.</p>
<b>Evaluation: Environmental Indicators of Effectiveness</b>	<p>N/A</p>	
<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:</li> </ol>	

	<ul 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 thorough site inspection to determine if control measures have been selected, installed, implemented, and maintained according to the plan;</li> <li>(c) Assess compliance with the permittee’s ordinances and permits related to storm water runoff, including the implementation and maintenance of designated MCM;</li> <li>(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;</li> <li>(e) Provide education and outreach on storm water pollution prevention, as needed; and</li> <li>(f) Provide a written or electronic inspection report generated from findings in the field.</li> </ul> <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> <ul style="list-style-type: none"> <li>(a) At least 2 (two) times a year in every twelve-month period;</li> <li>(b) Upon report of a concern;</li> <li>(c) When needed to verify correction of deficiencies identified during a previous inspection.</li> </ul> <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>	<p><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.</p>

<p><b>Report</b></p>	<ol style="list-style-type: none"> <li>1. Percentage of permitted sites that EHS inspected at the targeted frequency.</li> <li>2. Summary of substantial changes made to the written construction site inspection procedures during the prior year.</li> </ol>	<ol style="list-style-type: none"> <li>1. During 2025, all (100%) of the permitted construction sites were inspected by EHS at the targeted frequency described in the strategy. The following permitted sites were subject to construction stormwater inspections throughout CY 2025: Husker Practice Fields was inspected on 05/07/2025 and NOT submitted prior to fall inspection period; CRES Distribution submitted an NOT on 07/14/2025 prior to fall inspection period; Neihardt Piper submitted an NOT on 05/09/2025 prior to fall inspection period. Outdoor Track phase 2 was inspected on 05/08/2025 and 12/04/2025; Legacy Meadows phase 2 was inspected on 05/12/2025 and 12/12/2025; Westbrook Music Hall was inspected on 04/30/2025 and 11/12/2025 with a conditional inspection on 08/20/2025 with the State inspectors; and lastly UNL Rodeo &amp; Equine Sports Complex had opened permit at the end of 2025 with first inspection on 12/11/2025.</li> <li>2. No substantial changes were made to the construction site inspection procedures in 2025.</li> </ol>
<p><b>Evaluation: Environmental Indicators of Effectiveness</b></p>	<p>NA</p>	
<p><b>Reference</b></p>	<p><b>BMP 4.04 Staff Training</b> (Part IV.B.3.e)</p> <ol style="list-style-type: none"> <li>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.</li> </ol>	

<b>Responsible</b>	EHS: Environmental Specialist	
<b>Strategy</b>	At a minimum, assigned staff will have a bachelor’s degree or equivalent, 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>	<b>All Years</b> EHS will maintain training records for all persons authorized to implement BMP 4.02 or 4.03.	
<b>Report</b>	Names of staff persons assigned responsibilities under BMP 4.02 and 4.03 and a summary of their qualifications.	The following individuals were assigned responsibilities under BMP 4.02 and 4.03 in 2025: Brenda Osthus, Patrick Boulas, and Macrae Zappala. See Attachment B for a summary of each person’s qualifications. Each person meets or surpasses the minimum qualifications to conduct the activities defined in BMP 4.04.
<b>Evaluation: Environmental Indicators of Effectiveness</b>	N/A	
<b>Reference</b>	<p>BMP 4.05 Construction Site Operator Education (Part IV.B.3.f.1)</p> <ol style="list-style-type: none"> <li>1. The permittee must make publicly available educational materials to construction site operators in a strategy outlined in the SWMP. <ol style="list-style-type: none"> <li>(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.</li> <li>(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.</li> <li>(c) The permittee must make available appropriate outreach materials to all construction operators who will be disturbing land within the MS4 boundary.</li> <li>(d) The permittee must provide information on the installation and maintenance of controls on the permittee’s website or made publicly accessible by whichever methods and procedures are determined appropriate by the permittee and approved by the NDEE.</li> </ol> </li> </ol>	

<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 either written and/or verbal 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 provided contractor education materials to the general contractor in a pre-construction meeting or by written instruction.</li> </ol>	<ol style="list-style-type: none"> <li>1. The following resources were maintained on the EHS website in 2025: A guide to Construction Storm Water (CSW) Permitting at UNL; City of Lincoln – stormwater post construction best management and chapter 8 stormwater best management practices; NDOT environmental section and stormwater best management practices pocket guide; Omaha stormwater program, erosion and sediment control pocket guide, stormwater best management practices, and construction site requirements. During 2025, EHS sent education materials directly to the contractor representative during the time the CSW was approved. The contractor education</li> </ol>

		<p>pamphlet that is sent to contractors references the UNL Stormwater website, information about EHS led stormwater inspections, education on terminating the construction stormwater permit, and advises the contractor about prohibited stormwater discharges and content on spill notification.</p> <p>2. (100%). One (1) newly permitted construction site was approved in 2025. This site received a contractor education pamphlet through email and in person when the SWPPP was approved.</p>
<b>Evaluation: Environmental Indicators of Effectiveness</b>	N/A	
<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 in the Illicit Discharge</li> </ol>	

	<p>Detection &amp; Elimination Response procedure that is publicly available on the EHS website's stormwater management page.</p> <ol style="list-style-type: none"> <li>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>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.	In 2025, EHS received no public complaints regarding permitted construction sites. EHS also received no complaints through the online reporter tool or through contacting the EHS office.
<b>Evaluation: Environmental Indicators of Effectiveness</b>	<p>Report any water quality sampling done in response to public reporting.</p> <p>No water quality sampling was performed in response to a public complaint, therefore there is no data to report.</p>	

Requirement: MCM 5 Post Construction Management Program	
<b>Reference</b>	<p>BMP 5.01 Site Performance Standards (Part IV.B.4.b)</p> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> </ol>
<b>Responsible</b>	EHS: Environmental Specialist
<b>Strategy</b>	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.	
<b>Measurable Goals:</b>	<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>	
<b>Report</b>	Report any changes to performance standards made during the preceding year.	In 2025, the existing performance standards were maintained. A stakeholder meeting was held on 12/17/2025 to discuss UNL's design guidelines and gain feedback about program. The standards remained the same as the previous year, and meeting concluded with no changes to the performance standard or design guidelines. No feedback received.
<b>Evaluation: Environmental Indicators of Effectiveness</b>	NA	
<b>Reference</b>	<p>BMP 5.02 Post-Construction Site Plan Review (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 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>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>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>	<b>All Years:</b>	All (100%) of the applicable construction projects submitted PCSWC

	<p>1. Percentage of applicable construction projects initiated in the prior year that were reviewed and approved.</p>	<p>plans for review in 2025. EHS reviewed and approved all PCSWC plan submittals in accordance with UNL EHS written procedures.</p> <p>Legacy Meadows Phase 2 – The PCSWC Review form was reviewed and approved as meeting the stormwater performance standards in 2023. The project is currently under construction and plans have changed to remove a section of the PCSWC originally to be installed. The new PCSWC Review form was reviewed and approved to meet site standard in May of 2025.</p> <p>UNL Rodeo &amp; Equine Sports Complex – A construction design regarding the sites PCSWC features and stormwater standard was reviewed and approved in April of 2025.</p> <p>Westbrook Music Hall – A construction design regarding the sites PCSWC features and stormwater standards was reviewed and approved in 2023. In 2024 the PCSWC review form was submitted and approved by the EHS department. The project is still under construction and no modifications to the approved plan are projected currently.</p> <p>The following construction projects are still in a construction phase where the PSCWCs have been previously approved. Westbrook Music Hall, Legacy Meadows Phase 2 and UNL Rodeo &amp; Equine Sports Complex. These projects will be inspected per BMP 5.04 accordingly.</p> <p>Lied Center for Performing Arts will be a 0.75 acres project that sent in a PCSWC Design Review Waiver form in July of 2025 due to utility constraints. There are no other new construction projects between 0.5 and 1.0 acre that were</p>
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		initiated in 2025 that required PCSWCs review and approval.
<b>Evaluation: Environmental Indicators of Effectiveness</b>	none	
<b>Reference</b>	<p>BMP 5.03 As-Builts (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>	<p>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.</p>	
<b>Measurable Goals</b>	<p><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.</p>	
<b>Report</b>	<p><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.</p>	<p>All (100%) applicable projects completing construction in the previous year that are no longer in the contractor warranty period have relevant as-built information on file.</p> <p>No projects have submitted as-built drawings in 2025. As-Builts will be supplied for the Legacy Meadows, Westbrook Music Hall and UNL Rodeo &amp; Equine Sports Complex once construction is complete.</p>
<b>Evaluation: Environmental Indicators of Effectiveness</b>	none	

<b>Reference</b>	<b>BMP 5.04 Installation Inspections</b> Part IV.B.4.d.1: 1) Procedures must be established to ensure 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.	All (100%) of construction projects that were completed in 2025 were subject to an EHS field installation inspection. Each project obtained a substantial completion certificate where the A/E and contractor verified the stormwater control complies with the approved design.  EHS field inspected the following projects before completion to ensure each PCSWC adhered to the approved stormwater performance standards contained in UNL’s design guideline: Legacy Meadows Phase 2 is still under construction. One of the bioretention basins was installed incorrectly and A/E are in the process of correcting the issues. No other projects completed in

		2025 that required PCSWC installation inspections.
<b>Evaluation: Environmental Indicators of Effectiveness</b>	None	
<b>Reference</b>	<p>BMP 5.05 Public Reporting (Part IV.B.4.d.2)</p> <p>2) The permittee must establish procedures to respond to complaints and notifications to ensure the long-term maintenance of structural controls.</p>	
<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>	<p><b>All Years:</b></p> <ol style="list-style-type: none"> <li>1. EHS will continue to maintain the public reporting mechanism, Stormwater Reporter, on the EHS web page.</li> <li>2. EHS will maintain our procedure for reporting suspected maintenance issues using the Illicit Discharge Detection and Elimination procedure that is publicly available on EHS's website Stormwater Management page.</li> <li>3. EHS will respond to all public complaints and summarize the nature of each complaint and EHS follow-up actions in the annual report.</li> </ol>	
<b>Report</b>	<p><b>All Years:</b></p> <ol style="list-style-type: none"> <li>1. Number and summary of complaints received and follow-up actions.</li> <li>2. Summary of any changes to related procedures resulting from a complaint.</li> </ol>	EHS did not receive any public complaints regarding post-construction BMP maintenance in calendar year 2025. No follow-up actions or changes to procedures were applicable.
<b>Evaluation: Environmental Indicators of Effectiveness</b>	<p>Report any water quality sampling done in response to public reporting.</p> <p>Not applicable</p>	
<b>Reference</b>	BMP 5.06 Tracking Post-Construction Storm Water Control Measures (Part IV.B.4.e)	

	<ol style="list-style-type: none"> <li>1. The permittee must maintain a current inventory of certified post-construction structural storm water control measures installed and implemented at new development and redeveloped sites, including both public and private sector sites located within the permit area.</li> <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>	EHS: Environmental Specialist Operational Technology Department: Geospatial Analyst	
<b>Strategy</b>	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.	
<b>Measurable Goals</b>	<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.	
<b>Report</b>	<b>All Years:</b> <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>	All (100%) PCSWCs of newly developed and redeveloped sites completed during the previous year were inventoried on UNL's GIS System in 2025. Two (2) PCSWC were nearing completion during 2025; two (2) bioretention basins (Legacy Meadows Phase 2), and one turf field and bioretention basins (Westbrook Music Hall) were all added to the PCSWC inventory and UNL's GIS database in anticipation of completion.
<b>Evaluation: Environmental Indicators of Effectiveness</b>	None	

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>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">The GIS map will be available for review by the permitting authority upon request. No reporting.</td> <td>UNL GIS maps are up-to-date and available upon request.</td> </tr> </table>	The GIS map will be available for review by the permitting authority upon request. No reporting.	UNL GIS maps are up-to-date and available upon request.
The GIS map will be available for review by the permitting authority upon request. No reporting.	UNL GIS maps are up-to-date and available upon request.		
<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>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>A list of newly identified “high priority” facilities made during the reporting period will be included in the annual report.</li> </ol>	<ol style="list-style-type: none"> <li>No significant changes were made in the previous year to UNL’s assessment strategy for designating “high priority” facilities in 2025.</li> <li>A New Facility Assessment resulted in no new High-Risk Facilities being added in 2025.</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.  (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.  (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>	<p><b>Year One:</b> EHS will ensure that a copy of UNL’s RCP is on file at each high priority facility.</p> <p><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.</p>	
<b>Report</b>	<p><b>Year One:</b> Percentage of high priority facilities that have a RCP on file at their location.</p> <p><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.</p>	<p>UNL’s Runoff Control Plan was distributed to the managers of all (100%) of the High Priority Facilities at UNL City and East Campus in Year 1.</p> <p>No newly identified High Priority Facilities resulted from the 2025 UNL Facility Assessment. No significant change to the Runoff Control Plan was warranted.</p> <p>Pursuant to the Runoff Control Plan, EHS inspected every high priority facility for adherence to the plan and other good housekeeping and pollution prevention measures in 2025. Copies of inspection records are on file.</p>
<b>Evaluation: Environmental Indicators of Effectiveness</b>	N/A	
<b>Reference</b>	<p>BMP 6.04 Inlet Maintenance (Part IV.B.5.d.1.a&amp;e)</p> <p>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.</p>	
<b>Responsible</b>	<p>Utilities Services: Utility Plant Manager</p> <p>EHS: Environmental Specialist</p>	
<b>Strategy</b>	<p>Utilities Services and/or EHS staff will inspect and clean UNL owned inlets and catch basins under the following strategy:</p> <ol style="list-style-type: none"> <li>Catch basins will be inspected annually and cleaned as needed.</li> </ol>	

	<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> </ol> <p>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.</p>	
<p><b>Measurable Goals</b></p>	<p><b>Year one: Establish</b> 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.</p> <p><b>All Years of Permit:</b> Update the inventory of inlets and basis requiring inspection as needed; document inspection of each.</p>	
<p><b>Report</b></p>	<p><b>All Years of Permit:</b></p> <ol style="list-style-type: none"> <li>1. Percentage of inlets/basins scheduled for inspection with completed inspections.</li> <li>2. Number of basins/inlets inspected where corrective action was needed, and a summary of actions taken.</li> </ol>	<ol style="list-style-type: none"> <li>1. UNL Utility Services has not identified any underground structures on City or East Campus that would be classified as a catch basin. Utility Services will continue to monitor newly installed structures and inventory any that are classified as a catch basin for future inspection.</li> </ol> <p>All (100%) of inlets located 100' down gradient of a permitted construction project that filed for an NOT in 2025 were inspected. The three (3) construction projects that filed NOTs in 2025 are as follows: Neihardt Piper, Husker Practice Fields, and CRES Distribution. All (100%) Inlets associated with an illicit discharge reported in 2024 have been inspected by EHS in 2025. All (100%) Inlets associated with clogging or maintenance issues in</p>

		<p>2024 have been inspected in 2025.</p> <p>2. In 2025, none of the inlets that were inspected as part of this BMP required corrective action. No action was deemed necessary.</p>
<b>Evaluation: Environmental Indicators of Effectiveness</b>	<p>Report any analytical testing done in response to inlet clean-outs</p> <p>No analytical testing was conducted.</p>	
<b>Reference</b>	<p>BMP 6.05 Inlet Awareness Labels (Part IV.B.5.d.1.b)</p> <p>b. The permittee must have a plan to label inlets with a legible storm water awareness message.</p>	
<b>Responsible</b>	<p>EHS: Environmental Specialist</p> <p>Utilities: Utility Plant Manager</p>	
<b>Strategy</b>	<p>EHS will meet with the campus stakeholder group (described in MCM 3 &amp; 5) to evaluate/determine:</p> <p>a) Current design guidelines regarding inlet labels and address any changes deemed necessary to be applied to future projects.</p> <p>Criteria for identifying existing, un-labeled, high-priority inlets and identifying funding sources and timelines for retrofitting these with inlet awareness labels/messages.</p>	
<b>Measurable Goals</b>	<p><b>Year One:</b></p> <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,</p>	<p>The design guidelines for UNL reference City of Lincoln design criteria for installation of inlet awareness labels for new construction.</p> <p>There were no changes to the design guidelines regarding stormwater</p>

	and status of progress in labeling of existing high-priority inlets.	awareness labels in 2025. All areas designated as “high risk” in year one have been surveyed and all are considered labeled and meeting the objectives of this BMP.
<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>	<p><b>All Years:</b> Inspect open drainage channels annually and maintain a log of associated maintenance activity.</p>	
<b>Report</b>	<p><b>All Years:</b> Percentage of scheduled vs. completed inspections.</p>	<p>All (100%) of UNL owned/maintained open channels on City, East and Innovation campus were inspected in 2025.</p>

<b>Evaluation: Environmental Indicators of Effectiveness</b>	Report any analytical results taken. No analytical samples were taken.	
<b>Reference</b>	<p>BMP 6.07 Municipal Activities and Operations</p> <p>(Part IV.B.5.d.2)</p> <p>(a) The permittee must implement a set of pollution prevention measures that, when applied during municipal O&amp;M activities, will reduce the discharge of pollutants in storm water.</p> <p>(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.</p>	
<b>Responsible</b>	EHS: Environmental Specialist	
<b>Strategy</b>	<p>Groups of employees that work within O&amp;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.</p> <p>EHS will interview O&amp;M facility leadership annually to ensure that they are adhering to pollution prevention measures and maintain associated documentation.</p>	
<b>Measurable Goals</b>	<p><b>Year One:</b></p> <p>EHS will identify and train groups of affected employees.</p> <p><b>All Subsequent Years:</b></p> <ol style="list-style-type: none"> <li>1. EHS will interview O&amp;M facility leadership groups annually.</li> <li>2. EHS will review UNL's RCP annually, and update as needed.</li> </ol> <p>EHS will distribute refresher training materials annually to affected employees, and refresher training will include any changes made to UNL's RCP.</p>	
<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>	<ol style="list-style-type: none"> <li>1. The following departments' facility leadership was interviewed in 2025: Athletics, Building Systems Maintenance, Campus Recreation, Nebraska Union, Facilities Planning &amp; Capital Programs, Sustainability Department, and University</li> </ol>

		<p>Housing. All employees identified at these departments whose work scope could adversely affect stormwater received initial or refresher stormwater awareness training in 2025. For a complete list of departments trained in 2025 refer to BMP 3.08.</p> <p>2. A review of the Runoff Control plan occurred in 2025. The review corresponds to water quality issues and concerns with the good housekeeping measures outlined in the RCP. The review confirmed that appropriate control measures within the RCP are present. No significant changes to the Runoff control plan occurred in 2025.</p>
<b>Evaluation: Environmental Indicators of Effectiveness</b>	N/A	
<b>Reference</b>	<p>BMP 6.08 Street Sweeping (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 is 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.	No changes were made to the schedule or means of disposal for waste material generated from street sweeping throughout the campuses. Open parking lots, parking garages, and streets were swept/cleaned at the targeted frequency.
<b>Evaluation: Environmental Indicators of Effectiveness</b>	None	
<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>Landscape Services will inspect all above ground green infrastructure and structural storm water controls at least annually.</p>	

<b>Measurable Goals</b>	<b>All Years:</b> All structural and green infrastructure controls will be inspected and maintained at the required frequency.	
<b>Report</b>	Percentage of Preventative Maintenance inspections conducted on stormwater controls.	All (100%) UNL post-construction stormwater controls inventoried in BMP 5.06 were inspected by the responsible department in 2025.
<b>Evaluation: Environmental Indicators of Effectiveness</b>		
<b>Reference</b>	<p><b>BMP 6.10 Training and Education</b> (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> </ol>	

	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.	
<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>	As reported for BMP 3.08, two hundred and eighty (280) UNL staff received initial or refresher training in 2025 and represented the following departments: Building Systems Maintenance, Utilities Services, Landscape Services, EHS, Animal Science, Athletics, Campus Recreation, Nebraska Union, Facilities Planning and Construction, Housing, Sustainability, and Transportation. This included “field staff” and employees at “high risk facilities”.
<b>Evaluation: Environmental Indicators of Effectiveness</b>		
<b>Reference</b>	<p><b>BMP 6.11 Contractor Requirements and Oversight</b> (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 responsible for each of the BMPs identified for this program.</p>	
<b>Responsible</b>	Leadership of the UNL department issuing the contract for work by the contractor	
<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	No illicit discharges associated with municipal maintenance activities

	activities conducted by outside contractors during the reporting period.	conducted by an outside contractor were reported to or discovered by EHS during calendar year 2025.
<b>Evaluation: Environmental Indicators of Effectiveness</b>	None	