University of Nebraska at Omaha – Stormwater Management Plan

The University of Nebraska at Omaha developed this stormwater management plan (SWMP) in effort to reduce the discharge of pollutants from our campuses to the maximum extent possible (MEP), to protect water quality, and to satisfy the appropriate water quality requirements of the Clean Water Act. Described below are strategies proposed to satisfy the minimum control measures described in 119NAC10, paragraphs 002.12B through 002.12F. This plan covers a five-year period from the date of issuance to be fully implemented as described below. Measurable goals listed in the SWMP are target goals on which progress will be reported in the annual report.

MCM 002.12B – Public Education and Outreach

The Municipal Separate Storm Sewer System (MS4) must implement a public education and outreach program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff.

Item	SWMP Element Description	Target Goals and Implementation Schedule
1.	Develop a plan for outreach that defines the goals, objectives, target audience and distribution process of materials for the public education and outreach program. **EHS: Senior Specialist**	Year 1 -- Develop a 5-year education and outreach plan. Submit the plan to NDEQ with the Annual Report. Years 2-5 -- Review and update the plan each permit year and include the revised plan in the Annual Report.
2.	Publish and update stormwater educational material on the EHS web site. Collaborate with University Communications and Student Affairs to develop and distribute awareness information for the campus community. **EHS: Senior Specialist**	Year 1 -- Publish UNO's Stormwater Permit and SWMP on the EHS web site. Years 2-5 -- Disseminate information to targeted areas of campus using appropriate strategies for target audiences.
3.	Collaborate with faculty to incorporate stormwater considerations into the student curriculum. **EHS: Senior Specialist**	On-Going All Years – Inventory course offerings that include significant components of stormwater management and summarize in the Annual Report.

MCM 002.12C –Detect and Eliminate Illicit Discharges

The permit will require that the MS4 develop, if not already completed, a storm sewer system map, showing the location of all outfalls and the names and locations of all waters of the state that receive discharges from these outfalls.

Item	SWMP Element Description	Target Goals and Implementation Schedule
1.	The MS4 must develop, if not already completed, a storm sewer system map, showing the location of all outfalls and the names and locations of all waters of the state that receive discharges from these outfalls; **FMP: Facilities Director**	Years 1 and 2 -- Develop a completed storm sewer system map for all three campuses and submit completed maps to NDEQ with the Year 2 Annual Report. Years 3-5 – Maintain and updated storm sewer system map per the permit requirements.
2.	To the extent allowable under state or local law, the MS4 must effectively prohibit, through ordinance or other regulatory mechanism, non-stormwater sewer system and implement appropriate enforcement procedures and actions **EHS: Senior Specialist and FMP: Director**	Year 1 – EHS will identify and assemble a group of primary stakeholders to evaluate enforcement options and draft a plan enforcement procedures and actions. Years 2-5 – The formal Enforcement Plan will be implemented. The plan will be reviewed annually for needed modifications and updates.
3.	The MS4 must develop and implement plans to detect and address non-stormwater discharges, including illegal dumping to the MS4 system; and **EHS: Senior Specialist**	Year 1 – EHS will develop dry-weather screening procedures and frequency schedule for all UNO outfalls 8" or greater in size. Years 2-5 – EHS will conduct dry-weather screening of all UNO outfalls 8" or greater, such that all outfalls are screened during the 5-year permit cycle.
4.	The MS4 must inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste. **EHS: Senior Specialist**	Year 1 – EHS will work with University Communications to develop a plan to share with the campus community and general public to warn of the hazards associated with illegal discharges and improper disposal of waste. Years 2-5 – Report efforts made to inform these audiences in the annual report.
5.	The MS4's program need not address the following categories of non-stormwater discharges or flows and illicit discharges if the MS4 correctly identifies them as not significant contributors of pollutants to the small MS4: water line flushing, landscape irrigation, diverted stream flows, rising ground water, uncontaminated ground water infiltration, uncontaminated pumped ground water, discharges from potable water sources, foundation drains, air conditioning condensation, irrigation water, springs, water from crawl space pumps, flows from riparian habitats and wetlands, dechlorinated swimming pool discharges, and street wash water, discharges or flows from fire fighting activities. **EHS: Senior Specialist**	All years – These categories of non-stormwater discharges are not considered to be significant contributors of pollutants. Should events occur that might change this evaluation (such as a significant physical plant failure) they will be described (including any actions taken to prevent their recurrence) in the annual report.

MCM 002.12D – Construction Site Runoff Control

The permit will require that the MS4 develop, implement, and enforce a program to reduce pollutants in any stormwater runoff to its small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of stormwater discharges from construction activity disturbing less than one acre must be included in the MS4 program if that activity is part of a larger common plan of development or sale that would disturb one acre or more. If the Director waives requirements for stormwater discharges associated with small construction activity in accordance with the definition in Chapter 1 the MS4 is not required to develop, implement, and/or enforce a program to reduce pollutant discharges from such sites. The program related to construction activities must include the development and implementation of, at a minimum:

Item	SWMP Element Description	Target Goals and Implementation Schedule
1.	An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under State or local law; (Note: Current University procedures and NDEQ regulations require contractors of construction sites to file appropriate NOI and SWMP for projects of this size.) **EHS: Senior Specialist and FMP: Director**	Year 1 – EHS and Facilities Management & Planning (FMP) will review current practices and procedures to ensure consistency with the University of Nebraska-Lincoln's (UNL) SWMP and include provisions for sanctions to the extent allowable under state and/or local law. Years 2-5 – Implement plan to ensure compliance with this section and update the plan as necessary to ensure compliance.
2.	Requirements for construction site operators to implement appropriate erosion and sediment control best management practices; **EHS: Senior Specialist**	Year 1 – Train EHS appropriate erosion and sediment control plans for construction sites. Years 2 -- Qualified EHS staff will review and approve the erosion and sediment control plans for every campus construction site subject to NPDES Construction General Permit requirements. EHS will maintain training records for all persons authorized to review and approve erosion and sediment control plans.
3.	Procedures for site plan review which incorporate consideration of potential water quality impacts; **EHS: Senior Specialist**	Year 1 – EHS and FMP will review current practices and procedures to ensure site plans are reviewed with respect to potential water quality impacts. Years 2-5 – Implement plan to ensure compliance with this section and update the plan as necessary.
4.	Procedures for site inspection and enforcement of control measures. **EHS: Senior Specialist**	Year 1 – EHS will develop written procedures for conducting and documenting inspections of permitted construction sites. Years 2-5 – Qualified EHS staff will inspect permitted construction sites at the following frequency: (a) at least two times per year; (b) upon report of a concern. Inspection reports will be documented and transmitted to the General Contractor and UNO project manager.

MCM 002.12E – Post Construction Runoff Control

The MS4's permit will require that the MS4 address post-construction development in new development and redevelopment. The MS4 must develop, implement, and enforce a program to address stormwater runoff from new development and redevelopment projects less one acre that are part of a common plan of development or sale. The program must ensure that controls are in place that would prevent or minimize water quality impacts and must include:

Item	SWMP Element Description	Target Goals and Implementation Schedule
1.	Development and implementation strategies which include a combination of structural and/or best management practices (BMPs) appropriate for the MS4's community; **EHS: Senior Specialist and FMP: Director**	Year 1 – EHS and FMP will review current practices and procedures to ensure consistency with UNL's post-construction guidelines. Years 2-5 – Implement plan to ensure compliance with this section and update the plan as necessary to ensure compliance.
2.	Use of an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under State or local law; and **EHS: Senior Specialist and FMP: Director**	Year 1 – EHS and FMP will review current practices and procedures to ensure provisions for sanctions are consistent with those in place at UNL and to the extent allowable under state and/or local law. Years 2-5 – Implement plan to ensure compliance with this section and update the plan as necessary to ensure compliance.
3.	Provision for adequate long-term operation and maintenance of BMPs. **FMP: Director**	Year 1 – FMP will develop a process to ensure final construction documents contain schedules and procedures for inspection and maintenance of BMPs following construction. Years 2-5 – FMP will ensure the schedule of inspection and maintenance activities are uploaded into the appropriate department's (e.g., Landscape Services) work order system so that assets are maintained in perpetuity.

MCM 002.12F – Pollution Prevention and Good Housekeeping

The MS4 permit will require pollution prevention and good housekeeping. The MS4 must develop and implement as operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations. The program must include employee training to prevent and reduce stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance.

Item	SWMP Element Description	Target Goals and Implementation Schedule
1.	Maintain an inventory and map of municipal facilities. Review annually and update as needed. **EHS: Senior Specialist and FMP: Director**	Year 1 – Conduct inventory of municipal facilities and ensure they are identified on appropriate campus maps. Years 2-5 -- Review and update the map each permit year and include in the Annual Report.
2.	Conduct assessments of municipal maintenance facilities and review their municipal runoff control plans as applicable. Revise plans as needed if facilities expand or reduce activities and implement recommendations based on annual inspections. **EHS: Senior Specialist**	**Year 1 –** Develop a strategy to assess municipal facilities and prioritize based upon a defined set of criteria, include strategy in the annual report. **Years 2 - 5 -** Track the number of assessments for municipal facilities based upon the strategy developed in year 1. Include the number of assessments completed, a description of the assessment procedure and any changes in facilities ranking in the annual report.
3.	Label stormwater inlets with a legible stormwater awareness message. **EHS: Senior Specialist and FMP: Director**	**Year 1 --** EHS will meet with the campus stakeholder group to evaluate appropriate labels to affix to storm sewer inlets. **Years 2 - 5** – Label storm sewer inlets as identified above. Report percentage of storm sewer inlets labeled in annual report.
4.	Implement practices for maintaining the storm sewer system that includes catch basin maintenance, open channels and other drainage structures, street sweeping, and structural stormwater controls. All maintenance procedures are to be performed such that waste water and waste materials do not enter the MS4. **FMP: Director**	**Year 1:** Provide a description of the maintenance programs in the annual report. **On-Going All Years**: Annually report on Sewer Maintenance activities related to maintaining the storm sewer system and changes to any of the maintenance practices.
5.	Provide training for municipal employees in pollution prevention and good housekeeping. **EHS: Senior Specialist**	**Year 1 -** Develop a strategy for municipal employee training in pollution prevention and good housekeeping, include s in annual report. **On-Going All Years** – Conduct training events for municipal staff include number of employees trained, based on strategy developed in year 1, in annual report.
6.	Provide educational material to contractors hired to perform maintenance activities on the MS4. **EHS: Senior Specialist and FMP: Director**	**Year 1 -** Develop materials to provide to contractors and include in the annual report**.** **Years 2 - 5 -** Include in the annual report any new materials or updates to existing materials.

MCM 002.12G – Qualifying Local Program

If an existing qualifying local program required the MS4 to implement one or more of the minimum control measures of paragraphs 002.12B through 002.12F of this section, the NPDES permitting authority may include conditions in an MS4's NPDES permit that direct the MS4 to follow that qualifying programs requirements rather than the requirements of 002.12B through 002.12F. A qualifying local program is a local, or State municipal stormwater management program that imposes, at a minimum, the relevant requirements of 002.12B through 002.12F.

Item	SWMP Element Description	Target Goals and Implementation Schedule
1.	UNO Anticipates this permit to be stand-alone rather than requiring our campus to follow another qualifying program.	No action required unless otherwise directed by the permit.

MCM 002.12H – BMPs, Measurables and Responsibilities

In the MS4's permit application (either a notice of intent for coverage under a general permit or an individual permit application), the MS4 must identify and submit to its NPDES permitting authority the following information:

Item	SWMP Element Description	Target Goals and Implementation Schedule
1.	The best management practices (BMPs) that the MS4 or another entity will implement for each of the stormwater minimum control measures at paragraphs 002.12B through 002.12F of this section;	See summary above
2.	The measurable goals for each of the BMPs including, as appropriate, the months and years in which the MS4 will undertake required actions, including interim milestones and the frequency of the action; and	See summary above
3.	The person or persons responsible for implementing or coordinating the MS4's stormwater management program.	See summary above