



STORMWATER

QUALITY MANAGEMENT



Project #: DES19210



CITY OF DESOTO

Compliance Guide

TCEQ Small MS4 Permit No. TXR040073

Permit Term: Jan. 24, 2019 - Jan. 23, 2024

Introduction

This Compliance Guide serves as a reference to assist staff with implementation and documentation of the Best Management Practices (BMPs) of the City's Stormwater Management Program (SWMP). This Guide is intended to provide supplemental descriptive information for use in identifying what activities to conduct, what information to document, and what results to report for each BMP. Specific guidance is provided in the Compliance Guide for each BMP and directly coincides with Appendix A of the SWMP.

Each BMP Guide is broken into six general sections, as described below:

Responsible Department(s)

The City department(s) with assigned responsibility for conducting, documenting, and reporting activities for the BMP.

Measurable Goal and Objectives

The measurable goals for the BMP derived directly from Appendix A of the City's SWMP.

Documentation Guidance

A summary of the measurable goals and overall guidance associated with the BMP.

Reference Material

Sources of readily available material to be utilized during SWMP implementation and compliance documentation.

Compliance Documentation

The documentation that the City must maintain on file to maintain compliance. This documentation will need to be readily available to TCEQ or EPA upon request to verify implementation of BMPs according to the provisions of the SWMP.

Annual Report Documentation

Final reporting numbers to include in the annual report as a measurement of success of the BMP. Typically, these numbers will reflect the total quantities or measurements identified within the Measurable Goals and Objectives section and tracked as described in the Compliance Documentation section.

The compliance guide is a tool to assist with compliance documentation. However, this document is made to be fluid. If changes are made to the City's Stormwater Management Program, this document should be adjusted accordingly. Additionally, this document contains information and examples, but compliance is not limited to the listed activities and examples. All pertinent documentation that is associated with the BMP activities must be maintained and made readily available at the TCEQ's request.

BMP 1 – Distribute Educational Material

Responsible Department(s)

Utility Billing; Public Information Officer

Measurable Goal and Objectives

Years 1 – 5 Measurable Goals
A. Distribute educational material about stormwater pollution prevention and the hazards associated with illegal discharges and improper disposal of waste by December of each year. <ul style="list-style-type: none">i. Develop and distribute educational material for at least 3 stormwater pollution prevention topics.ii. Utilize at least 3 methods of distribution.iii. Reach at least 3 target audiences.
Compliance Requirements: Part III, Section B.I(a) Public Education and Outreach and (b) Public Involvement

Documentation Guidance

This BMP commits the City to development of a stormwater education and outreach program to educate public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste and about the impact that stormwater discharges can have on local waterways, as well as the steps that the public can take to reduce pollutants in stormwater.

The following information about the program should be documented in a memo to file:

- Goals and objectives of program
- Identification of high-priority, community-wide issues, for example:
 - Reduction in illegal dumping
 - Improvement of the quality of discharges to receiving waters

Reference Material

Several sources of readily available educational materials exist, including:

- NPS Outreach Toolbox: <https://cfpub.epa.gov/npstbx/index.html>
- NCTCOG Pollution Prevention Resources: <https://www.nctcog.org/envir/watershed-management/stormwater/pollution-prevention>
- US EPA YouTube Channel: <https://www.youtube.com/user/USEPAgov/featured>

BMP 1 – Distribute Educational Material

A summary of potential topics and target audiences is provided below:

Potential Topics	Potential Target Audiences
Alternatives to Toxic Substances	Public Employees, Businesses, General Public
Automobile Maintenance	Public Employees, Businesses, General Public
Chlorinated Water Discharge Options	Public Employees, Businesses, General Public
Disposal of Household Hazardous Wastes	General Public
Fats, Oils, and Grease	Businesses, General Public
Landscaping and Lawn Care	Public Employees, Businesses, General Public
Livestock Stables	Businesses, General Public
Maintenance of Decorative Ponds	Public Employees, Businesses, General Public
On Site Sewage Facility (Septic) Management	Businesses, General Public
Only Rain Down the Storm Drain (Illegal Dumping)	Public Employees, Businesses, General Public
Pest Control	Public Employees, Businesses, General Public
Pesticide, Herbicide, and Fertilizer Application	Public Employees, Businesses, General Public
Pet Waste Management	General Public
Promoting Low Impact Development	Public Employees, Businesses, General Public
Residential Car Washing	General Public
Sanitary Sewer Overflows	Businesses, General Public
Trash and Debris Management	Public Employees, Businesses, General Public
Water Conservation Practices	Public Employees, Businesses, General Public

BMP 1 – Distribute Educational Material

Compliance Documentation

The following information should be recorded for compliance documentation and for reference during annual reporting:

- Copies of educational material
- Topic (reference from above)
- Target audience (reference from above)
- Distribution date and/or date material was available
- Method of distribution; examples include:
 - Post on municipal website/social media
 - Pamphlets at municipal offices, library, community center, etc.
 - Utility bill inserts
 - Storm drain markings
 - Billboards/road signage
 - TV/radio advertisements
 - Posters at municipal facilities
 - Internal staff newsletters
 - Book covers for elementary school students
 - Flyers, buttons, stickers, handouts, etc.
- Quantification of materials distributed; examples include:
 - Views on website/social media
 - Clicks on links
 - Materials printed
 - Materials sent

The sample table below shows the basic content to document may be used for record keeping, or the information may be stored in an electronic database, such as Microsoft Access or Excel:

Topic	Target Audience	Date	Method of Distribution	Number	Unit
Fats, Oils, and Grease	Businesses	01/01/2019	Mail	##	Utility Bill Inserts
“Only Rain Down the Storm Drain”	General Public	01/02/2019	Facebook Post	##	Views

BMP 1 – Distribute Educational Material

Annual Report Documentation

A summary of the information above covering January 1 to December 31 of the prior year will need to be provided to John Crear by January 31 of each year for inclusion into the City's MS4 annual report to the TCEQ. The annual report documentation should include the following:

- # of website views/link clicks
- # of stormwater pollution prevention topics utilized (≥ 3)
- # of methods used for distribution (≥ 3)
- # of educational material distributed
- # of target audiences and name of audience (≥ 3)

BMP 2 – Stormwater Reporting by Public

Responsible Department(s)

Public Information Officer; Action Center; Information Technology; Engineering Department

Measurable Goal and Objectives

Years 1 – 5 Measurable Goals

- A. Facilitate public reporting of stormwater quality concerns and illicit discharges.
- i. Maintain at least 1 mechanism for the public to submit stormwater quality reports.
 - ii. Ensure the stormwater reporting mechanism is publicly accessible 95% of the time.
 - iii. Respond to stormwater quality reports within 2 business days; if the public report concerns an immediate threat to human health or the environment, respond within 24 hours from when the notification is received.

Compliance Requirements: Part III, Section B.1(b) Public Involvement, B.2(c)(3) Public Reporting, and B.3(b)(6) Information Submitted by the Public

Documentation Guidance

This BMP commits the City to:

1. Maintaining a mechanism for public reporting of stormwater quality concerns and illicit discharges
2. Developing written procedures for responding to and resolving stormwater quality reports

Compliance Documentation

Stormwater reporting by the public must be documented and maintained for all stormwater reporting methods. The following information should be recorded for compliance documentation and for reference during annual reporting:

- Mechanism(s) used for stormwater report (e.g. website, phone call, phone application, email, etc.)
- Log of stormwater reporting by public (See: *Stormwater Reporting Hotline Incident Tracking Sheet*)
- Response forms (See: *BMP 5 – Illicit Discharge and Spill Inspection, Investigation, and Response Form*)
- Maintain one copy of written procedures for receipt of information from public

The following document shows a generic incident tracking sheet and may be used for record keeping, or the information may be stored in a spreadsheet, an electronic database, the City's tracking system or another documentation system.

BMP 2 – Stormwater Reporting by Public**Stormwater Reporting Hotline Incident Tracking Sheet****Incident ID:****Responder Information**

Recorded by:

Report date:

Position:

Report time:

Reporter Information

Reported by:

Requests follow-up (Y/N):

Contact information (*optional*):**Incident Location** (*complete one or more below*)

Latitude and longitude:

Stream, address, or outfall #:

Closest street address:

Nearby landmark:

Narrative description of location:

Incident Report

Incident time:

Incident date:

Description of problem/incident:

Suspected Violator (name, personal or vehicle description, license plate #, etc.):

Investigation Notes (*note date/time of investigation and follow-up actions needed*)**Response Action Report**

Response time:

Response date:

Response Action Notes

BMP 2 – Stormwater Reporting by Public

Annual Report Documentation

A summary of the information above covering January 1 to December 31 of the prior year will need to be provided to John Crear by January 31 of each year for inclusion into the City's MS4 annual report to the TCEQ. The annual report documentation should include the following:

- # of reporting mechanisms utilized (≥ 1)
- # of stormwater reports received from public
- Annual percentage of time that public stormwater reporting was accessible ($\geq 95\%$)
- Response time (within 2 business days)
- # of responses requiring action for resolution

BMP 3 – Public Involvement Opportunities

Responsible Department(s)

Community Initiatives; Public Information Officer

Measurable Goal and Objectives

Years 1 – 5 Measurable Goals
A. Facilitate public involvement and education for stormwater pollution prevention activities by December of each year. <ul style="list-style-type: none">i. Provide at least 2 public involvement opportunities for stormwater pollution prevention.ii. Engage at least 2 target audiences.
B. Consider and facilitate public input in the implementation of the program. <ul style="list-style-type: none">i. Provide one opportunity for public to provide feedback on the SWMP during the public comment period.
Compliance Requirements: Part III, Section B.I(a) Public Education and Outreach and (b) Public Involvement

Documentation Guidance

This BMP commits the City to providing opportunities for public involvement in stormwater pollution prevention activities and programs to protect local water resources.

It is encouraged that the City develop goals and objectives for the program, for example:

- Reduction in illegal dumping
- Public engagement and involvement
- Improvement of the quality of discharges to receiving waters

Reference Material

Several sources of readily available public involvement material exist, including:

- National Menu of Best Management Practices (BMPs) for Stormwater: <https://www.epa.gov/npdes/national-menu-best-management-practices-bmps-stormwater#edu>
- NCTCOG Pollution Prevention Resources: <https://www.nctcog.org/envir/watershed-management/stormwater/pollution-prevention>
- US EPA YouTube Channel: <https://www.youtube.com/user/USEPAgov/featured>

BMP 3 – Public Involvement Opportunities

A summary of potential opportunities and target audiences is provided in the table below:

Potential Opportunities	Potential Target Audiences
Public Meetings	Public Employees, Businesses, General Public
Watershed Organization	Public Employees, Businesses, General Public
Wetland Plantings	Public Employees, General Public, Senior Citizens, Children/Schools
Advisory/Partner Committees	Public Employees, General Public, Contractors, Site Operators
Citizen Panels	Public Employees, General Public
Volunteer Water Quality Monitoring	Public Employees, General Public
Volunteer Educators/Speakers	Public Employees, General Public, Senior Citizens, Children/Schools
Storm Drain Stenciling	Public Employees, Businesses, General Public
Community Clean-Ups	Public Employees, General Public, Senior Citizens, Children/Schools
Citizen Watch Groups	General Public
Adopt-a Street/Stream/Median/Storm Drain	General Public, Children/Schools, Senior Citizens
Reforestation Program	General Public, Children/Schools, Businesses, Public Employees
Partnerships with Scouts, School Groups, Texas Parks and Wildlife Departments	Children/Schools, Public Employees, General Public

BMP 3 – Public Involvement Opportunities

Compliance Documentation

The following information should be recorded for compliance documentation and for reference during annual reporting:

- Public involvement opportunity advertisement, for example:
 - Website screenshot
 - Flyer
 - Social media
 - Email
 - Radio/TV advertisements
- Advertisement of public notice of Stormwater Management Program, for example:
 - City website screenshot
 - Email
 - Newsletter
- Copies of all public input, for example:
 - Emails received
 - Comments
 - Phone calls
- Response to public feedback, if needed, for example:
 - Public meetings
 - Stakeholder meetings
 - Watershed management meetings

BMP 3 – Public Involvement Opportunities

The sample table below shows the basic content to document may be used for record keeping, or the information may be stored in an electronic database, such as Microsoft Access or Excel:

Opportunity	Target Audience	Date	Number of Participants	Number of Comments Received	Amount of Trash Collected
Volunteer Educator/Speaker	Public Employees, General Public	01/01/2019	##	##	NA
Citizen Panel	Public Employees, General Public	01/02/2019	##	##	NA
Adopt-a-stream	Public Employees, General Public, Businesses, Children	01/03/2019	##	NA	##

Annual Report Documentation

A summary of the information above covering January 1 to December 31 of the prior year will need to be provided to John Crear by January 31 of each year for inclusion into the City's MS4 annual report to the TCEQ. The annual report documentation should include the following:

- # and date of public involvement opportunities (≥ 3)
- # of participants for each
- # of target audiences reached (≥ 2)
- # of educational materials distributed at involvement opportunity (also in BMP 1)
- Date of comment period
- # of comments, if any
- Date of response to comments, if any

BMP 4 – Storm Sewer System Map and Facility Inventory

Responsible Department(s)

Engineering Department

Measurable Goal and Objectives

Year 1 Measurable Goals
<ul style="list-style-type: none"> A. Develop one TCEQ approved approach to evaluate the City's current MS4 system map, including the development of an inventory of City-owned facilities and structural controls as defined in the permit. <ul style="list-style-type: none"> i. Document the approach in one memo to file by December. B. Map 100% of Waters of the U.S. directly receiving stormwater discharges from the MS4 by December.
Year 2 Measurable Goals
<ul style="list-style-type: none"> A. Evaluate the existing map of the City's MS4 system, including the inventory of City-owned facilities and structural controls as defined in the permit. <ul style="list-style-type: none"> i. Document updates needed to map in one memo to file by December.
Year 3 Measurable Goals
<ul style="list-style-type: none"> A. Update the map of the City's MS4 system to include 100% of known stormwater outfalls discharging to Waters of the U.S. by December. B. Update the facility inventory to include 100% of known City-owned facilities and structural controls by December.
Years 4 - 5 Measurable Goals
<ul style="list-style-type: none"> A. Map 100% of the City's new stormwater outfalls discharging to Waters of the U.S. within 12 months of identification or notification of installation. B. Review MS4 map and update inventory of facilities and structural controls by December of each year.
Compliance Requirements: Part III, Section B.2(c)(1) MS4 Mapping and Part III, Section B.5(b)(1) City-owned Facilities and Control Inventory

Documentation Guidance

This BMP requires the City to maintain an up to date MS4 map that shows the location of all MS4 outfalls that discharge into waters of the U.S and the name and location of all surface waters receiving discharges from the small MS4 outfalls.

This compliance requirement should be achieved through the use of GIS. The data must be able to be made available to TCEQ upon request. The following items are required to be mapped:

BMP 4 – Storm Sewer System Map and Facility Inventory

- Permittee-operated outfalls that discharge into waters of the U.S
- Name and location of all surface waters receiving discharges from outfalls
- City-owned facilities and structural controls, including but not limited to:
 - Composting facilities
 - Equipment storage and maintenance facilities
 - Fuel storage facilities
 - Hazardous waste disposal facilities
 - Hazardous waste handling and transfer facilities
 - Incinerators
 - Landfills
 - Material storage yards
 - Material storage facilities
 - Buildings, including schools, libraries, police stations, fire stations, and office buildings
 - Parking lots
 - Golf courses
 - Swimming pools
 - Public works yards
 - Recycling facilities
 - Salt storage facilities
 - Solid waste handling and transfer facilities
 - Street repair and maintenance sites
 - Vehicle storage and maintenance yards
 - Structural stormwater controls (i.e. detention ponds)

Examples of additional mapped items that are not required but can be helpful in tracking information:

- City-owned facilities
- Small MS4 Structures (manholes, pipe network, inlets, swales, etc.)
- Privately-owned structural controls
- Municipal Utility Districts
- Active construction sites
- Industrial sites
- Floatable removal devices
- On-Site Sewage Facilities (Septic)

Compliance Documentation

Year	Documentation	Measures of Program	Deadline
Year 1	<ul style="list-style-type: none"> Copy of SWMP documenting compliance approach; note date of SWMP approval in memo to file Map of Waters of the U.S (<i>Figure 2 in Stormwater Management Program</i>) 	<ul style="list-style-type: none"> Date of SWMP approval Dates and descriptions of MS4 map updates 	December 2019
Year 2	<ul style="list-style-type: none"> Document review of map and necessary updates in memo to file 	<ul style="list-style-type: none"> Date of review of map Dates and descriptions of MS4 map updates 	December 2020
Year 3	<ul style="list-style-type: none"> One copy of up-to-date MS4 map with the required mapped items Log of MS4 map updates 	<ul style="list-style-type: none"> Dates and descriptions of MS4 map updates # of all known stormwater outfalls # of city-owned facilities # of structural controls 	December 2021
Year 4 & 5	<ul style="list-style-type: none"> One copy of up-to-date MS4 map with required mapped items Log of MS4 map updates 	<ul style="list-style-type: none"> Dates and descriptions of MS4 map updates # of all stormwater outfalls # of new stormwater outfalls, if any # of structural controls 	December 2022 & 2023

BMP 4 – Storm Sewer System Map and Facility Inventory

Annual Report Documentation

A summary of the information above covering January 1 to December 31 of the prior year will need to be provided to John Crear by January 31 of each year for inclusion into the City's MS4 annual report to the TCEQ. The annual report documentation should include the following:

Year 1

- Date of SWMP approval and memo finalization
- Date of Water of the U.S. map finalization

Year 2

- Date of review of existing map
- Dates and descriptions of recommended MS4 map updates in memo to file
 - include name and # of items added/removed

Year 3

- # of all known stormwater outfalls
- # of city-owned facilities
- # of structural controls
- Dates and descriptions of MS4 map updates
 - include name and # of items added/removed

Years 4 & 5

- # of all stormwater outfalls
- # of new stormwater outfalls, if any
- # of structural controls
- Dates and descriptions of MS4 map updates
 - include name and # of items added/removed

BMP 5 – Illicit Discharge and Spill Inspection, Investigation, and Response

Responsible Department(s)

Code Enforcement; Building Inspections; Street Department

Measurable Goal and Objectives

Years 1 – 5 Measurable Goals

- A. Continue a program to inspect, investigate, and respond to notifications of spills and illicit discharges and eliminate identified sources of illicit discharge.
- Respond to 100% of notifications of spills and illicit discharge with inspections within 2 business days of receiving a notification; if the notification concerns an immediate threat to human health or the environment, respond within 24 hours of receipt of notification.
 - Notify TCEQ of 100% of spills and illicit discharges that are believed to be an immediate threat to human health or the environment within 24 hours of identification.

Compliance Requirements: Part III, Section B.2(c)(4) Procedures, (c)(5) Source Investigation and Elimination, (c)(5)c Corrective Action, and (c)(6) Inspections

Documentation Guidance

This BMP commits the City to:

- Inspection, investigation, and response to notification of illicit discharges and spills
- Elimination of the identified sources of the discharges

Illicit discharges consist of a discharge to the MS4 that is not entirely composed of stormwater, with the exception of the following allowable non-stormwater discharges:

- Water line flushing (excluding discharges of hyper chlorinated water, unless the water is first dechlorinated, and discharges are not expected to adversely affect aquatic life)
- Runoff or return flow from landscape irrigation, lawn irrigation, and other irrigation utilizing potable water, groundwater, or surface water sources
- Discharges of potable water sources that do not violate Texas Surface Water Quality Standards
- Diverted stream flows
- Rising ground waters and springs
- Uncontaminated ground water infiltration
- Uncontaminated pumped groundwater
- Foundation and footing drains
- Air conditioning condensation
- Water from crawl space pumps
- Individual residential vehicle washing
- Flows from wetlands and riparian habitats
- Dechlorinated swimming pool discharges that do not violate Texas Surface Water Quality Standards
- Street wash water excluding street sweeper wastewater
- Discharges or flows from emergency fire fighting activities; does not include washing of trucks, run-off from training activities, test water from fire suppression systems, and similar activities
- Other allowable non-stormwater discharges listed in 40 CFR § 122.26 (d)(2)(iv)(B)(1)
- Non-stormwater discharges that are specifically listed in the TPDES Multi-Sector General Permit

BMP 5 – Illicit Discharge and Spill Inspection, Investigation, and Response

(MSGP) TXR050000 or the Construction General Permit (CGP) TXR 150000

- Discharges that are authorized by a TPDES or NPDES permit or that are not required to be permitted
- Other similar occasional incidental non-stormwater discharges such as spray park water, unless the TCEQ develops permits or regulations addressing these discharges

Written procedures are required for the following aspects of the program:

- Procedures for responding to spills (includes Fire Department procedures)
- Procedures to identify and trace sources of illicit discharges
- Procedures to remove and/or correct illicit connections and discharges

Reference Material

Several sources of readily available illicit discharge program material exist, including:

- National Menu of Best Management Practices (BMPs) for Stormwater Documents:
<https://www.epa.gov/npdes/national-menu-best-management-practices-bmps-stormwater-documents>
- Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments
https://www.epa.gov/sites/production/files/2015-11/documents/idde_manualwithappendices_0.pdf
- NCTCOG Pollution Prevention Resources:
<https://www.nctcog.org/envir/watershed-management/stormwater/pollution-prevention>
- TCEQ Spills, Discharges, and Releases: <https://www.tceq.texas.gov/response/spills>

Compliance Documentation

The following should be recorded for compliance documentation and for reference during annual reporting:

- All spill and illicit discharge notifications and observations, including the stormwater reports generated by the public (BMP 2)
- Spills and illicit discharges reported to TCEQ (**State of Texas Spill Reporting Hotline: 1-800-832-8224**)
- Completed spill/IDDE response forms (See: *Stormwater IDDE Report & Response Form*)
- Completed follow-up forms, if any
- Corrective action enforced, if any

BMP 5 – Illicit Discharge and Spill Inspection, Investigation, and Response**Stormwater IDDE Report & Response Form****I. Incident Report**

Incident Number: _____

Date/Time: _____ AM / PM Received By: _____

Location: _____

Initial Report of Conditions: _____

Reported By: _____ Phone: _____

II. Investigation

Date: _____ By: _____

Location Description/Storm Drain ID/Outfall: _____

Discharge Entered Storm Drain System/Receiving Waters? ____ Yes ____ No

Material Type☐ Hazardous☐ Sediment☐ Wastewater☐ Oil/Grease☐ Other _____☐ Unknown

Est. Quantity: _____

Additional Information: _____

Sample(s) Collected: ____ Yes ____ No

Photo(s) Taken: ____ Yes ____ No

Observed Land Use☐ Residential☐ Commercial/Industrial Stormwater Permit ____ Yes ____ No ____ Unknown☐ Public

Direct/Constructed Connections Found? ____ Yes ____ No

Source Description: _____
_____Source/Responsible Party: _____
_____**III. Action and Closure**

Referred To: _____ Date: _____

Action Taken: _____

Follow-up Inspection Date (if applicable): _____

Date Closed: _____

BMP 5 – Illicit Discharge and Spill Inspection, Investigation, and Response

Annual Report Documentation

A summary of the information above covering January 1 to December 31 of the prior year will need to be provided to John Crear by January 31 of each year for inclusion into the City's MS4 annual report to the TCEQ. The annual report documentation should include the following:

- # of spills/illicit discharge inspections conducted (within 2 business days of notification, 24 hours if the notification concerns an immediate threat to human health and the environment)
- # of spills/illicit discharges confirmed
- # of spills and/or illicit discharges requiring TCEQ notification
- Response time to TCEQ notification discharge (within 24 hours of identification)
- # of illicit discharge corrective action enforcement activities
- # of illicit discharge follow-up inspections conducted

BMP 6 – OSSF Procedures

Responsible Department(s)

Engineering Department; Water/Wastewater Department

Measurable Goal and Objectives

Year 1 Measurable Goals
A. Develop one TCEQ approved approach to evaluate the City’s current program to prevent and correct failing on-site septic facilities. <ul style="list-style-type: none"> i. Document the approach in one memo to file by December. B. Refer reports of failing on-site septic facilities to jurisdictional authority within 24 hours or receipt of report. C. Request OSSF inspection reports from jurisdictional authority by December of each year.
Year 2 Measurable Goals
A. Evaluate the current program to prevent and correct failing on-site septic facilities. <ul style="list-style-type: none"> i. Document updates needed to map in one memo to file by December. B. Refer reports of failing on-site septic facilities to jurisdictional authority within 24 hours or receipt of report. C. Request OSSF inspection reports from jurisdictional authority by December of each year.
Year 3 Measurable Goals
A. Create one inventory of 100% of known OSSF within the MS4 area by December. B. Refer reports of failing OSSFs to jurisdictional authority within 24 hours or receipt of report. C. Request OSSF inspection reports from jurisdictional authority by December of each year.
Years 4 - 5 Measurable Goals
A. Maintain one copy of inventory of known OSSF within the MS4 area and update by December of each year. B. Refer reports of failing OSSFs to jurisdictional authority within 24 hours or receipt of report. C. Request OSSF inspection reports from jurisdictional authority by December of each year.
Compliance Requirements: Part III.B.2 (a)(1)e On-Site Sewage Facility Procedures.

Documentation Guidance

This BMP commits the City to:

1. Maintaining an inventory and inspection reports of on-site sanitary facilities (OSSF)
2. Notifying the appropriate personnel of failing OSSFs for correction

Written standard operating procedures should be developed for:

- OSSF inventory and inspection
- Response to reports of failing OSSF

BMP 6 – OSSF Procedures

Compliance Documentation

The following should be recorded for compliance documentation and for reference during annual reporting:

- OSSF inspection reports provided to City
- Notices of delinquency sent out for failing to provide OSSF inspection reports
- One inventory of known OSSFs within the MS4 boundary
- Inventory updates for new OSSFs and date of update

The sample table below, which shows the basic content to document, may be used for record keeping, or the information may be stored in an electronic database, such as Microsoft Access or Excel:

Address	Date of Latest Inspection Report	Status of Inspection Report	Notes
123 Main St.	01/01/2019	Current	Repairs completed 12/30/2019
456 Park Ln.	06/01/2019	Delinquent	

Annual Report Documentation

A summary of the information above covering January 1 to December 31 of the prior year will need to be provided to John Crear by January 31 of each year for inclusion into the City's MS4 annual report to the TCEQ. The annual report documentation should include the following:

- # of known OSSFs within MS4
- # of newly installed or newly discovered OSSFs within MS4, if any
- # of known failing OSSFs referred, if any
- # of OSSF inspections within MS4
- # of delinquent OSSF inspection reports
- Date of most recent OSSF inventory update

BMP 7 – Plan Review

Responsible Department(s)

Engineering Department

Measurable Goals and Objectives

Years 1 – 5 Measurable Goals

- A. Conduct engineering and construction plan reviews of site development and redevelopment projects to the standards set forth in City ordinances and design criteria to evaluate potential water quality impacts during construction and post-construction.
- i. Review 100% of plans submitted to the City prior to final acceptance of plans.
 - ii. Maintain one copy of final plan review documentation for 100% of approved construction plans.

**Compliance Requirements: Part III, Section B.3(b)(4) Construction Plan Review Procedures
Part III, Section B. 4(a)(1) Post Construction Stormwater Management Program and (b)(2) Enforcement**

Documentation Guidance

This BMP commits the City to review development plans prior to construction to make sure that the City's ordinance requirements for construction site pollution prevention (i.e., erosion and sediment control plans) and design criteria for stormwater site design (i.e., detention ponds, water quality structural controls, etc.) are followed. The compliance guide for BMP 16 contains more specific guidance about the stormwater ordinance requirements.

As a general rule:

- Construction requirements address erosion and sediment control during construction.
- Post-construction requirements address drainage design.

To comply with the commitments of this part of the MS4 permit, site development plans must be reviewed and approved by the City prior to commencement of construction activity. Reviews are to be conducted to verify site plan compliance with the City's applicable stormwater ordinances and design criteria, standards, and guidance documents. These may include but are not limited to:

- Subdivision Ordinance
- Construction Erosion Control Ordinance
- Drainage Design Criteria Manual

Compliance Documentation

Reviewers must maintain documentation for all plan reviews conducted. The following information should be recorded for compliance documentation and for reference during annual reporting.

- Construction plan review documentation
- List of plans reviewed
- Name and/or location of development
- Name of development applicant
- Name of reviewer
- Date of review
- Application status
- Date of approval

BMP 7 – Plan Review

Examples of additional documentation that are not required but can be helpful in demonstrating compliance with the requirements of this BMP include the following:

- Completed plan review checklists
- Markups on plans
- Comment-response letters with development applicants
- Meeting minutes from meetings with developers and/or City plan review staff
- Dates of final acceptance of plans

The sample table below shows the basic content to document and may be used for record keeping, or the information may be stored in a spreadsheet, an electronic database, the City's permit tracking system or another documentation system.

Name/Location of Development	Name of Applicant	Name of Reviewer	Date of Review	Application Status	Date of Approval
Broadstone at the Farmers Market 300 Witch Way	ABC Land Development Inc	C.T. Staffer	01/01/2019	Approved	01/02/2019
Vaquero Complex 2700 Main Street	Green Star	George Smith (XYZ Consulting)	01/02/2019	Requires Resubmittal	

Annual Report Documentation

A summary of the information above covering January 1 to December 31 of the prior year will need to be provided to John Crear by January 31 of each year for inclusion into the City's MS4 annual report to the TCEQ. The annual report documentation should include the following:

- # of plans submitted/reviewed
- # of plan review checklists completed
- # of plans accepted

BMP 8 – Construction Site Inspection and Enforcement

Responsible Department(s)

Engineering Department

Measurable Goal and Objectives

Years 1 – 5 Measurable Goals	
A. Conduct inspections of priority construction sites (e.g. site size, contractor performance history, sensitivity of receiving waters) within the MS4 according to City procedures and ordinances.	i. Conduct at least one site inspection of 100% of identified active priority construction sites, including evaluation of coverage under the Construction General Permit (TXR0150000).
	ii. Maintain one copy of each completed construction site inspection report.
B. Enforce correction for violations of City ordinance provisions governing construction site operations and TPDES Construction General Permit TXR150000.	i. Conduct follow-up action (i.e. inspection or enforcement) for 100% of sites with observed violations.
Compliance Requirements: Part III, Section B.2 Illicit Discharge Detection and Elimination and Part III, Section B.3(b)(5) Construction Site Inspections	

Documentation Guidance

This BMP commits the City to:

1. Identification and inspection of priority construction sites for proper erosion and sediment control practices
2. Enforcement of corrective action where violations are found in accordance with the City ordinance. The compliance guide for BMP 17 contains more specific guidance about the stormwater ordinance requirements.

Reference Material

Several sources of readily available construction site inspection guidance exist, including:

- EPA Construction General Permit Resources, Tools, and Templates:
<https://www.epa.gov/npdes/construction-general-permit-resources-tools-and-templates#inspection>
- NCTCOG Construction and Post-Construction:
<https://www.nctcog.org/envir/watershed-management/stormwater/construction>

Compliance Documentation

As a general rule, construction inspections record the following conditions at the construction site:

- | | |
|-------------------------------------|---|
| • General site information | • Material management BMPs |
| • Weather information | • Non-Stormwater management BMPs |
| • Stormwater run-on management BMPs | • Illicit discharges |
| • Erosion control BMPs | • Previous corrective action |
| • Sediment control BMPs | • CGP TXR150000 coverage/compliance |
| • Post construction BMPs | • Violations/corrective action required |

The City is required to define priority construction sites. Examples of possible selection criteria include:

- Site size (1 acre or more)
- Past performance of site operator (repeat offenders)
- Sensitivity of downstream receiving waters

BMP 8 – Construction Site Inspection and Enforcement

The following information should be recorded for compliance documentation and for reference during annual reporting:

- Construction inspection checklist/reports/photographs (one copy of each)
- Proof of TXR150000 coverage
- Enforcement of corrective action reports
- Follow-up inspection reports (within 10 business days of the observed violation)
- Photo documentation
- Written procedures for inspections, corrective action, and follow-up inspections

The sample table below shows the basic content to document and may be used for record keeping, or the information may be stored in a spreadsheet, an electronic database, the City's permit tracking system or another documentation system.

Site Location	Operator Name	Inspector Name	Date of Inspection	CGP Coverage	Violation	Enforcement Action	Follow-up Inspection	Date of Follow-up Inspection
Site ABC	XYZ Construction	City staff 1	02/12/2019	Yes	No	No	No	NA
Site DEF	ZYX Construction	City staff 2	03/20/2019	Yes	Yes	Yes	Yes	03/29/2019

The sample form below shows the basic content that should be included in the construction stormwater inspection reports.

BMP 8 – Construction Site Inspection and Enforcement

Stormwater Construction Site Inspection Report

General Information			
Project Name			
NPDES Tracking No.		Location	
Date of Inspection		Start/End Time	
Inspector's Name(s)			
Inspector's Title(s)			
Inspector's Contact Information			
Inspector's Qualifications	Insert qualifications or add reference to the SWPPP. (See Section 5 of the SWPPP Template)		
Describe present phase of construction			
Type of Inspection: <input type="checkbox"/> Regular <input type="checkbox"/> Pre-storm event <input type="checkbox"/> During storm event <input type="checkbox"/> Post-storm event			
Weather Information			
Has there been a storm event since the last inspection? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, provide: Storm Start Date & Time: Storm Duration (hrs): Approximate Amount of Precipitation (in):			
Weather at time of this inspection? <input type="checkbox"/> Clear <input type="checkbox"/> Cloudy <input type="checkbox"/> Rain <input type="checkbox"/> Sleet <input type="checkbox"/> Fog <input type="checkbox"/> Snowing <input type="checkbox"/> High Winds <input type="checkbox"/> Other: Temperature:			
Have any discharges occurred since the last inspection? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, describe:			
Are there any discharges at the time of inspection? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, describe:			

BMP 8 – Construction Site Inspection and Enforcement

Site-specific BMPs

- *Number the structural and non-structural BMPs identified in your SWPPP on your site map and list them below (add as many BMPs as necessary). Carry a copy of the numbered site map with you during your inspections. This list will ensure that you are inspecting all required BMPs at your site.*
- *Describe corrective actions initiated, date completed, and note the person that completed the work in the Corrective Action Log.*

	BMP	BMP Installed?	BMP Maintenance Required?	Corrective Action Needed and Notes
1		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
2		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
3		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
4		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
5		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
6		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
7		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
8		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
9		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
10		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
11		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
12		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
13		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
14		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
15		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
16		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
17		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
18		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
19		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
20		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	

BMP 8 – Construction Site Inspection and Enforcement

Overall Site Issues

Below are some general site issues that should be assessed during inspections. Customize this list as needed for conditions at your site.

	BMP/activity	Implemented?	Maintenance Required?	Corrective Action Needed and Notes
1	Are all slopes and disturbed areas not actively being worked properly stabilized?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
2	Are natural resource areas (e.g., streams, wetlands, mature trees, etc.) protected with barriers or similar BMPs?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
3	Are perimeter controls and sediment barriers adequately installed (keyed into substrate) and maintained?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
4	Are discharge points and receiving waters free of any sediment deposits?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
5	Are storm drain inlets properly protected?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
6	Is the construction exit preventing sediment from being tracked into the street?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	

BMP 8 – Construction Site Inspection and Enforcement

	BMP/activity	Implemented?	Maintenance Required?	Corrective Action Needed and Notes
7	Is trash/litter from work areas collected and placed in covered dumpsters?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
8	Are washout facilities (e.g., paint, stucco, concrete) available, clearly marked, and maintained?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
9	Are vehicle and equipment fueling, cleaning, and maintenance areas free of spills, leaks, or any other deleterious material?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
10	Are materials that are potential stormwater contaminants stored inside or under cover?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
11	Are non-stormwater discharges (e.g., wash water, dewatering) properly controlled?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
12	(Other)	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	

BMP 8 – Construction Site Inspection and Enforcement**Non-Compliance**

Describe any incidents of non-compliance not described above:

CERTIFICATION STATEMENT

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

Print name and title: _____

Signature: _____ **Date:** _____

BMP 8 – Construction Site Inspection and Enforcement

Annual Report Documentation

A summary of the information above covering January 1 to December 31 of the prior year will need to be provided to John Crear by January 31 of each year for inclusion into the City's MS4 annual report to the TCEQ. The annual report documentation should include the following:

- # of constructions sites within MS4 boundary
- # of priority construction sites within MS4 boundary
- # of construction site inspections conducted
- # of priority construction site inspections conducted
- # of construction site violations
- # of construction site enforcement actions
- # of construction site follow-up inspections
- Date of corrective action notification
- Date of follow-up inspections

BMP 9 – Construction Site Inventory

Responsible Department(s)

Construction Inspectors; Stormwater Quality Coordinator; Engineering Department

Measurable Goal and Objectives

Years 1 – 5 Measurable Goals
<p>A. Maintain one inventory of all known permitted active public and private construction sites that result in a total land disturbance of one or more acres or a total land disturbance of less than an acre if part of a larger common plan or development or sale.</p> <ul style="list-style-type: none"> i. Add active construction sites to inventory within 5 business days of pre-construction meeting or NOI. ii. Remove finalized construction sites from inventory within 10 business days of receipt of NOT. iii. Maintain one copy of each NOI for construction activity submitted by the contractor to the City.
Compliance Requirements: Part III, Section B.3(c) Construction Site Inventory

Documentation Guidance

This BMP commits the City to identify and maintain an inventory of all known permitted active public and private construction sites that disturb one or more acres of land or less than one acre if part of a larger common plan. This construction inventory is used to assist City inspectors in locating current construction sites and identifying newly permitted construction sites.

The City should determine when in the permit application process the inventory should be updated to add or remove construction sites. Examples include:

Add to Inventory:

- After pre-construction meeting
- After issuance of grading permit log
- After receipt of Notice of Intent/
Construction Site Notification

Remove from Inventory:

- After receipt of Notice of Termination
- After final site walk through
- After City final acceptance of site
- After issuance of Certificate of Occupancy

Compliance Documentation

The following information may be recorded for compliance documentation and for reference during annual reporting:

- List of permitted active public and private construction sites
- List of pre-construction meetings
- List of grading permits issued
- List of notice of intents received
- List of notice of terminations received
- Date of notice of intent receipt
- Date of construction site additions to inventory
- Date of construction site removal from inventory
- Date of pre-construction meeting or issuing of grading permit
- Date of notice of terminations received

BMP 9 – Construction Site Inventory

The sample table below shows the basic content to document and may be used for record keeping, or the information may be stored in a spreadsheet, an electronic database, the City's permit tracking system or another documentation system. This information is not limited to the data listed in the sample table below. Additional items can be added for tracking purposes.

Site Name	Operator	Location	Type	NOI Date	Site Notice Date	NOT Date
Site A	Contractor B	Address	Public/Private	02/15/2019	NA	09/20/2019

Annual Report Documentation

A summary of the information above covering January 1 to December 31 of the prior year will need to be provided to John Crear by January 31 of each year for inclusion into the City's MS4 annual report to the TCEQ. The annual report documentation should include the following:

- # of permitted active public and private construction sites
- Date of pre-construction meeting or issuing of grading permit
- Date of construction site additions to inventory (within 5 business days of pre-con meeting or grading permit)
- # of notice of terminations received
- Date of notice of terminations received
- Date of construction site removal from inventory (within 10 business days of receipt of NOT)
- # of Notice of Intents received for construction activity

BMP 10 – Structural Control Maintenance, Inspection, and Enforcement

Responsible Department(s)

Engineering Department

Measurable Goal and Objectives

Year 1 Measurable Goals	
<ul style="list-style-type: none"> A. Develop one TCEQ approved approach to evaluate the City’s current program for inspection and maintenance of City-owned structural controls and enforcement of maintenance requirements for privately-owned post-construction BMPs. <ul style="list-style-type: none"> i. Document the approach in one memo to file by December. B. Continue and/or implement requirements for deed-recorded maintenance plans for privately-owned structural controls. <ul style="list-style-type: none"> i. Record 100% of maintenance agreements for new privately-owned post-construction BMPs prior to final acceptance. ii. Document enforcement action for post-construction requirements at privately-owned post-construction BMPs by December of each year. 	
Year 2 Measurable Goals	
<ul style="list-style-type: none"> A. Evaluate the City’s current program for structural control inspection and maintenance and enforcement of maintenance requirements for privately-owned post-construction BMPs. <ul style="list-style-type: none"> i. Document results of evaluation and identify “priority” structural controls (e.g. sensitivity of receiving waters, history of illegal dumping, and recurring issues) in one memo to file by December. B. Continue and/or implement requirements for deed-recorded maintenance plans for privately-owned structural controls. <ul style="list-style-type: none"> i. Record 100% of maintenance agreements for new privately-owned post-construction BMPs prior to final acceptance. ii. Document enforcement action for post-construction requirements at privately-owned post-construction BMPs by December of each year. 	
Years 3 – 5 Measurable Goals	
<ul style="list-style-type: none"> A. Continue inspections of City-owned priority water quality structural controls according to written procedures. <ul style="list-style-type: none"> i. Inspect 100% of City-owned priority water quality structural controls by the end of the permit term. B. Continue and/or implement requirements for deed-recorded maintenance plans for privately-owned structural controls. <ul style="list-style-type: none"> i. Record 100% of maintenance agreements for new privately-owned post-construction BMPs prior to final acceptance. ii. Document enforcement action for post-construction requirements at privately-owned post-construction BMPs by December of each year. 	
Compliance Requirements: Part III, Section B.4(b)(2) Enforcement, (b)(3) Long-Term Maintenance of Post-Construction Stormwater Control Measures, and (c)(1) Inspections	

BMP 10 – Structural Control Maintenance, Inspection, and Enforcement

Documentation Guidance

This BMP commits the City to:

1. Inspection and maintenance of priority City-owned structural controls.
2. Enforcement of deed-recorded maintenance requirements for privately-owned post-construction BMPs and structural controls.

Reference Material

The City must require maintenance agreements for any privately-owned post-construction BMPs. Examples can be found through the following references:

- NCTCOG BMP Library:
<https://www.nctcog.org/envir/watershed-management/stormwater/bmp-library>
- EPA Stormwater Discharges to Municipal Sources:
<https://www.epa.gov/npdes/stormwater-discharges-municipal-sources>

Compliance Documentation

The following information should be recorded for compliance documentation and for reference during annual reporting:

Year 1

- Approved SWMP
 - Memo to file documenting date of TCEQ approval of SWMP
- MS4 map with inventory of City-owned structural controls
 - # of City-owned structural controls
 - # of privately-owned structural controls
- Enforcement of maintenance agreements for new privately-owned structural controls
 - # of maintenance agreements
 - Record of enforcement action

Year 2

- One memo documenting evaluation of the City's current inspection program for City-owned structural controls and enforcement of maintenance agreements for privately-owned structural controls
- MS4 map with inventory of City-owned structural controls
 - # of City-owned structural controls
 - # of privately-owned structural controls
- Identification of priority structural controls (e.g. sensitivity of receiving waters, history of illegal dumping, and/or recurring issues)
 - # of privately-owned structural controls
- Enforcement of maintenance agreements for new privately-owned structural controls
 - # of new maintenance agreements
 - Record of enforcement action

BMP 10 – Structural Control Maintenance, Inspection, and Enforcement

Years 3 - 5

- Document inspection and maintenance for each City-owned priority water quality structural control
 - Written procedures for maintenance of City-owned structural controls
 - Schedule/log of maintenance activities/work orders
 - Inspection and maintenance forms
- MS4 map with inventory of structural controls
 - # of priority structural controls
 - # of City-owned priority water quality structural control inspections
 - # of City-owned structural controls
- Enforcement of maintenance agreements for new privately-owned structural controls
 - # of new maintenance agreements
 - Record of enforcement action

Annual Report Documentation

A summary of the information above covering January 1 to December 31 of the prior year will need to be provided to John Crear by January 31 of each year for inclusion into the City's MS4 annual report to the TCEQ. The annual report documentation should include the following:

Year 1

- Date of memo to file and SWMP approval
- # of City-owned structural controls
- # of privately-owned structural controls
- # of privately-owned structural control maintenance agreements
- # of privately-owned structural control enforcement actions taken

Year 2

- Date of memo documenting evaluation of the City's current inspection program for City-owned structural controls and enforcement of maintenance agreements for privately-owned structural controls
- # of City-owned structural controls
- # of privately-owned structural controls
- # of privately-owned priority structural controls
- # of privately-owned structural control maintenance agreements
- # of privately-owned structural control enforcement actions taken

Years 3 - 5

- # of City-owned priority water quality structural controls
- # of inspections at City-owned priority water quality structural controls
- # of maintenance activities/work orders for City-owned priority water quality structural controls
- # of privately-owned structural controls
- # of privately-owned priority structural controls
- # of privately-owned structural control maintenance agreements
- # of privately-owned structural control enforcement actions taken

BMP 11 – Maintenance Contractor Oversight

Responsible Departments

Construction Inspectors

Measurable Goal and Objectives

Years 1 – 5 Measurable Goals
<p>A. Utilize standard contract language requiring compliance with City stormwater pollution prevention measures, good housekeeping practices, and facility specific stormwater management operating procedures on 100% of new or renewed service agreements with contractors hired to perform City maintenance activities with the potential to impact stormwater quality.</p> <p>B. Investigate stormwater quality reports concerning contracted maintenance activities within 2 business days of receipt of report.</p> <p style="padding-left: 40px;">i. Maintain one copy of inspection documentation notes and follow-up actions, as necessary</p>
Compliance Requirements: Part III, Section B.5(b)(4) Contractor Requirements and Oversight

Documentation Guidance

This BMP commits the City to require the contractors performing maintenance activities on behalf of the City to comply with applicable stormwater ordinances, stormwater control measures, good housekeeping practices, and facility-specific standard operating procedures for stormwater pollution prevention. The City is required to investigate stormwater quality reports concerning contracted maintenance activities.

Examples of contracted maintenance include, but are not limited to, the following:

- Winter road maintenance
- Minor road repairs
- Infrastructure work
- Automobile fleet maintenance
- Landscaping and park maintenance
- Building maintenance
- Street sweeping
- Water, sewer, and storm sewer maintenance
- Waste disposal and handling

Reference Material

To comply with the commitments of this part of the MS4 permit, the City must be mindful of pollutant concerns associated with each contracted maintenance activity. A list of these activities and their pollutant concerns can be found on EPA's website at <https://www.epa.gov/sites/production/files/2015-11/documents/potmunpoll.pdf>.

Compliance Documentation

The following information should be recorded for compliance documentation and for reference during annual reporting:

- Document standard contract language requiring contractor compliance with City stormwater BMPs and regulations
- Document each executed contract between the City and the maintenance contractor
 - # of authorized contracts
- Record all reported or observed stormwater quality reports concerning contractors
 - # of water quality reports in regard to City maintenance contractors, if any
 - # of investigations/inspections
 - # or follow up inspections

BMP 11 – Maintenance Contractor Oversight

The sample table below shows the basic content to document and may be used for record keeping, or the information may be stored in a spreadsheet, an electronic database, the City's permit tracking system or another documentation system.

Contractor	Work Order #	Type of Work	Pollutant of Concern	Violation	Inspection	Repeat Violation

Example Contractor Agreement

The following text is an example of contract language requiring contractor compliance with stormwater protection standard operating procedures:

Contractor BMP Adherence Agreement

I hereby certify that I have received and read the MS4 Standard Operating Procedures (SOPs) provided by the City of _____ and understand all requirements relating to the City's Best Management Practices (BMPs) as outlined in the Stormwater Master Plan (SWMP). I agree to conduct my work in a manner that complies with all pollution prevention and good housekeeping BMPs as appropriate. The City of _____ reserves the right to request proof of adherence to the aforementioned BMPs and to take appropriate actions of enforcement until sufficient proof is furnished.

Project Title: (City lists project title)

BMPs/SOPs Provided: (City lists BMPs/SOPs)

(Contractor Signature)

(Date)

(Printed Name)

(City Staff initials)

(Date Received)

Annual Report Documentation

A summary of the information above covering January 1 to December 31 of the prior year will need to be provided to John Crear by January 31 of each year for inclusion into the City's MS4 annual report to the TCEQ. The annual report documentation should include the following:

- # of authorized contractor agreements
- # of water quality reports in regard to City maintenance contractors, if any
- Date of water quality report receipt
- # of investigations/inspections
- Date of investigations/inspections (\leq 2 business days from receipt of report)
- # or follow up inspections
- Date of follow up inspections

BMP 12 – Municipal Operations and Maintenance Activity

Responsible Department(s)

Street Department; Stormwater Quality Coordinator

Measurable Goal and Objectives

Year 1 Measurable Goals
<p>A. Develop one TCEQ approved approach to evaluate the City's current operations and maintenance activities for their potential to discharge pollutants in stormwater.</p> <p style="padding-left: 40px;">i. Document the approach in a memo to file by December.</p>
Year 2 Measurable Goals
<p>A. Evaluate each operation and maintenance activity performed by the City and identify pollutants of concern associated with these activities.</p> <p style="padding-left: 40px;">i. Document results of evaluation and identify operations and maintenance activities performed by the City in one memo to file by December.</p>
Years 3 – 5 Measurable Goals
<p>A. Continue to perform existing operations and maintenance activities according to established procedures to reduce the discharge of pollutants from the activities.</p> <p>B. Implement a set of pollution prevention measures for any newly identified operations and maintenance activities with potential to impact stormwater quality performed by the City within 12 months of identification of the activity.</p>
<p>Compliance Requirements: Part III, Section B.5(b)(5) Municipal Operation and Maintenance Activities and (b)(6) Structural Control Maintenance</p>

Documentation Guidance

This BMP requires the City to:

1. Identify operations and maintenance activities with the potential to discharge pollutants of concern
2. Implement a set of stormwater pollution prevention measures (standard operating procedures)
3. Visually inspect pollution prevention measures to ensure proper functionality
4. Reduce the collection of pollutants in catch basins and other surface drainage structures to the maximum extent possible
5. Identify and inspect problem areas (recurrent illegal dumping) and prioritize accordingly

Reference Material

Some example operation and maintenance activities include:

- Road and parking lot maintenance—pothole repair, pavement marking, sealing, and re-paving
- Bridge maintenance—re-chipping, grinding, and saw cutting
- Cold weather operations—plowing, sanding, application of deicing and anti-icing compounds
- Right-of-way maintenance—mowing, herbicide and pesticide application, and planting vegetation
- Storm sewer system maintenance

BMP 12 – Municipal Operations and Maintenance Activity

To comply with the commitments of this part of the MS4 permit, the City must identify pollutants of concern that could be discharged from the above operation and maintenance activities. A majority of these activities and their pollutants of concern can be found on EPA's website at <https://www.epa.gov/sites/production/files/2015-11/documents/potmunpoll.pdf>.

Compliance Documentation

The following information should be recorded for compliance documentation and for reference during annual reporting:

Year 1

- TCEQ approved SWMP documenting compliance approach
 - Memo to file documenting date of TCEQ approval
- Log of existing operations and maintenance activities (e.g. work orders)
- Standard Operating Procedures for operations and maintenance activities

Year 2

- Identified operations and maintenance activities and their pollution prevention measures
 - Memo to file documenting evaluation of current operations and maintenance activities and identified pollutants of concern
- Log of existing operations and maintenance activities (e.g. work orders, inspections)
- Standard Operating Procedures for operations and maintenance activities

Years 3-5

- Log of existing operations and maintenance activities (e.g. work orders, inspections)
- List of potential problem areas
- Standard Operating Procedures for operations and maintenance activities

Annual Report Documentation

A summary of the information above covering January 1 to December 31 of the prior year will need to be provided to John Crear by January 31 of each year for inclusion into the City's MS4 annual report to the TCEQ. The annual report documentation should include the following:

Year 1

- Date of SWMP approval and memo to file
- # of maintenance activities conducted

Year 2

- # of operations and maintenance activities conducted
- # of pollutants of concern associated with operation and maintenance activities conducted
- Date of memo to file with operations and maintenance activities and pollutant of concerns listed
- # of maintenance activities conducted

Year 3-5

- # of newly identified operations and maintenance activities, if any
- # of pollutants of concern associated with operation and maintenance activities added
- Date of pollution prevention measure implementation associated with new activities, if any
 - Should be implemented within 12 months of identification of activity
- # of maintenance activities conducted
- # of inspections conducted

BMP 13 – Municipal Operations Inspection Program and Procedures***Responsible Department(s)***

Street Department; Stormwater Quality Coordinator

Measurable Goal and Objectives

Year 1 Measurable Goals
<ul style="list-style-type: none">A. Develop one TCEQ approved approach to evaluate the City’s current procedures for visual inspections of pollution prevention measures at City-owned facilities by December.<ul style="list-style-type: none">i. Document the implementation approach in one memo to file.
Year 2 Measurable Goals
<ul style="list-style-type: none">A. Evaluate the City’s current procedures for visual inspections of pollution prevention measures at City-owned facilities by December.<ul style="list-style-type: none">i. Document in one memo to file additional staff or program needs to meet permit requirements or City goals.
Year 3 Measurable Goals
<ul style="list-style-type: none">A. Develop written procedures for visual inspection of pollution prevention measures at City-owned facilities by December.<ul style="list-style-type: none">i. Create one standard inspection checklist.ii. Create one list of pollution prevention measures to be inspected.
Years 4 – 5 Measurable Goals
<ul style="list-style-type: none">A. Begin visual inspection of pollution prevention measures at City-owned facilities according to written procedures.<ul style="list-style-type: none">i. Inspect 100% of pollution prevention measures by the end of the permit term.ii. Maintain one completed inspection checklist for each facility.
Compliance Requirements: Part III, Section B.5(b)(5)d Inspection of Pollution Prevention Measures

BMP 13 – Municipal Operations Inspection Program and Procedures

Documentation Guidance

This BMP commits the City to:

- Develop written procedures for inspection of pollution prevention measures at City-owned facilities
- Conduct facility assessments to determine ***high priority facilities***
 - ***High Priority Facilities*** – permittee-owned maintenance yard, hazardous waste facilities, fuel storage locations, and other facilities at which chemicals or other materials have a high potential to be discharged in stormwater.
- Implement stormwater controls for ***high priority facilities***
 - General good housekeeping – shelter potential pollutants from stormwater exposure
 - De-icing and anti-icing material storage – ensure that stormwater runoff from storage piles of salt and other de-icing and anti-icing materials is not discharged or provide permit in which these discharges are authorized
 - Fueling operations and vehicle maintenance – Develop SOPs that address spill prevention and spill control at permittee-owned and operated vehicle fueling, vehicle maintenance, and bulk fuel delivery facilities
 - Equipment and vehicle washing – Develop SOP that addresses equipment and vehicle washing activities
- Implement and conduct an inspection program for ***high priority facilities***

Reference Material

Several sources of readily available information on pollution prevention measures can be found on the US EPA National Menu of Best Management Practices for Stormwater webpage at <https://www.epa.gov/npdes/national-menu-best-management-practices-bmps-stormwater#poll>.

Compliance Documentation

The following information should be recorded for compliance documentation and for reference during annual reporting:

Year	Documentation	Measures of Program	Deadline
Year 1	<ul style="list-style-type: none"> Copy of SWMP documenting compliance approach; note date of SWMP approval in memo to file 	<ul style="list-style-type: none"> Date of SWMP approval 	December 2019
Year 2	<ul style="list-style-type: none"> One memo to file of documenting current inspection procedures and necessary program updates MS4 map of City-owned facilities 	<ul style="list-style-type: none"> Date of memo finalization List of pollution prevention measures at City-owned facilities 	December 2020
Year 3	<ul style="list-style-type: none"> One set of written procedures to inventory pollution prevention measures and City-owned facilities inspections One standard inspection checklist One list of City-owned pollution prevention measures to be inspected One list of <i>high priority facilities</i> 	<ul style="list-style-type: none"> Date of written procedure finalization Date of standard inspection checklist finalization # of <i>high priority facilities</i> 	December 2021

BMP 13 – Municipal Operations Inspection Program and Procedures

Year	Documentation	Measures of Program	Deadline
Years 4 & 5	<ul style="list-style-type: none"> Field documentation of visual inspections at City-owned facilities Photographs for visual inspection Written procedures for inspection of pollution prevention measures 	<ul style="list-style-type: none"> # of inspections Date of inspections # of corrective actions, if any Date of corrective action 	December 2022 & 2023

Annual Report Documentation

A summary of the information above covering January 1 to December 31 of the prior year will need to be provided to John Crear by January 31 of each year for inclusion into the City's MS4 annual report to the TCEQ. The annual report documentation should include the following:

Year 1

- Date of SWMP approval and memo finalization

Year 2

- Date of memo finalization

Year 3

- Date of written procedure finalization
- Date of standard checklist finalization
- # of pollution prevention measures to be inspected
- # of ***high priority facilities***

Years 4 & 5

- # of inspections
- Date of inspections
- # of corrective actions, if any
- Date of corrective action, if any

BMP 14 – Disposal of Collected Waste

Responsible Department(s)

Street Department

Measurable Goal and Objectives

Years 1 – 5 Measurable Goals
<p>A. Dispose of waste material according to written procedure and in accordance with Title 30 of Texas Administrative Code Chapters 330 or 335, as applicable.</p> <p style="padding-left: 40px;">i. Maintain one copy of associated waste disposal documentation (e.g. waste manifests, contractor invoices, ect.) and estimate the amount of waste material disposed of by December of each year.</p>
Compliance Requirements: Part III, Section B.5(b)(3) Disposal of Waste Material

Documentation Guidance

This BMP commits the City to properly dispose of waste material from all City activities. Several activities are conducted by municipalities that require waste disposal, including but not limited to the following:

- Street sweeping
- Inlet cleaning
- MS4 maintenance
- City-owned facilities
- City-operated construction sites
- City-contracted construction sites for City land
- Volunteer clean-up programs
- Community clean-up events

The City must develop Standard Operating procedures for disposal of collected waste. The Standard Operating Procedure should be provided to City staff and maintenance contractors with waste disposal responsibilities.

Reference Material

Waste disposal must be performed in accordance with Title 30 Texas Administrative Code, Chapter 330 and 335, found here: [https://texreg.sos.state.tx.us/public/readtac\\$ext.ViewTAC?tac_view=3&ti=30&pt=1](https://texreg.sos.state.tx.us/public/readtac$ext.ViewTAC?tac_view=3&ti=30&pt=1)

Compliance Documentation

In addition, the following information should be recorded for compliance documentation and for reference during annual reporting:

- Project name requiring waste disposal
- Waste manifests
- Waste disposal invoices
- Amount of waste disposal
- Type of waste disposal

BMP 14 – Disposal of Collected Waste

The sample table below shows the basic content to document and may be used for record keeping, or the information may be stored in a spreadsheet, an electronic database, the City's permit tracking system or another documentation system.

Disposal Date	Activity Generating Waste	Waste Collection Location	Waste Collection Amount	Disposal Location
01/20/19	Street Sweeping	First Street	100 lbs.	City Landfill
02/18/19	Inlet Cleanout	Fourth Street	2 cubic yards	City Landfill

Annual Report Documentation

A summary of the information above covering January 1 to December 31 of the prior year will need to be provided to John Crear by January 31 of each year for inclusion into the City's MS4 annual report to the TCEQ. The annual report documentation should include the following:

- Amount of waste collected
- Type of waste collected
- # of waste manifests

BMP 15 – Street Sweeping (Roadway Pollution Prevention)

Responsible Department(s)

Street Department

Measurable Goal and Objectives

Years 1 – 5 Measurable Goals
A. Conduct street sweeping activities for City-owned roadways and parking lots according to established procedures. <ul style="list-style-type: none">i. Maintain one schedule/log of sweeper activity; record 100% of entries by December of each year
Compliance Requirements: Part III, Section B.5(c)(2) Operation and Maintenance Program to Reduce Discharges of Pollutants from Roads

Documentation Guidance

This BMP commits the City to street sweeping activities for City-owned roadways and parking lots.

Program Criteria

The street sweeping program should meet the following criteria:

- Sweeping activities should be conducted on streets, road segments, and public parking lots.
- The street sweeping program must be conducted in accordance with the frequency and schedule determined in the City's O&M program.
- Street sweeping activities should follow Standard Operating Procedures developed as part of the Municipal Operations and Maintenance Activity BMP (BMP 12)
- Street sweeping contractors should follow City Standard Operating Procedures (BMP 11)
- Street sweeping activities should follow collected waste disposal protocols (BMP 14)

Compliance Documentation

The following information should be recorded for compliance documentation and for reference during annual reporting:

- Schedule/log of street sweeping activities
- Log of disposal locations
- Maintenance contracts, if applicable
- # of curb miles of streets swept
- Amount of debris and waste collected
- Frequency of street sweeping

BMP 15 – Street Sweeping (Roadway Pollution Prevention)

Annual Report Documentation

A summary of the information above covering January 1 to December 31 of the prior year will need to be provided to John Crear by January 31 of each year for inclusion into the City's MS4 annual report to the TCEQ. The annual report documentation should include the following:

- # of curb miles of streets swept
- Amount of debris and waste collected
- Frequency of street sweeping

BMP 16 – Staff Training

Responsible Department(s)

Stormwater Quality Coordinator; Engineering Department; Code Enforcement; Building Inspections; Street Department; Construction Inspectors; Water/Wastewater Department

Measurable Goal and Objectives

Years 1 – 5 Measurable Goals

- A. Conduct training for staff with responsibilities relating to activities with potential impacts to stormwater quality.
- Provide general awareness-level training for pollution prevention and good housekeeping to staff at least once annually.
 - Provide job-specific stormwater quality and pollution prevention training to 100% of staff responsible for performing those activities in advance of conducting unsupervised responsibilities.
 - Provide job-specific stormwater quality and pollution prevention training to 100% of staff responsible for performing those activities within 12 months of date of hire or transfer to new role.
 - Maintain one copy of training documentation onsite or in SWMP by December of each year.

Compliance Requirements: Part III, Section B.2(c)(2) Education and Training, Section B.3(b)(7) MS4 Staff Training, and Section B.5(b)(2) Training and Education

Documentation Guidance

This BMP commits the City to implement a method for training and informing all field staff that may come into contact with or observe illicit discharges or connections, construction stormwater program permitting, plan review, construction site inspections, and enforcement, and pollution prevention and good housekeeping practices as a part of normal job responsibilities.

The following information about the program should be documented in a memo to file:

- Goals and objectives of program; training standards
- Identification of appropriate personnel to be trained
- Training material used

Reference Material

Several sources of readily available training materials exist, including:

- NCTCOG Illicit Discharge Training: <https://www.nctcog.org/envir/watershed-management/stormwater/illicit-discharge>
- NCTCOG Construction Stormwater Awareness Training: <https://www.nctcog.org/envir/watershed-management/stormwater/construction/construction-stormwater-awareness-dvd>
- NCTCOG Pollution Prevention Training: <https://www.nctcog.org/envir/watershed-management/stormwater/pollution-prevention/pollution-prevention-dvd>
- Partners for a Clean Environment (PACE) Training: <https://www.pacepartners.com/program-areas/water/municipal-stormwater-operations/#1528829690034-cdef0c08-5007>

BMP 16 – Staff Training

Compliance Documentation

The following information should be recorded for compliance documentation and for reference during annual reporting:

- Personnel required to be trained
- Departments involved
- Training schedule
- Training attendance lists
 - Dates of trainings held
 - # of trainings held
 - # of staff trained
- Training material and source (City training or external)
- Training certificates, if available

The sample table below shows the basic content to document and may be used for record keeping, or the information may be stored in a spreadsheet, an electronic database, the City's permit tracking system or another documentation system.

Date	Training Subject	Department	Print Name	Signature
03/11/19	Illicit Discharge Tracking	Stormwater		
04/25/19	Construction Stormwater Inspections	Stormwater, Public Works		

Annual Report Documentation

A summary of the information above covering January 1 to December 31 of the prior year will need to be provided to John Crear by January 31 of each year for inclusion into the City's MS4 annual report to the TCEQ. The annual report documentation should include the following:

- # of personnel required to attend awareness-level training
- # of awareness-level training for pollution prevention and good housekeeping courses (\geq once annually)
- # of new staff with stormwater related job duties
- # of new staff trained in stormwater related job duties
- Date of all trainings

BMP 17 – Stormwater Quality Ordinances

Responsible Department(s)

Engineering Department; Construction Inspectors

Measurable Goal and Objectives

Year 1 Measurable Goals
<p>A. Develop one TCEQ approved approach to evaluate the City's current ordinances for compliance with illicit discharge prohibition, construction site stormwater runoff control, and post-construction permit requirements by December.</p> <p style="padding-left: 40px;">i. Document the evaluation approach in one memo to file.</p>
Year 2 Measurable Goals
<p>A. Evaluate the City's current ordinances for compliance with illicit discharge prohibition, construction site stormwater runoff control, and post-construction permit requirements by December.</p> <p style="padding-left: 40px;">i. Document the results of the evaluation in one memo to file.</p>
Year 3 Measurable Goals
<p>A. Update or adopt municipal ordinances as deemed necessary through the ordinance evaluation to comply with illicit discharge prohibition, construction site stormwater runoff control, and post-construction permit requirements by December.</p>
Years 4 – 5 Measurable Goals
<p>A. Document any changes to existing City ordinances to comply with illicit discharge prohibition, construction site stormwater runoff control, and post-construction permit requirements in one memo to file by December.</p>
<p>Compliance Requirements: Part III, Section B.2(a)(1) Program Development, Part III, Section B.3(a)(1) Requirements and Control Measures, and Part III, Section B.4(a)(2) Post-Construction Stormwater Management Program</p>

Documentation Guidance

This BMP commits the City to adopt, maintain, and enforce ordinances relating to illicit discharge prohibition, construction site stormwater runoff control, and post-construction stormwater management in new development and redevelopment.

The following information about the program should be documented in a memo to file:

- Evaluation results of City current ordinances
- Adopted municipal ordinances, as necessary
- Changes made to existing City ordinances

BMP 17 – Stormwater Quality Ordinances

Reference Material

Several sources of readily available ordinance materials exist, including:

- NCTCOG Model Stormwater Ordinance Provisions for Small MS4s to Control Illicit Discharges: <https://www.nctcog.org/nctcg/media/Environment-and-Development/Documents/Stormwater/illicits-model-ord-battledoc.pdf>
- NCTCOG Post-Construction Ordinance Template: https://resources.nctcog.org/envir/committees/rswmcc/council/Post_Construction_Ordinance_Draft_Feb_2018.pdf
- EPA Erosion and Sediment Control Model Ordinance: https://www.epa.gov/sites/production/files/2015-12/documents/e-s_model_ordinance1.pdf

Compliance Documentation

The following information should be recorded for compliance documentation and for reference during annual reporting:

- Date of TCEQ approval of SWMP and memo finalization
- Evaluation of current ordinances
- Date of review of ordinances
- Date of adoption of or update to ordinances, if any
- Memo documenting type of ordinance adopted or updated
- Date of memo documenting type of ordinance adopted or updated finalization

Annual Report Documentation

A summary of the information above covering January 1 to December 31 of the prior year will need to be provided to John Crear by January 31 of each year for inclusion into the City's MS4 annual report to the TCEQ. The annual report documentation should include the following:

- Date of TCEQ approval of SWMP and memo finalization
- Date of ordinance evaluation
- # of ordinance updates or adoptions
- Date of memo documenting type of ordinance adopted or updated finalization



FREESE AND NICHOLS

LEADS

- ▶ (L) LEARN CONTINUOUSLY
- ▶ (E) ENGAGE AS FAMILY
- ▶ (A) ACT WITH INTEGRITY
- ▶ (D) DELIVER QUALITY
- ▶ (S) SERVE ALWAYS



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