

COLORADO STATE UNIVERSITY

Program Description Document (PDD)

Permit Version- Modification 2, Issued 11/30/2022, Effective 1/1/2023

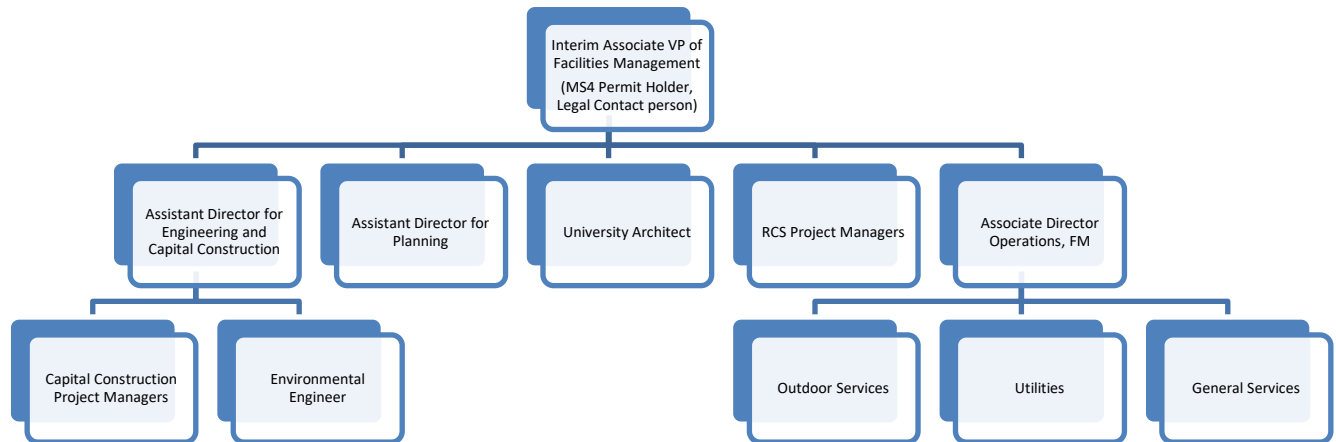
PDD Date: 12/31/2025, revision E

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Part I.C.1.c Organizational Chart

PDD Requirement: Part I.C.1.c. Organizational chart indicating responsibility over applicable departments by the legal contact.



The Environmental Engineer is responsible for tracking compliance with the MS4 permit and PDD. The Outdoor Services, Utilities and General Services groups conduct Stormwater Control Measure (SCM) inspections and input the data in the work management system, AiM. The Assistant Director for Planning is responsible for ensuring the MS4 permit requirements, CSU's Regulatory Requirements construction standards, and this PDD are consulted and complied with during program planning and master plans. The Assistant Director for Engineering and Capital Construction is responsible for MS4 permit compliance during and after construction. The Capital Construction project managers and RCS project managers are responsible for ensuring the MS4 permit requirements, CSU's Regulatory Requirements construction standards, and this PDD are consulted and complied with on each project. The Interim AVP of Facilities Management is the legal contact for the permit.

NOTE: The term "permittee" used throughout this document refers to Colorado State University (CSU).

Part I.D. Public Involvement/Participation

Part I.D.1. sections a, b and c: Public Involvement and Participation Process

Program Requirements (Part I.D.1)	Recordkeeping (Part I.D.2)	Compliance Schedule
The permittee must implement and document a Public Involvement and Participation process that complies with public notice requirements for actions conducted, when applicable, to comply with this permit. The following requirements apply: - The permittee must follow its own public notice requirements to provide opportunities for public involvement that reach a majority of the public and staff within the permittee's jurisdictional boundary through the notification process. - The permittee shall provide a mechanism and process that allows for review of the PDD by the public without charge, which may be met by providing electronic copies via electronic mail or posting it on a public website for download. In addition, the permittee's website must provide a statement that the PDD is publicly available for review and comment. PDDs available to the public must reflect all updates made prior to the previous 30 days. - The permittee must have the ability to accept and respond (in accordance with permit requirements) to information submitted by the public, including but not limited to information on illicit discharges or failure to implement or meet control measure requirements associated with applicable construction activities, applicable development sites, or permittee operations.	- Copies of the documents used to provide public notice and any public comment received as part of the public notice process. - Documentation of the mechanism used to allow the public to provide input. - Records of information submitted by the public in accordance with Part I.D.1.c and any actions the permittee took to address the information.	Part I.D.1.a, Part I.D.1.b. and Part 1.D.2 to be completed November 1, 2025 Part I.D.1.c. was completed November 1, 2022

PDD Requirement:

The CSU Facilities Management (FM) website allows for public involvement, public review and input on specific aspects of the MS4 program, including but not limited to: the Program Description Document (PDD), illicit discharges, construction activities, development sites and CSU operations (e.g. maintenance yards, fueling facilities, etc.). The SOURCE, which is emailed to the CSU community on a weekly or more frequent basis will be used to notify the CSU community (students, faculty and staff) within the jurisdictional boundary of this MS4 Permit of items available for public comment, with a link to the FM website containing the relevant item(s). The FM website and relevant items will list an email address or comment form to which people can provide input. The email or form will be tracked by FM personnel on a weekly basis and responses will be provided in a timely fashion. Front line personnel (dispatch, receptionists) at EHS, FM and public relations will be trained/informed of the need to direct stormwater questions to the engineering group for response and documentation.

Public comments, responses and documentation of actions taken in response to public input will be converted to .pdf files and stored in an access limited network drive on the Facilities administrative network

Title	Document Location
Facilities Management (colostate.edu)	stored in an access limited network drive on the Facilities administrative network
Colorado State University News - SOURCE (colostate.edu)	

Part I.E.1 Public Education and Outreach

Part I.E.1.a.i. Illicit Discharges:

Program Requirements (Part I.E.1)	Recordkeeping (Part I.E.1)	Compliance Schedule
i. Illicit Discharges: The permittee must provide information to businesses (which may include population, vendors, concessionaires, tenants, and contractors), if present, and the general public of impacts associated with illegal discharges and improper disposal of waste. The permittee can meet the requirements of this section through contribution to a collaborative program to evaluate, identify, target, and provide education and outreach that meet the requirements of this section. The permittee may incorporate the education and outreach to meet this requirement into the education and outreach strategies provided in accordance with Part I.E.1.a.ii. The information must be provided as follows: (A) The permittee must determine the targeted businesses (which may include the vendors, concessionaires, tenants, or contractors), that are likely to cause an illicit discharge or improperly dispose of waste. At a minimum, the permittee must identify at least one type of business, if present. (B) The permittee must develop and implement at least one education and outreach activity to one or more targeted user populations, businesses, vendors, concessionaires, tenants or contractors identified in Part I.E.1.a.i.(A). Educational materials and activities, individually or as a whole, must describe water quality impacts associated with illicit discharges and the improper disposal of waste, the behaviors of concern, and actions that the vendor, concessionaire, tenant, contractor or general public can take to reduce the likelihood of illicit discharges and the improper disposal of waste.	i. Illicit Discharges: A written list of the targeted user population group (e.g., park users; specified type of vendors, concessionaires, tenants, and contractors) and the distribution mechanism for each activity and the following: (A) Dates the activities were implemented, including, as applicable, dates of events and the materials that were made available. (B) Documentation of the activities that were provided and/or made available and the dates of distribution. Signs, markers, or equivalent intended to be maintained for the permit term must be described with location information.	Begin implementation November 1, 2023

PDD Requirement:

Illicit discharges may include cleaning wastewater, graywater, and spills. The following is a list of entities at CSU that could generate illicit discharges, and discharge examples.

- *Vendors: cleaning wastewater from food service events, graywater from outdoor event facilities.*
- *Concessionaires: cleaning wastewater from food service during outdoor athletic events, graywater from outdoor event facilities.*
- *Contractors: equipment cleaning, concrete truck wash water, spills from construction equipment, spills of construction materials. (see construction activities sections of this document for a complete list of construction-related pollutant sources)*
- *CSU motor pool: outdoor vehicle washing, outdoor vehicle maintenance*

- *CSU heavy equipment: outdoor equipment maintenance, outdoor equipment washing, hydraulic line leaks, oil leaks.*
- *CSU Bus Barn: leaks from outdoor vehicle storage*
- *CSU equipment storage at Mount Manure road: leaks from stored transformers*
- *CSU compost facility: improperly contained runoff*
- *CSU Housing and Dining Services: spills at loading docks, discharge of cleaning wastewater or food residue at loading docks, used oil spills or leaks.*
- *CSU Fleet Management: leaks from parked vehicles.*
- *CSU loading docks at Chemistry building: spills from loading and unloading of chemicals.*
- *CSU Salt Shed: salt dragout*
- *CSU Engineering Research Center storage yard: improperly stored chemicals, spills, leaks from equipment maintenance.*

CSU will prepare educational materials and conduct inspections to help minimize illicit discharges to stormwater from the entities and operations listed above.

Public education and outreach will consist of development of education materials (e.g. posters and flyers), signs, markers and training sessions.

Education materials, inspections and training sessions will be documented and stored on the CSU FM server.

Title	Document Location
See above.	stored in an access limited network drive on the Facilities administrative network

Part I.E.1.a.ii. Education and Outreach Activities:

Program Requirements (Part I.E.1.a)	Recordkeeping (Part I.E.1.b)	Compliance Schedule
ii. Education and Outreach Activities Table: Each year, the permittee must implement at least four education and outreach activities (bulleted items) and at least two must be from the Active and Interactive Outreach column. The activities can be the same from year to year or be different each year.	ii. Education and Outreach Activities: A written list of the targeted pollutant sources and/or pollutants, the target audience, and distribution mechanism for each activity and the following: (A) Dates the activities were implemented, including, as applicable, dates of events and the materials that were made available. (B) Documentation of the activities that were provided and/or made available and the dates of distribution. Signs, markers, or equivalent intended to be maintained for the permit term must be described with location information.	Begin implementation May 1, 2023

PDD Requirement:

Passive Outreach:

- *CSU will develop and install interpretive signage at select SCMs to educate the public about its stormwater treatment systems such as rain gardens, sand filters, permeable pavers and bioswales.*
- *CSU's stormwater webpage located on the CSU Facilities Management website will continue to be updated on an annual basis.*

Active and Interactive Outreach:

- CSU will promote an existing local stormwater/environmental events or program that helps protect water quality. Events or programs may include: CSU academic class materials specifically tailored toward stormwater pollution prevention (e.g. Low Impact Development, stormwater control measures design, etc.). - CSU's Integrated Solid Waste group and/or Surplus may participate in a Household Hazardous Waste event during Earth Month each year. - CSU will continue to participate each year in the Earth Day activities on campus, including staffing a table to answer questions and hand out stormwater pollution prevention information.	
Title	Document Location
Facilities Management (colostate.edu)	stored in an access limited network drive on the Facilities administrative network
Facilities Management website	Stormwater Management Facilities Management (colostate.edu)

TABLE 1: Education and Outreach Activities Table

Passive Outreach	Active and Interactive Outreach (pick any two bullets each year)
- Provide a bus shelter/bench advertisement on at least one bench. - Provide a billboard/dasher board advertisement on at least one billboard/dasher board. - Provide a vehicle/bus advertisement on at least 3 busses. - Provide radio/television/movie theatre advertisement. - Publish newspaper advertisement in at least two issues. - Distribute educational materials by brochure, door hanger or email to at least 50 percent of the user population. - Distribute educational materials by fact sheet to at least 50 percent of the user population. - Distribute educational material by utility bill insert to at least 50 percent of the user population. - Publish article (hard copy or electronic). - Provide storm drain marking by permittee staff that maintains 25% of permittee maintained inlets. - Provide stormwater related signage. - Provide a website. - Social media advertisement for a minimum of 1 month.	- Provide ongoing advertisement/promotion of a stormwater hotline number or other method to report an illicit discharge - Provide ongoing advertisement/promotion on how to get more information about the stormwater program - Provide an ongoing social media program - Provide a website that is interactive or contains stormwater information that includes actions that can be taken to reduce stormwater pollution. - Provide two newsletters (hard copy or electronic). - Promote an existing local stormwater/environmental events or program that helps protect water quality. - Distribute promotional items or giveaways. - Participate in or sponsor a water festival which involves populations that exist within the permit boundary. - Participate in or sponsor a waterway clean-up and trash removal event. - Participate in or sponsor a service project. - Participate in or sponsor a stormwater or environmental presentation. - Participate in or sponsor a stormwater or environmental event. - Participate in or sponsor community project based programs that investigate watershed health and meet applicable school Science, Technology, Engineering and Math (STEM) standards. - Participate in or sponsor a household hazardous waste event. - Participate in or sponsor an Adopt-a-Street program. - Participate in or sponsor an Adopt-a-Waterway program. - Participate in or sponsor an Adopt-a-Storm Drain program. - Provide ongoing access to motor vehicle fluids recycling program. - Participate in a stormwater booth at a community event. - Conduct a stormwater survey. - Sponsor a storm drain marking program performed by the public/community. - Provide pet waste stations. - Participate in, plan, or present stormwater materials to schools. - Provide stormwater demonstration projects that show control measures or other pollutant reduction methods. - Include information and links for stormwater regulations when soliciting construction contractors. - Participate in or sponsor a poster contest.

27. Ongoing social media campaign.

Part I.E.1.a.iii. Nutrients:

Program Requirements (Part I.E.1.a.)	Recordkeeping (Part I.E.1.b.)	Compliance Schedule
iii. Nutrients: As part of their public education program, the permittee must specifically address the reduction of water quality impacts associated with nitrogen and phosphorus in discharges from the MS4. This program component must address both pollutants: nitrogen and phosphorus. Permittees can meet the requirements of this section through contribution to a collaborative program to evaluate, identify, target, and provide education and outreach that addresses sources state-wide or within the specific region or watershed that includes the receiving waters impacted by the MS4 permittee's discharge. (A) For both nitrogen and phosphorus, the permittee must determine the targeted sources (e.g., residential, industrial, agricultural, or commercial) that are contributing to, or have the potential to contribute these constituents to the waters receiving the discharge authorized under the MS4 permit. Targeted sources may include but are not limited to the use of deicers containing phosphorus, application of fertilizers, and pet waste. (B) The permittee must prioritize which targeted sources are likely to obtain a reduction in nutrient discharges through education and outreach. The permittee must distribute educational materials or equivalent outreach to the prioritized targeted sources. Educational materials or equivalent outreach, individually or as a whole, must describe stormwater quality impacts associated with nitrogen and phosphorus in stormwater runoff and illicit discharges, the behaviors of concern, and actions that the target source can take to reduce nutrients. Examples of education efforts includes: encouraging responsible fertilizer application, encouraging xeriscaping, proper disposal of leaves and lawn waste, and evaluating alternatives to deicers containing phosphorus. (C) The permittee may incorporate the education and outreach to meet this requirement into the education and outreach activities provided in accordance with Part I.E.1.a.ii.	iii. Nutrients: A written list of the targeted sources that are contributing to, or have the potential to contribute nutrients to stormwater and the education and outreach activity for nitrogen and phosphorus sources.	Part A: May 1, 2023 Part B: Begin implementation May 1, 2023

PDD Requirement:

CSU's Foothills Campus and South Campus have agricultural types of uses and activities that may contribute nitrogen and phosphorus to stormwater runoff and snowmelt. Fertilizer application on Main Campus has the potential to contribute nitrogen to stormwater runoff and snowmelt. The following are operations at CSU that can potentially introduce nutrients, primarily nitrogen, into stormwater runoff, and that can potentially realize a reduction in nutrient loading.

Location	Department
South campus, Sheep and llama pens	Animal science
Foothills Campus, Mount Manure	CVMBS, Equine Science
Foothills Campus, Bison pens at NWRC	NWRC/CVMBS
Foothills Campus, Sheep Pen area	Animal science
Foothills Campus, horse pens south of Rampart Road	Equine science
Campus-wide: fertilizer application on turf areas	Grounds group, FM
Foothills Campus, Colorado State Forest Service nursery fertilizer usage	CSFS

Education and Outreach:
Education, training and/or posters tailored to each user and area will be developed and distributed between May 2023 and May 2024.

Additional nutrient education posters were distributed in November 2025.

Title	Document Location
CSU MS4 Permit Nutrient Sources Requirements and Plan, 4/28/2023	stored in an access limited network drive on the Facilities administrative network
Nutrient Reductions Folder	

Part I.E.2. IDDE Program

Part I.E.2.a.i. Storm Sewer System Map

Program Requirements (Part I.E.2.a)	Recordkeeping (Part I.E.2.b)	Compliance Schedule
i. Storm Sewer System Map: The permittee shall maintain a current map of the location of all MS4 outfalls within the jurisdiction boundary, interconnections with other MS4s and the names and location of all state waters that receive discharges from those outfalls.	i. Storm Sewer System Map: The current stormwater map for each campus is maintained on the Facilities Management server at N:\Lib Edit\Utilities. Outfall location maps are maintained at: H:\ME-US\Environ Regs & Permits\Stormwater MS4\Maps Outfalls	Completed May 1, 2023

PDD Requirement:

CSU maintains updated maps of storm sewers for Main, South and Foothills campuses on the Facilities Management server at N:\Lib Edit\Utilities. The maps show CSU-owned storm sewers, interconnections to City of Fort Collins storm sewers, and outfall locations. The maps on this drive are updated whenever changes to the storm sewers, inlets and related infrastructure are made. Additional maps showing outfall locations and receiving waters are maintained on the Facilities Management server at: H:\ME-US\Environ Regs & Permits\Stormwater MS4\Maps Outfalls.

Title	Document Location
<i>Storm sewer maps:</i>	stored in an access limited network drive on the Facilities administrative network
<i>Outfall and receiving water maps:</i>	stored in an access limited network drive on the Facilities administrative network

Part I.E.2.a.ii. Regulatory Mechanism:

Program Requirements (Part I.E.2.a)	Recordkeeping (Part I.E.2.b)	Compliance Schedule
ii. Regulatory Mechanism: The permittee's regulatory mechanism must: (A) Prohibit illicit discharges into the MS4 unless excluded from being effectively prohibited in accordance with Part I.E.2.a.v; (B) Have a procedure to request access to property(ies), as necessary to implement the illicit discharges procedures, (C) Provide the permittee the legal ability to cease or require to be ceased and remove, or require and ensure the removal of, and impose penalties for all illicit discharges for the period from when the illicit discharge is identified until removed.	ii. Regulatory Mechanism: The applicable policies, contracts, codes, resolutions, ordinances, specifications, operating procedures, and other documents used to meet the permit requirements.	Part I.E.2.a.ii To be completed November 1, 2025 Part I.E.2.b.ii To be completed November 1, 2024

PDD Requirement:

CSU owns the entities encompassed by the MS4 permit area and prohibits illicit discharges (except allowable non-stormwater discharges) to the land, storm sewers therein through its MS4 Permit and Construction Standards Part IV Regulatory Requirements. CSU personnel have the right of entry onto the land and into the buildings within its MS4 boundary and can enforce the prohibition of illicit discharges on its land and into its storm sewer systems.

Title	Document Location
<i>Colorado State University Facilities Planning, Design and Construction Standards, Part IV – Regulatory Requirements</i>	Colorado State University Facilities Planning, Design and Construction Standards Facilities Management Colorado State University (colostate.edu)
<i>CDPS General Permit COR070000 Stormwater Discharges Associated with Non-Standard Municipal Separate Storm Sewer Systems (MS4s), Issued 11/30/2022</i>	Stormwater Management Facilities Management Colorado State University (colostate.edu)

Part I.E.2.a.iii. Regulatory Mechanism Exemptions:

Requirements (Part I.E.2.a)	Recordkeeping (Part I.E.2.b)	Compliance Schedule
iii. Regulatory Mechanism Exemptions: Procedures must be implemented to ensure that any exclusions, exemptions, waivers, or variances included in the regulatory mechanism are applied in a manner that complies with the terms and conditions of this permit.	iii. Regulatory Mechanism Exemptions: The applicable codes, resolutions, ordinances, and program documents used to meet the permit requirements.	Part I.E.2.a.iii To be completed November 1, 2025 Part I.E.2.b.iii To be completed November 1, 2024

PDD Requirement:

CSU does not issue waiver or exemptions from illicit discharge prohibition.

Part I.E.2.a.iv. Tracing an Illicit Discharge:

Program Requirements (Part I.E.2.a)	Recordkeeping (Part I.E.2.b)	Compliance Schedule
iv. Tracing an Illicit Discharge: The permittee must implement procedures as soon as possible, but within 72 hours, to respond to reports/identification of illicit discharges. Except as related to dry weather monitoring for total maximum daily loads (TMDLs) required under Part III , the permittee is not expected to actively seek out unreported illicit discharges, but is required to identify and respond to illicit discharges observed during all work activities. All reported /known illicit discharges must be investigated; however investigation is only required to take place during normal work hours. The permittee must document and implement procedures, including the	iv. Tracing an Illicit Discharge: (A) The applicable program documents and procedures used to respond to reports/identification of illicit discharges.	Part I.E.2.a.iv To be completed November 1, 2024 Part I.E.2.b.iv To be completed November 1, 2024

Program Requirements (Part I.E.2.a)	Recordkeeping (Part I.E.2.b)	Compliance Schedule
tools needed, to trace the source of an illicit discharge when identified within the MS4. This may include contacting the division to identify unpermitted discharges of groundwater that do not meet water quality standards.		

PDD Requirement:

CSU Utilities, Engineering, Plumbing, HDS or EHS personnel will commence tracing an illicit discharge within 72 hours of being made aware of such discharge.

Title	Document Location
<i>An explanatory document dated October 2024 is stored on the network.</i>	stored in an access limited network drive on the Facilities administrative network

Part I.E.2.a.v. Discharges that could be Excluded from being effectively prohibited:

Program Requirements (Part I.E.2.a)	Recordkeeping (Part I.E.2.b)	Compliance Schedule
v. Discharges that can be Excluded from being Effectively Prohibited: The following discharges do not need to be effectively prohibited and the permittee is not required to address the discharges as illicit discharges in accordance with the requirements of this permit. The permittee must list all discharges excluded from being effectively prohibited in their regulatory mechanism as an allowable non stormwater discharge. Any discharges listed below that are not listed in the permittee's regulatory mechanism must be effectively prohibited. See <i>Part I.E.2.a.v.(A)-(X)</i>	v. Discharges that could be excluded from being effectively prohibited: (A) Copies of all required submittals to the Division. (B) Copies of the documents used to provide any required public notice and any public comment received as part of the public notice process.	Part I.E.2.a.v List of other discharges submitted to Division: Completed May 1, 2022 Regulatory Mechanism updated: To be completed November 1, 2025 Part I.E.2.b.v To be completed November 1, 2024

PDD Requirement:

The following discharges are excluded from being effectively prohibited. In other words, these are allowable non-stormwater discharges:

- A. Landscape irrigation*
- B. Lawn watering*
- C. Diverted stream flows*
- D. Irrigation return flow*
- E. Rising groundwater*
- F. Uncontaminated groundwater infiltration (Water other than wastewater that enters a sewer system (including sewer service connections and foundation drains) from the ground through such means as defective pipes, pipe joints, connections, or manholes.)*
- G. Uncontaminated pumped groundwater*
- H. Springs*
- I. Flows from riparian habitats and wetlands*
- J. Water line flushing in accordance with CDPHE's "Low Risk Policy Discharge Guidance: Potable Water"*

K. Discharges from potable water sources in accordance with CDPHE's "Low Risk Policy Discharge Guidance: Potable Water" L. Foundation drains, water from crawl space pumps, and footing drains as long as source is above the groundwater table M. Air conditioning condensation N. Individual residential car washing O. Dechlorinated swimming pool discharges in accordance with CDPHE's "Low Risk Discharge Guidance: Discharges from Pools, Fountains and Other Similar Type Facilities that are Fed Solely by Potable Water" P. Water incidental to street sweeping that is not associated with construction Q. Dye testing in accordance with the manufacturer's recommendations R. Stormwater runoff with incidental pollutants S. Discharging resulting from emergency firefighting activities T. Drainage from watercraft, vehicles and trailers used for recreation, wildlife management operations or maintenance operations when removed from a water body. Drain age must not contain other non-stormwaters and must not contain a sheen or discoloration U. Discharges authorized by a CDPS or NPDES permit V. Agricultural stormwater runoff W. Discharges that are in accordance with the division's Low Risk Policy guidance documents or other division policies and guidance documents where the division has stated that it will not pursue permit coverage or enforcement for specified point source discharges. X. Other discharges that the permittee will not consider as an illicit discharge when approved by CDPHE	
Title	Document Location
Letter from CSU to CDPHE dated March 16, 2022 re: Allowable Non-Stormwater Discharges	stored in an access limited network drive on the Facilities administrative network

Part I.E.2.a.vi. Removing an Illicit Discharge and vii. Coordination with Surrounding MS4 Permittees

Program Requirements (Part I.E.2.a)	Recordkeeping (Part I.E.2.b)	Compliance Schedule
vi. Removing an Illicit Discharge: When an illicit discharge is identified, the permittee must remove or require the removal of the source of the illicit discharge. The permittee must also cease or require the cessation of the illicit discharge. After the illicit discharge has been ceased, the permittee must also minimize surface contamination by removing or requiring the removal of surface residue or other type of pollutant source. The removal requirement can be met by notifying the Division through a written report when CDPS or NPDES general permit coverage is available for a discharge and the discharge is not subject to prohibitions against issuance of a permit in regulation 61.8(1). The permittee must also have written procedures for requiring cleanup from the operator and procedures for cleanup conducted by the permittee, when necessary, to remove materials associated with the illicit discharge.	vi. Removing an Illicit Discharge: (A) The information used by the permittee to identify repeat occurrences from the same responsible party concerning the same type of illicit discharge. The permittee must document and maintain records of each illicit discharge identified by the permittee that includes the following information, or identifies that the information is unknown or not applicable: 1) The date that the illicit discharge was reported to and/or identified by the permittee. 2) The date the permittee responded to the reported/identified illicit discharge or notified a surrounding MS4 permittee. 3) The location of the illicit discharge. 4) Responsible party for the illicit discharge (if identified). 5) A description of the source and nature of the illicit discharge.	To be completed November 1, 2024

Program Requirements (Part I.E.2.a)	Recordkeeping (Part I.E.2.b)	Compliance Schedule
vii. Coordination with Surrounding MS4 Permittees: If illicit discharges that are within the permittee's implementation authority are observed to discharge to another operator's municipal storm sewer system, then the permittee must notify the other operator within 72 hours of discovery. If another operator notifies the permittee of an illegal discharge release to the permittee's MS4 then the permittee must meet the requirements of Part I.E.2.a.	6) A description of how the source of the illicit discharge was eliminated/resolved. 7) Documentation of enforcement actions (if applicable).	

PDD Requirement:

Examples of illicit discharges include spills from CSU-owned equipment or vehicles, spills from non CSU-owned vehicles, improper cage or equipment cleaning, and improper concrete washout by contractors. When an illicit discharge is discovered, CSU's EHS and/or FM personnel are notified and take appropriate action. Actions include:

- *Stopping the discharge*
- *Cleaning up areas impacted by the discharge*
- *Locating persons who caused the discharge, if possible*
- *Instructing the responsible person(s) to cease the discharge*
- *Notifying the City of Fort Collins or Larimer County Stormwater department if the discharge entered a City or County storm system component*
- *Providing additional notification to agencies (CDPHE, and/or EPA), if it is a reportable spill*
- *Preparing documentation of the discharge and actions taken, including information listed in I.E.2.b.vi of the permit.*

Additional information on oil spill response and reportable oil spills is contained in CSU's Spill Prevention Control and Countermeasure (SPCC) Plan.

Title	Document Location
SOP Concrete Washout SPCC Plan	stored in an access limited network drive on the Facilities administrative network

Part I.E.2.a.viii. Enforcement Response:

Program Requirements (Part I.E.2.a)	Recordkeeping (Part I.E.2.b)	Compliance Schedule
viii. Enforcement Response: (A) The permittee must implement appropriate written enforcement procedures and actions to eliminate the source of an illicit discharge when identified/reported, discourage responsible parties from willfully or negligently repeating or continuing illicit discharges, and discourage future illicit discharges from occurring. The written procedures must address mechanisms for enforcement for all illicit discharges from the moment an illicit discharge is identified/reported until it is eliminated. The	vii. Enforcement Response: The applicable policies, codes, resolutions, ordinances, and program documents used to meet the permit requirements.	To be completed November 1, 2024

Program Requirements (Part I.E.2.a)	Recordkeeping (Part I.E.2.b)	Compliance Schedule
permittee must escalate enforcement as necessary based on the severity of violation and/or the recalcitrance of the responsible party to ensure that findings of a similar nature are enforced upon consistently. Written enforcement procedures must include informal, formal, and judicial enforcement responses. (B) If the permittee lacks the authority under state or local law to eliminate the source of an illicit discharge when identified/reported, stop responsible parties from willfully or negligently repeating or continuing illicit discharges, and discourage future illicit discharges from occurring; the permittee must notify the other agency that has regulatory authority (e.g., state federal, other MS4 permittee or other local agency) within 72 hours of discovery.		

PDD Requirement:

CSU's Spill Response SOP addresses enforcement procedures that can be taken against entities responsible for spills. The same procedures apply to other types of illicit discharges. Additional enforcement actions may be taken against Contractors in accordance with the terms of executed contract between CSU and the Contractor.

Title	Document Location
Stormwater SOP 14.12 "Spill Response"	stored in an access limited network drive on the Facilities administrative network

Part I.E.2.a.ix. Priority Areas:

Program Requirements (Part I.E.2.a)	Recordkeeping (Part I.E.2.b)	Compliance Schedule
ix. Priority Areas: The permittee must locate priority areas with a higher likelihood of having illicit discharges, including areas with higher likelihood of illicit connections.	viii. Priority Areas: The map and/or list of priority areas.	Part I.E.2.a.ix Completed November 1, 2023 Part I.E.2.b.viii To be completed November 1, 2024

PDD Requirement:

CSU developed a list of priority areas subject to illicit discharges, and associated departments to receive training.

Title	Document Location
"CSU MS4 Permit, Priority Areas Subject to Illicit Discharges", 10/27/2023, as amended.	stored in an access limited network drive on the Facilities administrative network

Part I.E.2.a.x. Training:

Program Requirements (Part I.E.2.a)	Recordkeeping (Part I.E.2.b)	Compliance Schedule
x. Training: The permittee must train applicable staff to recognize and appropriately respond to illicit discharges observed during typical duties. The permittee must identify those who will be likely to make such observations and provide training to those individuals. The training must address how suspected illicit discharges will be reported/identified, general information for recognizing and responding to illicit discharges observed during typical duties, information on the sources and types of operations or behaviors that can result in an illicit discharge, and information on the location of priority areas.	ix. Training: A list of brief staff title descriptions and organizational names that must be trained and the frequency of training. Program documents that describe how and when new employees will be trained. Name and department of each individual trained, date of training, the type of training, and a list of topics covered.	To be completed November 1, 2024

PDD Requirement:

CSU developed a list of priority areas subject to illicit discharges, and associated departments to receive training. Initial trainings were conducted between November 2023 and November 2024. Additional trainings will be performed as needed.

Title	Document Location
<i>"CSU MS4 Permit, Priority Areas Subject to Illicit Discharges", 10/27/2023, as amended.</i>	stored in an access limited network drive on the Facilities administrative network
Training Forms	stored in an access limited network drive on the Facilities administrative network

Part I.E.3. Construction Sites

Part I.E.3.a.i. Exclusions:

Program Requirements (Part I.E.3.a)	Recordkeeping (Part I.E.3.b)	Compliance Schedule
i. Exclusions: (A) Applicable construction activities within the jurisdictional boundary for which the permittee does not own or operate or have implementation authority over, (C) Construction Activities with R-Factor Waiver	i. Exclusion: Maintain records for exclusions covered under Part I.E.3.a.i(B) and Part I.E.3.a.i(C).	None given.

PDD Requirement:

CSU does not have control over construction activities at the following locations:

- *Centers for Disease Control (Foothills Campus)*
- *Poudre Fire Authority (Foothills Campus)*
- *Genetic Seed Lab (Main Campus)*
- *National Wildlife Research Center (NWRC, Foothills Campus)*
- *Natural Resources Research Center (NRRC, South Campus).*

CSU does require the above entities to comply with CSU's MS4 permanent Stormwater Control Measure and stormwater detention requirements in accordance with CSU's "Planning Design and Construction Standards Part IV Regulatory Requirements", however construction oversight and inspections are not performed by CSU.

CSU has its own MS4 construction stormwater program and no permanent agreements in place with the City of Fort Collins or Larimer County for stormwater during construction. When a project straddles a CSU/City or CSU/County MS4 boundary, CSU coordinates with the City or County to identify which entity will oversee the project from a stormwater perspective, and documents the coordination in a letter or email.

Title	Document Location

Part I.E.3.a.ii. Regulatory Mechanism:

Program Requirements (Part I.E.3.a)	Recordkeeping (Part I.E.3.b)	Compliance Schedule
ii. Regulatory Mechanism: (A) The ability to implement sanctions against entities responsible for applicable construction activities. (B) Require control measures to be implemented for all applicable construction activities from initial disturbance until final stabilization.	ii. Regulatory Mechanism: The applicable policy, contracts, codes, resolutions, ordinances, and program documents used to meet the permit requirements.	To be completed November 1, 2025

PDD Requirement:

Contractors performing work under contract with CSU are required to comply with the version of the "Colorado State University Facilities Planning, Design and Construction Standards" in place at the time of contract execution. Part IV "Regulatory Requirements" includes reference to the MS4 permit and this Program Description Document. Contractors in non-compliance with these requirements are in breach of contract and CSU can take legal action as described in the contract to bring the contractor back into compliance or terminate the contract.

Title	Document Location
Contract, latest version, as stipulated by the Colorado Office of the State Architect (OSA).	Home OSA (colorado.gov)
"Colorado State University Facilities Planning, Design and Construction Standards, Part IV Regulatory Requirements"	Colorado State University Facilities Planning, Design and Construction Standards Facilities Management Colorado State University (colostate.edu)

Part I.E.3.a.iii. Regulatory Mechanism Exemptions:

Program Requirements (Part I.E.3.a)	Recordkeeping (Part I.E.3.b)	Compliance Schedule
iii. Regulatory Mechanism Exemptions: Procedures must be implemented to ensure that any exclusions, exemptions, waivers or variances included in the regulatory mechanism are applied in a manner that complies with the terms and conditions of this permit.	iii. Regulatory Mechanism Exemptions: The applicable policy, contracts, codes, resolutions, ordinances, and program documents used to meet the permit requirements.	To be completed November 1, 2025

PDD Requirement:

CSU does not issue waivers or exemptions to "Part IV, Regulatory Requirements" of the "Colorado State University Facilities Planning, Design and Construction Standards".

Title	Document Location

Part I.E.3.a.iv. Control Measure Requirements:

Program Requirements (Part I.E.3.a)	Recordkeeping (Part I.E.3.b)	Compliance Schedule
iv. Control Measure Requirements: The permittee's Construction Sites Program must address selection, installation, implementation, and maintenance of control measures that meet the requirements of Part I.B. Control measures must prevent pollution or degradation of state waters. Control measures must also be appropriate for the specific construction activity, the applicable pollutant sources, and phase of construction...Control measures must meet the minimum requirements below. "...Appropriate control measures must be implemented prior to the start of construction activity, control potential pollutants during each phase of construction, and must be continued through final stabilization. Appropriate structural control measures must be maintained in operational condition. ...Control measures must be selected, designed, installed, implemented, and maintained to provide control for all	iv. Control Measure Requirements: The applicable contracts, standard operating procedures, codes, resolutions, ordinances, and program documents used to meet the permit requirements.	To be completed November 1, 2025

Program Requirements (Part I.E.3.a)	Recordkeeping (Part I.E.3.b)	Compliance Schedule
potential pollutants...at a minimum...(see the list in Part I.E.3.a.iv.C of permit)"		

PDD Requirement:

CSU has developed and implemented its own construction stormwater program since 2008. The program was documented in the previous Program Description. The following paragraphs and sections represent the revised and current version of CSU's construction stormwater program.

CSU requires contractors executing projects disturbing one acre or more to prepare a project-specific Stormwater Management Plan and obtain coverage under CDPHE's Colorado Discharge Permit System General Permit No. COR0400000 "Stormwater Discharges Associated with Construction Activity". Contractors are required to obtain coverage and signatures using the State's CEOS program. The CSU Project Manager is responsible for conveying CSU's requirements to the Contractor.

CSU's process for reviewing the Contractor's Stormwater Management Plan and conducting oversight inspections is as follows:

- 1. Contractor prepares a permit application in the State's website CEOS. When the contractor clicks on "email to owner", CSU's Assistant Director of Engineering and Capital Construction (ADECC) receives notification that the permit application is ready for his review and signature. The Utilities Supervisor and CSU Stormwater Inspector (listed as "reviewers" in CEOS) should also receive the notification.*
- 2. The Utilities Supervisor or CSU Stormwater Inspector reviews the permit application and emails the ADECC and the CSU Project Manager with review comments and/or approval.*
- 3. The ADECC signs the permit application in CEOS after receiving the email from the Utilities Supervisor or CSU Stormwater Inspector.*
- 4. In addition, Contractor is required to upload the permit application, Stormwater Management Plan (SWMP) and map into Bluebeam as a submittal and notify the CSU Project Manager.*
- 5. CSU Project Manager notifies the Utilities Supervisor and CSU Stormwater Inspector of the submittal, and they access Bluebeam and review the submitted documents.*
- 6. The Utilities Supervisor or CSU Stormwater Inspector uses a review stamp in Bluebeam to indicate their review, comments, and/or no comments.*
- 7. When the SWMP is approved and Contractor has obtained the permit, the CSU Stormwater Inspector notifies CSU's Asset Manager that project inspections will begin.*
- 8. CSU's Asset Manager sets up monthly Preventative Maintenance (PM) inspections for that site in AiM with no end date, and a work order is issued monthly to CSU's Stormwater Inspector. The work order is billed against the Utility stormwater account.*
- 9. CSU's Stormwater Inspector uses the work order to execute monthly inspections and documents them in AiM. If follow-up by Contractor is required, CSU's Stormwater Inspector notifies the CSU Project Manager by email.*
- 10. When the site is stabilized, CSU's Stormwater Inspector notifies CSU's Asset Manager that monthly inspection work orders can cease.*
- 11. The CSU monthly inspections can be found in AiM and are associated with the nearest building number.*

Prior to site disturbance, the Contractor is required to install construction Stormwater Control Measures (SCMs) per the SWMP and notify the CSU Project Manager that the site is ready for the initial inspection by CSU. The CSU Project Manager notifies the Utilities Supervisor and CSU Stormwater Inspector. The CSU Stormwater Inspector conducts the initial inspection.

For sites disturbing less than one acre, the CSU Project Manager can, at the request of the Utilities Supervisor or CSU's Stormwater Inspector, require site specific SCMs. This information will be relayed to the Contractor at or before the pre-construction meeting. The Utilities Supervisor and/or CSU's Stormwater Inspector may conduct site inspections at any time during construction, and if, in their opinion additional SCMs are required, they notify the CSU Project Manager who directs the Contractor to promptly install the required SCMs. This may include, but is not limited to, structural SCMs or non-structural SCMs such as street sweeping.

Title	Document Location
Contract, latest version, as stipulated by the Colorado Office of the State Architect (OSA).	Home OSA (colorado.gov)
"Colorado State University Facilities Planning, Design and Construction Standards, Part IV Regulatory Requirements"	Colorado State University Facilities Planning, Design and Construction Standards Facilities Management Colorado State University (colostate.edu)

Part I.E.3.a.v. Site Plans:

Program Requirements (Part I.E.3.a)	Recordkeeping (Part I.E.3.b)	Compliance Schedule
v. Site Plans: The permittee must require operators to develop and maintain site plans that locate and identify all structural and non-structural control measures for the applicable construction activities. The site plan must contain installation, implementation, and maintenance specifications or a reference to the document with installation, implementation, and maintenance specifications for all structural control measures. A narrative description of non-structural control measures must be included in the site plan. The permittee must require that a site plan be maintained to reflect current conditions. This means, among other actions, the permittee must take all documentation and enforcement steps necessary at each site in order to ensure that the site plan is maintained to reflect all current conditions.	v. Selected Control Measures Manuals: The selected control measures manual(s) used to meet the permit requirements.	To be completed November 1, 2025
v. Site Plan (A) Initial Site Plan Review: The permittee must review and approve all applicable construction activities prior to the start of construction activities. The permittee will only approve a site plan if the permittee has confirmed that the site plan: 1) Has been prepared in accordance with good engineering, hydrologic and pollution control practices. 2) Includes appropriate control measures for all potential sources of pollution at all stages of construction, including final stabilization. 3) Meets the requirements in Part I.E.3.a.iv. 4) Identifies all potential sources of pollution which may reasonably be expected to affect the quality of stormwater discharges associated with construction activity from the site, including those identified in Part I.E.3.a.iv(B).	vi. Site Plans: Copy of the initially approved site plan or, when there have been major modifications approved by the permittee, the site plan with those major modifications.	To be completed November 1, 2025

Program Requirements (Part I.E.3.a)	Recordkeeping (Part I.E.3.b)	Compliance Schedule
5) Includes a site description which includes, at a minimum, the requirements in Part I.E.3.a.v(A)5) a-i		
(B) Site Plan Revisions. Site Plan Revisions. The site plan must reflect current site conditions. The permittee will implement procedures and deadlines for the following site plan modifications: 1) Major Modifications. Changes to the original site plan that remove or add additional area to the project, modify the final hydrology or drainage of the final design, replace approved site plans, or otherwise expand or contract the scope of the original project shall require the submission of plans to the permittee for review and approval. 2) Minor Modifications. Modifications to the original site plan that do NOT increase the scope or change hydrology of the project but modify/improve specific control measures in use at site, indicate progression in phasing of the project, or specify relocation of previously approved control measures within the project shall be made in the field by the construction site owner/operator and thoroughly documented in the site plan narrative and/or site map drawings, where applicable. The permittee must evaluate minor modifications made by the construction site owner/operator during site inspections and determine if the modification is adequate. No formal written approval is required for minor modifications, except minor modifications identified during site inspections must be documented in some way (like initialing the map or through an electronic log, or inspection reports).	vi. Site Plans: Copy of the initially approved site plan or, when there have been major modifications approved by the permittee, the site plan with those major modifications.	To be completed November 1, 2025

PDD Requirement:

See above for initial site plan review process.

During monthly CSU inspections, CSU's Stormwater Inspector reviews Contractor's updated site plan, SCMs and inspections. Inspection checklist is included in PM work order in AiM.

Title	Document Location
Contract, latest version, as stipulated by the Colorado Office of the State Architect (OSA).	Home OSA (colorado.gov)
"Colorado State University Facilities Planning, Design and Construction Standards, Part IV Regulatory Requirements"	Colorado State University Facilities Planning, Design and Construction Standards Facilities Management Colorado State University (colostate.edu)

Part I.E.3.a.vi. Site Inspection:

Program Requirements (Part I.E.3.a)	Recordkeeping (Part I.E.3.b)	Compliance Schedule
vi. Site Inspection: (A) Site Inspection Frequency Exclusion: The permittee is only required to conduct	vii. Site Inspection: (A) Site Inspection Frequency Exclusion: The specifications, standards, operating procedures,	To be completed

Program Requirements (Part I.E.3.a)	Recordkeeping (Part I.E.3.b)	Compliance Schedule
inspections if there are observations or reports of discharges of sediment from disturbed areas: 1) Individual Homes in a Residential Subdivision- Finished Home. 2) Individual Homes in a Residential Subdivision-Unfinished Home 3) Winter Conditions (B) Initial Inspection (C) Routine Inspection (D) Reduced Site Inspection: 1) Inactive Site Inspection 2) Stormwater Management System Administrator's Program Inspection 3) Staff Vacancy 4) Indicator Inspection (E) Compliance Inspection	and other documents used to meet the permit requirements. (B, C, D) Initial Site Inspection/ Routine Site Inspection/ Reduced Site Inspection: Maintain inspection records with the following minimum information for all inspections conducted to meet the minimum inspection frequency: Inspection date, Name of inspector, Site identification, Inspection results including the location of any illicit discharges, failure to implement control measures, and inadequate control measures. The inspection results must also list (not locate) any control measures requiring routine maintenance, Type of inspection (E,F) Compliance Inspection, Recalcitrant Compliance Inspection: Maintain inspection records with the following minimum information for all inspections conducted to meet the minimum inspection frequency: Inspection date, Name of inspector, Site identification, Inspection results including any inadequate control measures that have not been resolved from the previous inspection, Type of inspection.	November 1, 2025

PDD Requirement:

See preceding two sections.

Part I.E.3.a.vii. Enforcement Response:

Program Requirements (Part I.E.3.a)	Recordkeeping (Part I.E.3.b)	Compliance Schedule
vii. Enforcement Response: Implement appropriate enforcement procedures and actions to meet the requirements of Part I.E.3. (A) The permittee must have processes and sanctions to minimize the occurrence of, and obtain compliance from, chronic and recalcitrant violators of control measure requirements. (B) The permittee must require enforcement escalation as necessary based on the severity of violation and/or the recalcitrance of the violator to ensure that findings of a similar nature are enforced upon consistently. Enforcement procedures must include the following types of enforcement or their equivalent: 1) Verbal warning	viii. Enforcement Response: The applicable codes, resolutions, ordinances and program documents used to meet the permit requirements. Maintain records of the enforcement response.	Part I.E.3.a.vii To be completed November 1, 2025

Program Requirements (Part I.E.3.a)	Recordkeeping (Part I.E.3.b)	Compliance Schedule
2) Written notification of non-compliance. The permittee must define this notification in the PDD. 3) Written notice of violation imposing fines or withholding payment. The permittee must define this notice in the PDD. 4) Written corrective order with schedule to obtain compliance. The permittee must define this corrective order in their PDD. 5) Written stop work order. 6) Administrative, civil, or criminal legal action. (C) The permittee must escalate enforcement procedures at a construction site if non-compliance has continued at the site for more than two inspections (see permit for additional requirements)		

PDD Requirement:

The enforcement sequence in escalating order will include the following:

- 1) Verbal warning
- 2) Written notification of non-compliance – the CSU Project Manager will send an email to the Contractor listing the non-compliant aspects of stormwater management at the site, and requiring correction within a specified amount of time (not longer than 72 hours)
- 3) Written notification of breach of contract with schedule to obtain compliance – the CSU Project Manager and/or University Architect will send an email to the Contractor listing the non-compliance issues and lack of response, and require correction within a specified amount of time.

The following items constitute non-compliance and trigger the enforcement sequence listed above:

- 1) Construction commencing without SWMP review in accordance with Part I.E.3.a.v and an initial inspection.
- 2) SWMPs consistently not maintained and modified in accordance with SWMP and CSU's requirements.
- 3) Control measures not maintained in operational condition at time of CSU inspection, including sites that have temporarily shut down construction activities.
- 4) Uncorrected finding(s) from previous inspections.
- 5) Failure to implement a control measure for a pollutant source or inadequate control measure resulting in a discharge of pollutants from the applicable construction site to the MS4 or state waters.
- 6) Failure to take corrective actions required by CSU.

Title	Document Location
Contract, latest version, as stipulated by the Colorado Office of the State Architect (OSA).	Home OSA (colorado.gov)
"Colorado State University Facilities Planning, Design and Construction Standards, Part IV Regulatory Requirements"	Colorado State University Facilities Planning, Design and Construction Standards Facilities Management Colorado State University (colostate.edu)

Part I.E.3.a.viii. State or EPA Inspection Notifications

Program Requirements (Part I.E.3.a)	Recordkeeping (Part I.E.3.b)	Compliance Schedule
viii. State or EPA Inspection Notifications Within 30 days of notification, the permittee will review any provided state and EPA inspection reports for construction sites also overseen by the permittee where the state or EPA has required a written response to findings of noncompliance with the CDPS general permit authorizing stormwater discharges associated with construction activities (CDPS stormwater construction permit, currently General Permit COR400000). The permittee will read and review the state or EPA inspection report against at least the two most recent inspections conducted by the permittee. The permittee will determine whether the evidence of noncompliance with the CDPS stormwater construction permit identified by the state or EPA is also grounds for noncompliance with the permittee's construction program. The permittee will maintain a documented summary of this review. The summary must describe whether the permittee's oversight failed to identify noncompliance, and must describe corrective actions that will prevent future oversight failures.	ix. State or EPA Inspection Notifications: The applicable specifications, contracts, standards; operating procedures, and other documents used to meet the permit requirements. Maintain records of the analysis of the comparison between permittee inspections and state or EPA inspections.	To be completed November 1, 2025

PDD Requirement:

If CSU or one of its construction contractors receives a notice of inspection of a construction site from CDPHE or EPA, the Utilities Supervisor and/or the ADECC will review the last two inspections for that site conducted by CSU's Stormwater Inspection to determine whether non-compliance issues in the CDPHE or EPA inspection are valid, and if so, determine whether they were identified by CSU's Stormwater Inspector, and if not, why.

If non-compliance issues in the CDPHE or EPA inspection are valid, CSU will work with the Contractor to prepare a written response within the specified timeframe.

If non-compliance issues were missed by CSU's Stormwater Inspector, the inspector and Utilities Supervisor will work together to minimize future recurrence.

Title	Document Location
<i>Agency Inspection documents sorted by project name.</i>	stored in an access limited network drive on the Facilities administrative network

Part I.E.3.a.ix. Training:

Program Requirements (Part I.E.3.a)	Recordkeeping (Part I.E.3.b)	Compliance Schedule
ix. (A) The permittee shall require that all operators of applicable construction activities have at least one individual responsible for implementing control measures that is knowledgeable in the principles and practices of erosion and sediment control and pollution prevention,	x. Training: Name and title of each staff trained, date of training, the type of training, and a list of topics covered.	To be completed November 1, 2024

Program Requirements (Part I.E.3.a)	Recordkeeping (Part I.E.3.b)	Compliance Schedule
and with the skills to assess conditions at construction sites that could impact stormwater quality and to assess the effectiveness of stormwater controls implemented to meet the requirements of this permit. (B) The permittee shall require all existing and newly hired permittee staff or parties acting on behalf of the permittee who are involved in applicable construction activities design, oversight and/or maintenance related to stormwater drainage and quality to attend a stormwater training course, or demonstrate other equivalent training, education, or experience, that includes, but is not limited to the following: (see Part I.E.3.a.ix.(B))		

PDD Requirement:

During review of the Contractor's SWMP, the Utilities Supervisor or CSU's Stormwater Inspector will verify that the Contractor has identified and named a responsible person trained in stormwater management for stormwater oversight and inspections.

CSU's Stormwater Inspector has/will be required to receive training in stormwater management through CDOT's stormwater inspector certification program, or equivalent.

Title	Document Location
<i>Training documentation, CSU Stormwater Inspector.</i>	stored in an access limited network drive on the Facilities administrative network

Part I.E.3.a.x. For Applicable Construction Activities that Overlap Multiple Permit Areas:

Program Requirements (Part I.E.3.a)	Recordkeeping (Part I.E.3.b)	Compliance Schedule
x. For Applicable Construction Activities that Overlap Multiple Jurisdictional Boundaries, when a written agreement is in place with a co-regulating MS4 permittee: (A) Control measure requirements may be imposed on the operator in accordance with the requirements of a co-regulating MS4 permittee pursuant to the written agreement. (B) Site plan review/acceptance and site inspection actions may be conducted by a co-regulating MS4 permittee to meet the requirement of the permit.	xi. For Applicable Construction Activities that Overlap Multiple Permit Areas: Copies of any written agreements between co-regulating MS4 permittees when required by Part I.E.3.a.x.	None given.

PDD Requirement:

CSU has its own MS4 construction stormwater program and no permanent agreements in place with the City of Fort Collins or Larimer County for stormwater during construction. When a project straddles a CSU/City or CSU/County MS4 boundary, CSU coordinates with the City or County to identify which entity will oversee the project from a stormwater perspective and documents the coordination in a letter or email.

Title	Document Location
<i>Agency Inspection documents sorted by project name.</i>	stored in an access limited network drive on the Facilities administrative network

Part I.E.4. Post-Construction Stormwater Management in New Development and Redevelopment

Part I.E.4.a.i. Exclusions:

Program Requirements (Part I.E.4.a)	Recordkeeping (Part I.E.4.b)	Compliance Schedule
i. Exclusions: Permittees may exclude the following from the requirements of an applicable development project. (A) Applicable development sites for which the permittee does not own or operate or have implementation authority over (B) Permittees with a documented MS4 participation agreement(s) (C) “Pavement Management Sites” (roadway rehabilitation, maintenance, or reconstruction without increasing impervious area) (D) Excluded Roadway Redevelopment (E) Excluded Existing Roadway Areas (F) Aboveground and Underground Utilities (G) Non-Residential and Non-Commercial Infiltration Conditions (H) Land Disturbance to Undeveloped Land that will Remain Undeveloped (I) Stream Stabilization Sites (J) Trails (but not bike lanes for roadways) (K) Stormwater Facilities See permit for definitions of each item above.	i. For exclusions under Part I.E.4.a.i(B) the permittee must describe general locations where another entity implements the post-construction program and must maintain documented MS4 agreements to comply with Part I.E.4.a.i(B). ii. Excluded Sites: Maintain records for activities covered under Part I.E.4.a.i(B) through (E) and (G) through (J). Records must include the site name, owner name, location, completion date, site acreage, reason for exclusion, and any information required below. (A) Pavement Management Sites – The acreage of the excluded impervious area for rehabilitation and reconstruction of pavement that are not maintenance sites. (B) Excluded Roadway Redevelopment – The acreage of the excluded paved area. (C) Excluded Existing Roadway Areas for Roadway Redevelopment – The acreage of the excluded impervious area. (D) Non-Residential and Non-Commercial Infiltration Conditions – The acreage of the excluded impervious area. (E) Sites with Land Disturbance to Undeveloped Land that will Remain Undeveloped Redevelopment – The acreage of the excluded impervious area. (F) Stream Stabilization Sites Redevelopment – The acreage of the excluded impervious area., if applicable. (G) Trails – The acreage of the excluded impervious area.	Part I.4.a.i.B through K To be completed November 1, 2026

PDD Requirement:

For parking lot, roadway and trail projects, CSU Project Managers will collect and store the required documentation listed above in the project-specific file in Bluebeam.

For capital construction projects that include parking lots, roadways and trails, the Drainage Report will include the documentation listed above.

Part I.E.4.a.ii and I.E.4.a.iii. Regulatory Mechanism and Exemptions:

Program Requirements (Part I.E.4.a)	Recordkeeping (Part I.E.4.b)	Compliance Schedule
ii. Regulatory Mechanism: The permittee must implement a regulatory mechanism to meet the requirements in Part I.E.4.a.i through xi, including, but not limited to: (A) Require control measures to be implemented for all applicable development sites. (B) Require the long-term operation and maintenance of control measures. (C) Ensure that mechanisms are in place as necessary to meet this requirement for control measures used to meet the requirements of this permit by an applicable development site in the jurisdictional boundary that are located outside of the implementation authority of the permittee. (D) Implement sanctions against entities responsible for applicable development sites and for the long-term operation and maintenance of the control measures. iii. Regulatory Mechanism Exemptions: Procedures must be implemented to ensure that any exclusions, exemptions, waivers, and variances included in the regulatory mechanism are applied in a manner that complies with the terms and conditions of this permit.	iii. Regulatory Mechanism: The applicable contracts, codes, resolutions, ordinances, and program documents used to meet the permit requirements. iv. Regulatory Mechanism Exemptions: The applicable contracts, codes, resolutions, ordinances, and program documents used to meet the permit requirements.	To be completed November 1, 2025

PDD Requirement:

CSU's construction standards require the design and construction of permanent Stormwater Control Measures (SCMs) with each project. CSU personnel maintain SCMs on land maintained by CSU. Other entities, such as STRATA, which maintain SCMs on CSU land are required to maintain SCMs and respond to requests and inspections by CSU personnel.

Title	Document Location
"Colorado State University Facilities Planning, Design and Construction Standards, Part IV Regulatory Requirements"	Colorado State University Facilities Planning, Design and Construction Standards Facilities Management Colorado State University (colostate.edu)

Part I.E.4.a.iii. Regulatory Mechanism Exemptions:

Program Requirements (Part I.E.4.a)	Recordkeeping (Part I.E.4.b)	Compliance Schedule
iii. Regulatory Mechanism Exemptions: Procedures must be implemented to ensure that any exclusions, exemptions, waivers, and variances included in the regulatory mechanism are applied in a manner that complies with the terms and conditions of this permit.	iv. Regulatory Mechanism Exemptions: The applicable contracts, codes, resolutions, ordinances, and program documents used to meet the permit requirements.	To be completed November 1, 2025

PDD Requirement:

CSU does not issue waivers or exemptions to “Part IV, Regulatory Requirements” of the “Colorado State University Facilities Planning, Design and Construction Standards”.

Title	Document Location
“Colorado State University Facilities Planning, Design and Construction Standards, Part IV Regulatory Requirements”	Colorado State University Facilities Planning, Design and Construction Standards Facilities Management Colorado State University (colostate.edu)

Part I.E.4.a.iv. Control Measure Requirements:

Program Requirements (Part I.E.4.a)	Recordkeeping (Part I.E.4.b)	Compliance Schedule
iv. Control Measure Requirements: The permittee’s requirements and oversight for applicable development sites must be implemented to address the selection, installation, implementation, and maintenance of control measures in accordance with requirements in Part I.B. The “base design standard” is the minimum design standard for new development and redevelopment. All control measures must also be sized and designed for the drainage area of the control measure installed; as necessary to meet the post-construction requirements of the applicable development site. The control measures for applicable development sites shall meet one of the following base design standards listed below: (A) WQCV Standard (B) Pollutant Removal Standard (C) Runoff Reduction Standard (D) Applicable Development Site Draining to a Regional WQCV Control Measure (E) Applicable Development Site Draining to a Regional WQCV Facility (F) Constrained Redevelopment Sites Standard (G) Previous Permit Term standard	v. Control Measure Requirements: The applicable contracts, codes, resolutions, ordinances and program documents used to meet the permit requirements, including the procedures to determine which design standard applies to each applicable development site and the design specifications for each design standard (if applicable). Any excluded area of the applicable development site, regardless of the type of design standard, must be documented. When approving a Constrained Redevelopment Design Standard, the permittee must document why it was not practicable for the applicable development site, or any portion of the applicable development site, to use another design standard.	To be completed November 1, 2026

PDD Requirement:

CSU’s construction standards specify SCM design standards, including treatment of 100 percent of the WQCV. The project’s drainage report must identify any areas where it is impracticable to treat stormwater, and treatment of an equivalent area outside of the project boundary is required.

Title	Document Location
“Colorado State University Facilities Planning, Design and Construction Standards, Part IV Regulatory Requirements”	Colorado State University Facilities Planning, Design and Construction Standards Facilities Management Colorado State University (colostate.edu)

Part I.E.4.a.v. Site Plan Requirements:

Program Requirements (Part I.E.4.a)	Recordkeeping (Part I.E.4.b)	Compliance Schedule
v. Post-Construction Site Plans <u>(A) Before a structural control measure can be approved</u> by the permittee, the permittee must evaluate the applicable development site for the following: 1) Review the site for control measures that reduce runoff. The permittee's review must include consideration of ways to minimize imperviousness and directly connected impervious areas. 2) Review the site for procedural control measures that could reduce stormwater pollution, including covering storage and handling areas, spill containment and control, disposal of household waste, illicit discharge controls, good housekeeping, preventative maintenance, vehicle maintenance, fueling, and storage, use of pesticides, herbicides, and fertilizers, landscape maintenance, snow and ice management, street sweeping and cleaning, and storm sewer system cleaning. <u>(B) Site Plan Requirements:</u> Site plans that include control measures for the applicable development projects must include the following: 1) Analysis from evaluation of runoff reduction and procedural control measures from Part I.E.4.a.v(A). 2) Design details for all structural control measures implemented to meet the requirements of Part I.B.4. 3) A narrative reference for all non-structural control measures for the project, if applicable. 4) Documentation of operation and maintenance procedures to ensure the long term observation, maintenance, and operation of the control measures. The documentation shall include frequencies for routine inspections and maintenance activities. 5) Documentation regarding easements or other legal means for access of the control measure sites for operation, maintenance, and inspection of control measures. <u>(C) Site Plan Review:</u> The permittee shall implement a plan review process for the control measures. The plan review shall include the following minimum requirements designed to	vi. Site Plans: Copies of final site plans for all applicable development sites. The final site plans must contain the information below. (A) For all sites for which the stormwater runoff going to a regional WQCV control measure or facility is applied: the name and location of the regional WQCV control measure/facility and documentation that the regional WQCV control measure/facility has the capacity for the applicable development site. Procedures to track the drainage area and post-construction projects contributing to the regional control measure. (B) For all sites for which the constrained redevelopment sites standard is applied: The site plan and the permittee's written determination that it is not practicable to meet any of the other design standards in Parts I.E.4.a.iv(A) (B), and (C). The permittee's written determination shall include an evaluation of the applicable redevelopment sites ability to install a control measure without reducing surface area covered with the structures. (C) For all sites for which the previous permit term standard is applied: Date of the start of the permittee's review process, the permittee's approval of the site plan (if applicable), the control measure implementation, and any modifications to the site plan. (D) The applicable documentation for the operation and maintenance procedures that ensure the long-term observation, maintenance, and operation of control measures, including routine inspection frequencies and maintenance activities. (E) The applicable documentation regarding easements or other legal means for access to the control measure for operation, maintenance, and inspection of control measures.	To be completed November 1, 2026

Program Requirements (Part I.E.4.a)	Recordkeeping (Part I.E.4.b)	Compliance Schedule
prevent inadequate control measures from being implemented: 1) Confirmation that control measures were designed to meet the requirements of <u>Part I.E.4.</u> 2) Confirmation that site plans meet the requirements of <u>Part I.E.4.a.v(B).</u> 3) Post Construction Site Plan Revisions: (a) Major Modifications. Changes to the original site plan that remove or add additional area to the project, modify the final hydrology or drainage of the final design, replace an approved site plan, or otherwise expands or contracts the scope of the original project shall require the submission of plans to the permittee for review and approval. (b) Minor Modifications. Modifications to the original site plan that do NOT increase the scope or change hydrology of the project but modifies/improves specific control measures used or specifies the relocation of previously approved control measures within the project shall be made in the field by the construction site owner/operator and thoroughly documented in the site plan narrative and/or drawings. If the permittee determines there are significant site plan revisions or updates that reflect changes to critical control measures that may result in an illicit discharge to the MS4 or state waters, the permittee must approve or require approval of those control measure revisions. The permittee must review these revisions during inspections, determine if the permittee approves, and show in some way (like initialing the map or through an electronic log) that the permittee approves of the minor modifications. (c) The permittee will only approve a major and minor modification if the modification meets the applicable requirements of <u>Part I.E.4.a.v(A)</u> and <u>(B).</u>		

PDD Requirement:

CSU's design review process includes review by subject matter experts at the Schematic Design, Design Development and Construction Documents phases. Review includes evaluation of stormwater control measure (SCM) design, drainage report and compliance with Part IV Regulatory Requirements.

Upon substantial completion of a project, long term maintenance of newly installed SCMs is incorporated into CSU's work management system, AiM, by establishing the SCM as an asset, and creating a recurring work order and preventative maintenance template for it.

Title	Document Location
"Colorado State University Facilities Planning, Design and Construction Standards, Part II Design Standards"	Chapter 02 - Design Administration (colostate.edu)
"Colorado State University Facilities Planning, Design and Construction Standards, Part IV Regulatory Requirements"	Colorado State University Facilities Planning, Design and Construction Standards Facilities Management Colorado State University (colostate.edu)

Part I.E.4.a.vi. Construction Inspection and Acceptance and Post Acceptance Oversight Site Inspection:

Program Requirements (Part I.E.4.a)	Recordkeeping (Part I.E.4.b)	Compliance Schedule
vi. Final Construction Inspection and Acceptance: The permittee must implement inspection and acceptance procedures to ensure that control measures are installed and implemented in accordance with the site plan and include the following: (A) Confirmation that the completed control measure operates in accordance with the approved site plan. (B) All applicable development sites must have operational permanent water quality control measures at the completion of the site. In the case where permanent water quality control measures are part of future phasing, the permittee must have a mechanism to ensure that all control measures will be implemented, regardless of completion of future phases or site ownership. In such cases, temporary water quality control measures must be implemented as feasible and maintained until removed or modified. All temporary water quality control measure must meet one of the design standards in Part I.E.4.a.iv.	vii. Construction Inspection and Acceptance: Maintain records of inspections conducted during construction and the permittee's acceptance of the control measure(s), including the process and tools used for documenting inspection, the process for inspection follow-up, including determining, implementing, and documenting the nature of the follow up action.	To be completed November 1, 2026

PDD Requirement:

CSU projects involving new buildings, building additions or roadway projects include a Building Inspection Record (BIR), issued by the Facilities Management Building Department, which includes a stormwater inspection item. When a project includes a SCM, the Facilities Management Utilities Group inspects stormwater aspects of the project. When completed per the design documents and this permit, the Utilities Group person signs the BIR to indicate acceptance by CSU.

Title	Document Location
Building Inspection Record (BIR)	https://www.fm.colostate.edu/buildingdepartment/

Part I.E.4.a vi. Post Acceptance Oversight:

Program Requirements (Part I.E.4.a)	Recordkeeping (Part I.E.4.b)	Compliance Schedule
vii. Long-Term Operation and Maintenance and Post Acceptance Oversight: The permittee must implement written procedures which include the following minimum requirements to ensure adequate long-term operation and maintenance of control measures installed under previous and current permits that are owned by the permittee to ensure that they are functioning as designed: (A) Procedures to track the location, operator (if different than the permittee), operator contact information, type, and maintenance of each control measure. (B) Procedures to enforce the requirements for the operator (if different than the permittee) to implement and maintain control measures when necessary. (C) Where the permittee owns the control measure but a different entity (excluding the permittee's contractors) performs control measure operation and maintenance, the permittee shall perform oversight inspections. For oversight inspections, the permittee must inspect all control measures installed under previous permits and this permit at a frequency that it determines to ensure that the control measure is functioning as designed and is in compliance with the site plan, however, the permittee shall inspect the control measure at least once every 5 years. If the site plans for control measures installed under previous permits are unavailable the permittee must determine during the inspection whether the control measure meets the requirements of Part I.B. Oversight inspections shall include the inspection of field conditions and control measures to confirm conformity with the site plan, identify any inadequate control measures, and identify control measures requiring routine maintenance, such as trash removal. If the permittee owns the control measure and performs operation and maintenance procedures	vii. Post Acceptance Oversight: Maintain inspection records with the following minimum information for all inspections conducted to meet the minimum inspection frequency in Part I.E.4: (A) Inspection date (B) Name of inspector and whether the inspector is the permittee (including the permittee's contractor) or is another entity. (C) Control measure identification, including the type of control measure (D) Confirmation that the control measure operates in accordance with the approved plan (E) Inspection findings including, when present: inadequate control measures and control measures requiring routine maintenance (F) Confirmation that the control measure is operating as designed or a list of follow up actions (G) Date the follow up actions were completed (H) Type of inspection (oversight or operation and maintenance) (I) Indication of whether the permittee performs operation and maintenance inspections or whether another entity (other than the permittee's contractor) performs operation and maintenance inspections. viii. Permittees only have to keep the inspection records for the bi-annual and once per five year inspections. Permittees do not have to keep records for inspections conducted more frequently than required by this permit.	To be completed November 1, 2026

Program Requirements (Part I.E.4.a)	Recordkeeping (Part I.E.4.b)	Compliance Schedule
themselves or through a contractor, then the permittee is not required to conduct the once per 5-year oversight inspections. In addition to the permittee oversight inspections once every 5 years, the permittee must ensure that the operator of the control measure installed under this permit must also perform operation and maintenance inspections at a frequency that the permittee determines will ensure that the control measure is functioning as designed or at a minimum of twice per year. All functional elements of control measures shall be inspected during operation and maintenance inspections.		

PDD Requirement:

With a handful of exceptions, CSU personnel conduct inspections of CSU's SCMs. Each SCM is defined as an asset and incorporated into AiM, the work management system. Inspection work orders are assigned to an appropriate group within Facilities Management and are automatically issued twice each year for each SCM's inspection. If maintenance of an SCM is required, specifics are entered into AiM, and the maintenance task assigned to an appropriate group within Facilities Management. When maintenance is complete the work order is closed and the inspection and associated documentation is stored in AiM for future retrieval if required.

The handful of SCMs that are not inspected by CSU personnel include those operated and inspected by STRATA. The CSU environmental specialist at Facilities Management coordinates with STRATA on inspections and maintenance and documents the inspections annually.

Title	Document Location

Part I.E.4.a.viii. Enforcement Response:

Program Requirements (Part I.E.4.a)	Recordkeeping (Part I.E.4.b)	Compliance Schedule
viii. Enforcement Response: Implement appropriate written enforcement procedures and actions to meet the requirements of Part I.E.4. Where the permittee owns the control measure but a different entity (excluding the permittee's contractors) performs control measure operation and maintenance, the permittee must have processes and sanctions to minimize the occurrence of, and obtain compliance from chronic and recalcitrant violators of control measure requirements. (A) The permittee must follow the written enforcement procedures. Written enforcement procedures must include informal, formal, and judicial enforcement responses. The permittee must require enforcement escalation as necessary based on the severity of violation and/or the recalcitrance of	ix. Enforcement Response: The document(s) must detail the types of escalating enforcement responses the permittee will take in response to common violations and time periods within which responses will take place. Must include any reports developed in accordance with enforcement escalation requirements in Part I.E.4.a.viii.	To be completed November 1, 2025

Program Requirements (Part I.E.4.a)	Recordkeeping (Part I.E.4.b)	Compliance Schedule
the violator to ensure that findings of a similar nature are enforced upon consistently. (B) The permittee must escalate enforcement procedures if non-compliance has continued at the applicable development project for more than two inspections. If the permittee does not escalate enforcement at that time, they must document the reason why they did not take enforcement actions.		

PDD Requirement:

CSU Facilities Management oversees inspection and maintenance of SCMs that are inspected and maintained by STRATA. If two inspections per year are not performed by STRATA, CSU personnel will conduct inspections and provide written documentation to STRATA with a directive to conduct maintenance, if necessary. A follow-up inspection will be performed by CSU Facilities Management personnel within two months of the directive date. If maintenance has not been performed, CSU Facilities Management will perform the maintenance and invoice STRATA for the time and materials.

Title	Document Location
SOP	stored in an access limited network drive on the Facilities administrative network

Part I.E.4.a.ix. Tracking:

Program Requirements (Part I.E.4.a)	Recordkeeping (Part I.E.4.b)	Compliance Schedule
ix. Tracking: Implement and document procedures and mechanisms to track the location of and adequacy of operation of control measures implemented in accordance with the program.	x. Tracking for Control Measures Installed in Accordance with this Permit and Previous Permits: Maintain records of the required control measure and regional WQCV control measure information, including the type of control measure, the location of the control measure, the date it was installed, if it met a previous design standard (if applicable), if it meets the permittee's current design standard, the amount of acreage within the permittee's jurisdictional boundary that drains to the control measure, the dates of inspections, the dates of maintenance, and the dates of scheduled maintenance. If the operator is different than the permittee and is not the permittee's contractor, then the permittee must require the operator to maintain dates of control measure inspections, maintenance performed, and scheduled maintenance. The permittee must instruct the operator to make this information available to the permittee upon request. For control measures installed prior to this permit	To be completed November 1, 2025

Program Requirements (Part I.E.4.a)	Recordkeeping (Part I.E.4.b)	Compliance Schedule
	for which the permittee is the operator, the permittee must maintain known tracking information in this Part (I.E.4.b.x) for all control measures. Records must be maintained for the life of the control measure following the effective date of this permit.	

PDD Requirement:

A file folder containing SCM designs, where available, of existing SCMs (as of January 2024) will be established on a Facilities Management network. Where designs are stored in project file locations or other digital media, a word document referencing those locations will be put into the SCM design file folder.

Title	Document Location
File folder entitled: "SCM Design Documents"	stored in an access limited network drive on the Facilities administrative network

Part I.E.4.a.x. Training:

Program Requirements (Part I.E.4.a)	Recordkeeping (Part I.E.4.b)	Compliance Schedule
x. Training: Train applicable staff to inspect the control measures in accordance with the permittee's procedures in Part I.E.4.a.vi and vii. The permittee must identify those who will be likely to inspect the control measures and provide training to those individuals. The training must also include information on trash and its effects on water quality.	xi. Training: Name and title of each individual trained, date of training, the type of training, and a list of topics covered.	To be completed November 1, 2024

PDD Requirement:

The supervisor of each Facilities Management group conducting SCM inspections, including but not limited to Utilities Services, Outdoor Services, General Services, is responsible for training their personnel who conduct inspections, or delegating the training to an outside entity such as the Colorado Stormwater Center. Training episodes will be documented, and documentation maintained by the Facilities Management training coordinator.

Title	Document Location
Training sign-in sheets	stored in an access limited network drive on the Facilities administrative network

Part I.E.4.a.xi. For Applicable Construction Activities that Overlap Multiple Permit Areas:

Program Requirements (Part I.E.4.a)	Recordkeeping (Part I.E.4.b)	Compliance Schedule
xi. For applicable development sites that overlap multiple permit areas (co-regulating MS4 permittee), when a written	xii. For Applicable Construction Activities that Overlap Multiple	None given.

Program Requirements (Part I.E.4.a)	Recordkeeping (Part I.E.4.b)	Compliance Schedule
agreement is in place with a co- regulating MS4 permittee the following is required: (A) Control measure requirements may be imposed on the operator in accordance with the requirements of a co- regulating MS4 permittee pursuant to the written agreement. This requirement does not apply to applicable development sites in the permit area of the Colorado Department of Transportation. (B) Site plan review/acceptance and site inspection actions may be conducted by a co- regulating MS4 permittee to meet the requirement of the permit.	Permit: Copies of any written agreements between co- regulating MS4 permittees when required by Part I.E.4.a.xi.	

PDD Requirement:

Not applicable, CSU manages its own MS4 area.

Part I.E.5. Good Housekeeping Pollution Prevention for Permittee Operations

Part I.E.5.a. Municipal Facility Runoff Control Measures:

Program Requirements (Part I.E.5.a)	Recordkeeping (Part I.E.5.b)	Compliance Schedule
ii. Permittee-owned facility runoff control measures. (A) The permittee shall maintain a list of all applicable permittee-owned facilities. Applicable facilities include the following: 1) Vehicle maintenance and washing facilities, motor pools with vehicle maintenance and washing, and loading and unloading areas. 2) Asphalt and concrete batch plants that are not subject to a separate CDPS or NPDES permit. 3) Solid-waste transfer stations where waste and recyclables are briefly held before further transport. 4) Outdoor storage yards with exposed stockpiles of materials, including stockpiles of road deicing salt, salt and sand, sand, and rotomill material, dirt, snow dumps, sweeper tailings and/or spoils, gravel. 5) Equipment storage yards. (B) The permittee shall implement control measures to prevent or reduce potential discharges of pollutants to the MS4 from the applicable permittee-owned facilities. New written procedures shall be developed and implemented for any new applicable permittee-owned facilities prior to associated pollutant sources being present. (C) The permittee shall implement the following categories of control measures as necessary to prevent or reduce the pollutant sources present: 1) Preventive maintenance 2) Good housekeeping 3) Spill prevention and response procedures 4) Structural control measures 5) Evaluation of non-stormwater discharges 6) Personnel training	i. Permittee-owned Facility Runoff Control Measures: For each applicable permittee facility and operation: (A) Facility identification (B) Description of all pollutant sources (C) Control measures implemented, including installation and implementation specifications and information (D) Staff (position title) responsible for implementation of control measures and associated documentation (E) Description of control measures implemented for bulk storage structures.	Part I.E.5.a.ii. To be completed November 1, 2024 Part I.E.5.b.i. To be completed November 1, 2025
PDD Requirement: <i>CSU owns and operates the following applicable permittee-owned facilities:</i> • <i>Vehicle maintenance and washing facilities at the Facilities South complex</i> • <i>Equipment storage yard at Foothills campus on the road leading to the solar field</i> • <i>Mount Manure on Foothills campus, an animal waste stockpile area.</i> <i>Before November 2025, CSU will develop a Standard Operating Procedure (SOP) for each location describing the location, potential sources of pollution, stormwater control measures, and the staff responsible for maintaining the stormwater control measures at each area.</i>		
Title	Document Location	
SOPs for each facility.	stored in an access limited network drive on the Facilities administrative network	

Part I.E.5.a.ii. Municipal Facility Runoff Control Measures:

Permit Requirements (Part I.E.5.a)	Recordkeeping (Part I.E.5.b)	Compliance Schedule
ii. Municipal Facility Runoff Control Measures: (D) The permittee shall implement written facility inspection procedures, which must include an annual visual inspection of each applicable permittee facility and operation, in accordance with Part I.E.5.a.ii.(D) of the permit. All inadequate control measures identified under Part 1.E.5.a.ii(D) shall be modified or replaced as soon as possible, but not later than 6 months from the visual inspection. If the permittee is unable to modify or replace the inadequate control measure within 6 months, then the permittee must complete a plan according to Part i.E.5.a.ii(E) of the permit.	(F) Maintain inspection records with the following minimum information for all inspections conducted to meet the minimum inspection frequency in Part I.E.5.a.ii(D): 1) Inspection date 2) Name of inspector 3) Applicable facility identification 4) Inspection findings including: observations of locations and areas where stormwater is discharged from the site; inadequate control measures; control measures requiring routine maintenance; and if there was any evidence of polluted discharges from the facility.	Part I.E.5.a.ii To be completed November 1, 2024 Part I.E.5.b.i. To be completed November 1, 2025

PDD Requirement:

CSU will develop an inspection checklist and program for the areas identified above and establish an annual inspection Preventative Maintenance work order for each area in AiM. The inspection work order will include a follow-up requirement for any inadequate stormwater control measures identified in an inspection.

Title	Document Location
Facilities Inspection Checklists	stored in an access limited network drive on the Facilities administrative network

Part I.E.5.a.iii Municipal Operations and Maintenance Procedures:

Permit Requirements (Part I.E.5.a)	Recordkeeping (Part I.E.5.b)	Compliance Schedule
iii. Permittee Operations and Maintenance Procedures: The permittee shall implement control measures that prevent or reduce discharges for applicable permittee operations that are not covered under Part I.E.5.a.ii(A). New written procedures	ii. Permittee Operations and Maintenance Procedures: Control measures implemented, including	Part I.E.5.a.iii To be completed

Permit Requirements (Part I.E.5.a)	Recordkeeping (Part I.E.5.b)	Compliance Schedule
shall be developed and implemented for any new applicable permittee operations prior to associated pollutant sources being present. (A) At a minimum, implementation of the procedures must prevent or reduce stormwater pollution from the following operations conducted by the permittee: • Operation and maintenance of streets, roads, highways • Operation and maintenance of permittee parking lots • Operations at maintenance and storage yards • Operations at maintenance shops with outdoor storage areas • Operation and maintenance of snow dumps/snow disposal areas • Operation and maintenance of sites used for temporary storage of sweeper tailings or other waste piles • Park and open space maintenance • Building maintenance • New construction of permittee facilities • Application of pesticides, herbicides, and fertilizers • Large outdoor festivals and events • Construction activities not subject to the requirements of Part I.E.3. Page 46 of 87 Permit No. COR070000 • Maintenance, replacement, and construction of utilities and the storm system, including operations, such as storage, dewatering, or disposal, associated with removal of sediment, debris, trash, and other pollutant sources from the MS4, including removal of materials, such as trash, from control measures implemented in accordance with Part I.E.4, unless covered by a separate CDPS or NPDES permit. • Firefighting training and emergency operations. (see Part I.E.5.iii(A))	installation and implementation information	November 1, 2024 Part I.E.5.b.ii To be completed November 1, 2025

PDD Requirement:

Before November 2024, each of the operations or functions listed above will be evaluated for stormwater management. Written SOPs will be developed which identify potential pollutants and stormwater control measures that can be used to reduce stormwater pollution.

Title	Document Location
SOPs	stored in an access limited network drive on the Facilities administrative network

Part I.E.5.a.iv. Nutrient Source Reductions:

Permit Requirements (Part I.E.5.a)	Recordkeeping (Part I.E.5.b)	Compliance Schedule
iv. Nutrient Source Reductions: The permittee shall implement a pollution prevention program that has the ultimate goal of preventing or reducing nitrogen and phosphorus in stormwater runoff associated with the applicable permittee operations and facilities. A. The permittee shall evaluate, identify, and document the permittee operations and facilities that are and/or have the potential to contribute nitrogen or phosphorus to the waters receiving the discharge authorized under this permit. The permittee is authorized to meet the requirements of this section through contribution to a collaborative program to evaluate, identify, and target sources state-wide or within the specific region or watershed that includes the receiving waters impacted by the permittee's discharge(s). At a minimum, 1) If the permittee has any operations that use fertilizers, then the permittee shall include the storage and application of fertilizer, including subsequent stormwater or irrigation runoff from areas where fertilizer has been applied, as an identified permittee operations nutrient source. 2) If the permittee has any operations that use deicers containing phosphorus, then the permittee shall include the storage and application of deicers as an identified permittee operations nutrient source. B. Where a permittee operation has been identified under (A) as a potential source of nitrogen or phosphorus, the permittee shall implement control measures that prevent or reduce the nutrient identified (nitrogen and/or phosphorus) from entering stormwater runoff. The control measures shall be implemented and documented in accordance with <u>Part I.E.5.a.ii</u>, if associated with an applicable permittee facility, or in accordance with <u>Part I.E.5.a.iii</u>, if associated with an applicable permittee operation.	iii. Nutrient Source Reductions: Control measures implemented to prevent or reduce nitrogen and phosphorus from permittee operations, including product substitution, installation and implementation information.	To be completed November 1, 2025

PDD Requirement:

The following are operations at CSU that can potentially introduce nutrients, primarily nitrogen, into stormwater runoff, and that can potentially realize a reduction in nutrient loading.

<i>Location</i>	<i>Department</i>
<i>South campus, Sheep and llama pens</i>	<i>Animal science</i>
<i>Foothills Campus, Mount Manure</i>	<i>CVMBS, Equine Science</i>
<i>Foothills Campus, Bison pens at NWRC</i>	<i>NWRC/CVMBS</i>
<i>Foothills Campus, Sheep Pen area</i>	<i>Animal science</i>
<i>Foothills Campus, horse pens south of Rampart Road</i>	<i>Equine science</i>
<i>Campus-wide: fertilizer application on turf areas</i>	<i>Grounds group, FM</i>
<i>Foothills Campus, Colorado State Forest Service nursery fertilizer usage</i>	<i>CSFS</i>

Education, training and/or posters tailored to each user and area were developed and distributed between May 2023 and May 2024.

Title	Document Location
Nutrient reduction training PowerPoint and posters	stored in an access limited network drive on the Facilities administrative network

Part I.E.5.a.v. Outdoor Bulk Storage:

Permit Requirements (Part I.E.5.a)	Recordkeeping (Part I.E.5.b)	Compliance Schedule
v. Outdoor Bulk Storage: Outdoor bulk storage structures, of more than 55 gallons, for petroleum products and any other liquid chemicals located at applicable permittee facilities must have control measures implemented that provide secondary containment or equivalent protection that contains all spills and prevents any spilled material from entering state waters. For the scenario of a single containment system serving multiple tanks, the containment system must have sufficient capacity to contain 10% of the volume of containers, or the volume of the largest container plus 10%, whichever is greater. Bulk storage on mobile refuelers that are subject to the authority and control of the U.S. Department of Transportation, as defined in the Memorandum of Understanding between the Secretary of Transportation and the Administrator of EPA, dated November 24, 1971 are not subject to the requirements of Part I.E.5.a.v. Prior to the compliance date in Part I.H, the permittee must implement practices, such as spill prevention and response, to prevent or reduce pollutants in runoff associated with bulk storage structures.	None.	To be completed November 1, 2026

PDD Requirement:

CSU has a Spill Prevention Control and Countermeasure (SPCC) plan in place for bulk storage of oils, including petroleum products.

Liquid bulk storage of chemicals not included in the SPCC plan include:

- *Liquid chemicals periodically stored outside the RCS shop on South Campus*
- *Liquid chemicals periodically stored outside in the vicinity of the Engineering Research Center on Foothills Campus.*

These storage areas will be equipped with secondary containment before November 2026.

Title	Document Location
Spill Prevention, Control and Countermeasure Plan	stored in an access limited network drive on the Facilities administrative network

Part I.E.5.a.vi. Use of Fire Fighting Foam in Training Activities and Emergencies

Permit Requirements (Part I.E.5.a)	Recordkeeping (Part I.E.5.b)	Compliance Schedule
vi. Use of Fire Fighting Foam in Training Activities and Emergencies: The permittee must prohibit the use of Class B firefighting foam that contains intentionally added perfluoroalkyl and polyfluoroalkyl substances for training or testing purposes. For emergency use, the permittee shall evaluate whether a Class B fluorine-free foam can provide the required performance for the specific hazard. Fluorinated Class B foams should only be used in situations of significant flammable liquid hazard with risk for public safety or significant property loss, where the performance of other foams has not been demonstrated to date. However, the provisions of this Part (I.E.5.a.vi) shall not apply to firefighting training, testing or emergency operations when the use of Class B firefighting foam containing perfluoroalkyl and polyfluoroalkyl substances is authorized by federal law.	iv. Documentation of whether Class B fire fighting foams containing perfluoroalkyl substances are used, the locations of that use, and, if used, an evaluation of whether alternatives are available. However, documentation associated with the provisions of this Part (I. E.5.a.vi) shall not apply to firefighting training, testing or emergency operations when the use of Class B firefighting foam containing perfluoroalkyl and polyfluoroalkyl substances is authorized by federal law.	Part I.E.5.a.vi Evaluate alternatives To be completed November 1, 2025 Part I.E.5.b.iv To be completed May 1, 2025

PDD Requirement:

CSU does not use fire fighting foam. The Poudre Fire Authority (PFA) leases land from CSU for its training facility on Foothills Campus. Based on email correspondence received from PFA, no firefighting foam that contains intentionally added perfluoroalkyl and polyfluoroalkyl substances is used at the training facility.

Title	Document Location
Email correspondence and survey.	stored in an access limited network drive on the Facilities administrative network

Part I.E.5.a.vii.Training:

Permit Requirements (Part I.E.5.a)	Recordkeeping (Part I.E.5.b)	Compliance Schedule
vii. Training: (A) The permittee must train applicable permittee staff to implement the Pollution Prevention/Good Housekeeping for permittee-owned facilities and operations. (B) The permittee must identify those who will be likely to inspect the control measures and provide training to those individuals that will conduct inspections in accordance with Part I.E.5.a.ii and Part I.E.5.a.iii. (C) The program must inform permittee staff responsible for operations with the potential to result in an illicit discharge about the permittee's prohibitions against, and potential impacts associated with, illicit discharges from permittee operations. The training must also include information on trash and its effects on water quality.	v. Training: Name and department of each individual trained, date of training, the type of training, and a list of topics covered.	Part I.E.5.a.vii To be completed November 1, 2024 Part I.E.5.b.v To be completed November 1, 2025

PDD Requirement:

Before November 2024, CSU will identify and develop inspection forms for the CSU-owned facilities. Before November 2025, CSU will conduct and document training of relevant personnel. The facilities include:

Vehicle maintenance and washing facilities at Facilities South

Foothills Storage Area along road to Mt Manure

Mount Manure, east area and west area

Title	Document Location
Training sign-in sheets	stored in an access limited network drive on the Facilities administrative network