Phase II MS4 General Permit Annual Report - Preparation

Texas Commission on Environmental Quality
(TCEQ)
Stormwater Team
Water Quality Division
(512) 239-4671

Legal Basis for Phase II MS4 General Permit and Annual Report Requirements

- CWA §§ 301, 304, and 401 and § 402
- Code of Federal Regulations (CFR) 40 CFR Part 122
- Texas Water Code (TWC) Chapter 26 Section (§) 26.121, § 26.027, § 26.040,
- 30 Texas Administrative Code (TAC) Chapters 39, 205, 213, 281, 311, 305, 307, 309, 319, 321, and 331

Phase II MS4 Annual Report

MS4s are required to reduce the discharge of pollutants from to the maximum extent practicable (MEP) & meet water quality requirements of the CWA & 30 TAC Chapter 307

Confirms the progress to achieving the statutory goal of complying with the CWA, TWC and 30 TAC Chapter 307 to reduce the discharge of pollutants

Phase II MS4 Annual Report

- MS4s authorized under previous version of the permit must prepare an annual report whether or not the NOI and SWMP have been approved by the TCEQ.
- If the permittee has not implemented the SWMP because it has not received approval of the NOI and SWMP the annual report may include that information.

Phase II MS4 Annual Report

- The annual report must be submitted using the latest version of the TCEQ approved form (TCEQ-20561)
- The annual report must describe activities conducted during the reporting period starting and ending dates
- An annual report must be submitted even if the SWMP has not yet been approved by the TCEQ

Shared Programs

- System-wide annual report for shared SWMPs
- Include all MS4s that share the SWMP
- The annual report must include the responsibilities specific to each member MS4
- Signature Requirements each MS4 operator must certify and sign the report per 30 TAC § 305.128

Phase II MS4 Annual Report

- Due within **90 days** of the end of each reporting option selected by the MS4
- Reporting year Options:
  - Permit Option year ends January 23
  - Calendar year Option ends December 31
  - Fiscal year Option ends on the last day of the Fiscal Year
- Reporting year **can not change** during the permit term

Permit Year Option

Date	Action
Jan. 24, 2019	Permit Effective Date
July 23, 2019 (180 Days)	NOI + SWMP Due
Jan. 24, 2019	Beginning of Permit Year (including six weeks the GP was delayed)
Jan. 23, 2020	End of Permit Year
April 22, 2020	Year 1 Annual Report Due (90 days from effective date of permit)

Permit Year Option Annual Reporting Dates

Reporting Year	Report Beginning and Ending Dates
Year 1	12/13/2018 to 01/23/2020
Year 2	01/24/2020 to 01/23/2021
Year 3	01/24/2021 to 01/23/2022
Year 4	01/24/2022 to 01/23/2023
Year 5	01/24/2023 to 01/23/2024

Calendar Year Option

Date	Action
Jan. 24, 2019	Permit Effective Date
July 23, 2019 (180 Days)	NOI + SWMP Due
Jan. 1, 2019	Beginning of Calendar Year 1
Dec. 31, 2019	End of Calendar Year 1
March 30, 2020	Year 1 Annual Report Due (90 Days from Calendar Year)

Calendar Year Option Reporting Dates

Reporting Year	Report Beginning and Ending Dates
Year 1	01/01/2019 to12/31/2019
Year 2	01/01/2020 to 12/31/2020
Year 3	01/01/2021 to 12/31/2021
Year 4	01/01/2022 to 12/31/2022
Year 5	01/01/2023 to 12/31/2023

Fiscal Year Option (Example)

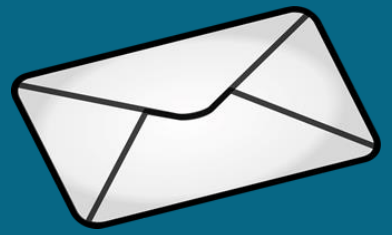
Date	Action
Jan. 24, 2019	Permit Effective Date
July 23, 2019 (180 Days)	NOI + SWMP Due
Oct. 1, 2018	Start of MS4 Fiscal Year
Sept. 30, 2019	End of MS4 Fiscal Year
Dec. 30, 2019	Year 1 Annual Report Due (90 days from last day of Fiscal Year)

Fiscal Year Option Reporting Beginning and Ending Dates Example Based on FY ending 09/30

Reporting Year	Beginning and Ending Dates
Combined Year 5 /Year 1	10/1/2018 to 09/30/2019
Year 2	10/1/2019 to 09/30/2020
Year 3	10/1/2020 to 09/30/2021
Year 4	10/1/2021 to 09/30/2022
Year 5	10/1/2022 to 09/30/2023

Phase II MS4 Annual Report Submission

- The **original** Report must be submitted to:



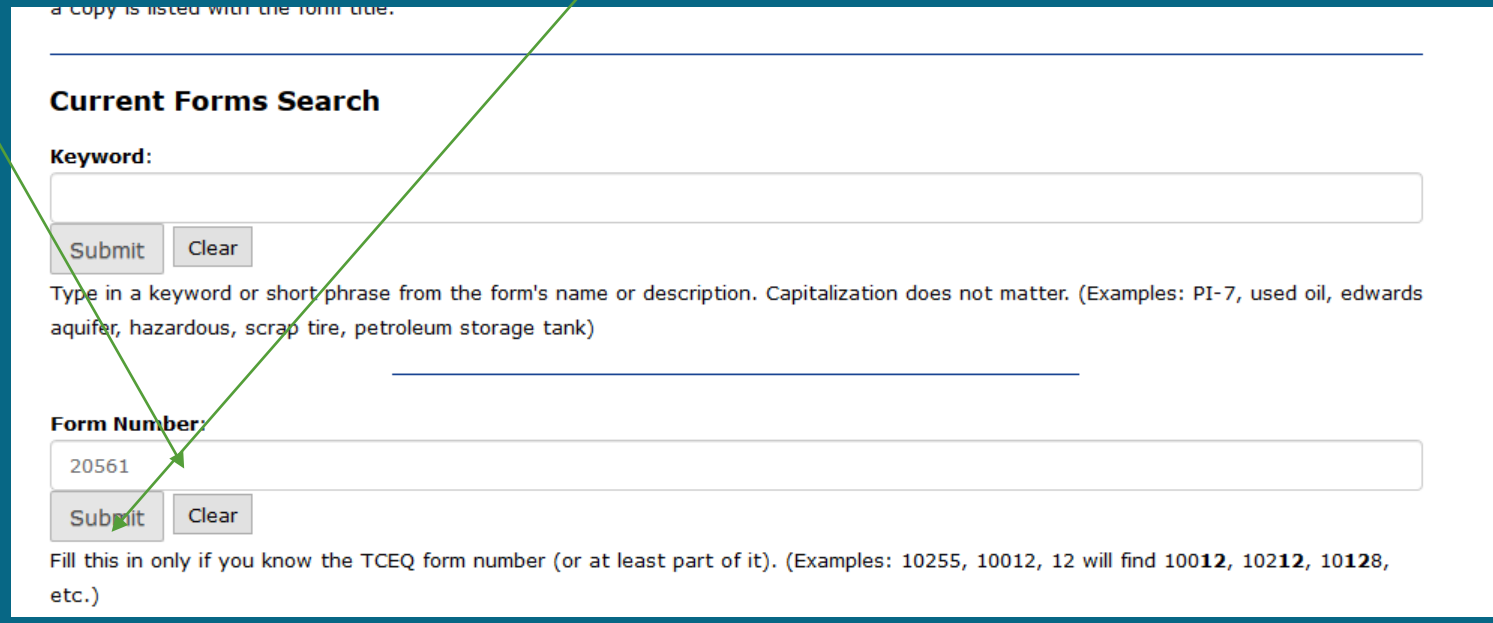
Texas Commission on Environmental Quality

Rebecca L. Villalba, Team Leader
Stormwater Team (MC-148)
P.O. Box 13087
Austin, Texas 78711-3087

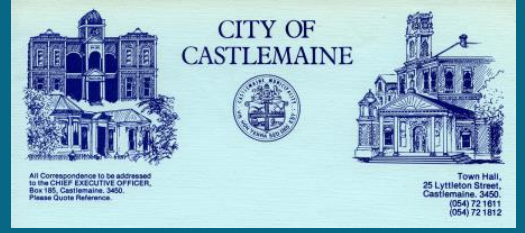
- A copy submitted to the appropriate TCEQ **Regional Office**
- A copy of Report retained **on site**

Annual Report Template & Instructions

- Always use the **most recent** template available on TCEQ's website https://www.tceq.texas.gov/publications/search_forms.html **TCEQ-20561 (Rev January 2019) and click on submit**



March 30, 2020



Texas Commission on Environmental Quality
Stormwater Team Leader (MC-148)
P.O. Box 13087
Austin, Texas 78711-3087

Re: Phase II MS4 Annual Report Transmittal for the City of Castlemaine
TPDES Authorization: **TXR040012** *(unique 3-digit authorization number}*

Dear Team Leader:

This letter serves to transmit the required annual report for the Texas Pollutant Discharge Elimination System Small Municipal Separate Storm Sewer System General Permit, Authorization Number TXR040012 City of Castlemaine.

The annual report is for Year **1**. The reporting period's beginning 01/01/2019 and ending 12/31/2019.

A separate Notice of Change has not been submitted based on the fact that changes have not been proposed for the next permit year.

As required by the general permit, a copy of the report has been mailed to the TCEQ's regional office 4 in Fort Worth, Texas.

Sincerely,

Robert Castleman, P.E. Director of Public Works Mailing Address and email address

A. General Information

Authorization Number: TXR040{*XXX*}

Reporting Year (year will be either 1, 2, 3, 4, or 5):_____

Annual Reporting Year Option Selected by MS4: (Select 1)

Calendar Year:_____

Permit Year:_____

Fiscal Year: _____ Last day of fiscal year: (_____)

Reporting period beginning date: (month/date/year) _____

Reporting period end date: (month/date/year) _____

MS4 Operator Level: _____ Name of MS4:_____

Contact Name: _____Telephone Number: _____

Mailing Address: _____

E-mail Address: _____

A copy of the annual report was submitted to the TCEQ Region: YES___ NO__ Region the annual report was submitted to: TCEQ Region _____

Levels of Regulated Small MS4s

Traditional MS4s level is based on population

- Level 1 population of less than 10,000 within a UA
- Level 2 population of 10,000 but less than 40,000 within a UA
- Level 3 population 40,000
- but less than 100,000
- Level 4:population of 100,000 +

Non-Traditional Small MS4s

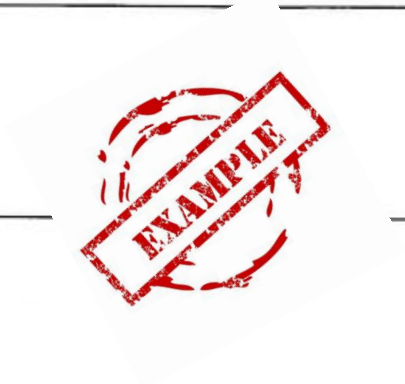
Level 2 also includes all non-traditional small MS4s regardless of the population served

B.1. Status of Compliance with the MS4 GP and SWMP

	Yes	No	Explain
Permittee is currently in compliance with the SWMP as submitted to and approved by the TCEQ.	X		All year 5 BMPs have been completed.
Permittee is currently in compliance with recordkeeping and reporting requirements.	X		The City is in compliance with recordkeeping and reporting.
Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.)	X		No TMDL or Impaired waterbody

B. 2. Assessment of the Appropriateness of BMP

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No, and explain.)
2: Illicit Discharge Detection and Elimination	Map all outfalls and all water bodies receiving discharges from the MS4.	Yes, identified 10 new sources and eliminated 2.
2: Illicit Discharge Detection and Elimination	Perform field screening of 50% of outfalls by December 2020.	Yes, there was an increase in illegal discharge detection through screening.
3/4: Construction Site Control and Post-Construction Site Control	Implement stormwater ordinance for construction and post-construction runoff control	Yes, there were reductions in erosion and sedimentation run-off.



	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (yes or no) Explain.
1. Public Education, Outreach and Involvement	*Participate in Clean Water Clear Choice*	*Yes. The City participated in Clean Water Clear Choice in year 4.*
	Utilize Municipal Website for Public Education and Outreach	*Yes. A SWMP link is included on the website. The website contains a means to report violations.*
	Storm Water Inlet Marking	*Yes. The City Public Works Official checked a quarter of the City inlets for Phase II of the SWIM Program during year 4. The City will continue to check and mark inlets as needed to complete the plan to check/mark all inlets by the end of year 5.*
2. Illicit Discharge Detection and Elimination	*Review and Update MS4 Map*	*Yes. MS4 map was updated in year 4 to reflect recent City maintenance and drainage construction projects.*
	City Staff Education and Training	*No. No new City staff members were hired in year 4. All current City staff members have completed training.*
	Public Reporting of Illicit Discharges and Spills	*No. There were no reports of illicit discharges in year 4.*
	Procedures for Tracing and Removing the Source of Illicit Discharge	*Yes. The Public Works/Code Enforcement Officer and the Building Official are points of contact and are responsible for addressing these concerns.*

B. 3. Pollutant Reduction Analysis

MCM	BMP	Information Used	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No, and explain.)
1	1.1 Public Education	Utility bill stuffers	Mailed 300	Brochures	No. Though this BMP does not result in a direct reduction of pollutants, educating the citizens will eventually reduce litter, hence pollutants
2	2.4 Dry weather screening	Outfalls	20	Inspections	Yes. When illicit discharges are observed, immediate action can be taken to remove the pollutant and track the source
3	3.3 Construction site inspection	Construction sites	5	Inspections	Yes. By inspecting the contractor owned construction sites, we can evaluate if proper BMPs are in place to reduce sediment discharge and erosion

B. 4. Measurable Goals Evaluation

MCM	Measurable Goal(s)	Explain progress toward goal or how goal was achieved
1	Provide utility bill inserts to each utility customer at least once each year.	Met goal – mailed 86,192 inserts with March monthly utility bill
1	Conduct one public meeting or city-wide cleanup day each year.	Exceeded goal: conducted one public meeting and two cleanup days.
2	Map 25% of outfalls and 50% of receiving waters during Year 1 (same as milestone)	Met goal – mapped 20 outfalls out of 80 and 3 of 5 receiving waters
3	Perform site inspections of 25% of all active construction sites.	Did not meet goal. Number of construction sites in city was far above normal for the year. Inspected 20% - 137 out of 548.
3	Respond to 100% of construction complaints received.	Met goal – responded to 193 of 193 construction activity complaints
4	Review all site plans submitted for new development projects.	Met goal – reviewed 127 of 127 site plans submitted
5	Sweep 50% of roads each year.	Exceeded goal – swept 80% of all city streets
6	Inspect 5 industrial facilities	Met goal – inspected 5 industrial facilities

B. 4. Acceptable Measurable Goals

BMP	Required Actions	Deadline/Frequency
Watershed signs	Inspect and maintain existing watershed signs	Frequency: One time per year
Distribution of brochures	Print 1,000 brochures annually, record number of brochures distributed	Frequency for printing: one time per year Frequency for recording distribution of brochures: ongoing
Storm sever map	Update and maintain map; document dates of revisions	Frequency: by December 31 Annually
Spill response and safety – employee training	Train employees at applicable County facilities once per year; maintain log of attendees	December 31 Annually
County-owned facilities and controls inventory	Develop initial inventory of County-owned facilities and stormwater controls	December 31 2015

These Measurable Goals are Not Clear, Specific & Measurable

MCM	Measurable Goal(s)	Explain progress toward goal or how goal was achieved
1	Provide Stormwater education to local school district	Provided 20 brochures on Rain Gardens for placement in lobby
1	Provide educational information and applicability training to public employees	Met Goal-Provided a 30 minute presentation to 22 employees on Good House Keeping
2	Continue to inspect grease traps	Inspected 132 manholes
3	Continue to conduct erosion control site inspections	Did not meet goal. Number of construction sites in city was far above normal for the year. Inspected 20% - 137 out of 548.

C. Stormwater Data Summary

Provide a summary of all information used including any monitoring results to assess the success of the SWMP at reducing the discharge of pollutants to the MEP.

Summary Example:

- Weekly SWP3 inspections for 4 active construction sites
- Bi-annual inspections of 36 MS4 outfalls for dry weather flow and maintenance needs
- Annual inspections of 41 post-construction BMPs for maintenance needs
- Twelve incidents of illicit discharges were reported

D. Impaired Waterbodies Part

D. 1. Identify if an impaired water within the permitted area has been added to the latest EPA approved *Texas Integrated Report of Surface Water Quality for CWA Sections 305(b) and 303(d).*

List newly-identified impaired waters below include waterbody, the impairment category (4 With TMDL Watershed or 5 impaired no TMDL) and the cause of impairment.

Example:

Segment ID/Name: 0222 Salt Fork Red River
Impairment: Bacteria
TMDL: Yes____ No_√ _

Texas Integrated Report Index of Water Quality Impairments for CWA Sections 305(b) and 303(d) categories 4 and 5 water bodies.

- Category 4 - CWA 305 (b), *with* watershed TMDL
- Category 5 - CWA 303(d) for stream segment, impaired but no TMDL

2016 Texas Integrated Report - Texas 303(d) List (Category 5)

SegID: 0105 **Rita Blanca Lake**
Rita Blanca Lake - from Rita Blanca Dam in Hartley County up to the normal pool elevation of 3860 feet (impounds Rita Blanca Creek)

Impairment Description(s)	*Category*	*Year Segment First Listed*
chloride	**5b**	**2014**

0105_01 Rita Blanca Lake from Rita Blanca Dam up to the normal pool elevation of 3860 feet

Impairment Description(s)	*Category*	*Year Segment First Listed*
pH	**5b**	**2006**

0105_01 Rita Blanca Lake from Rita Blanca Dam up to the normal pool elevation of 3860 feet

SegID: 0201A **Mud Creek**
Mud Creek - from the confluence of the Red River upstream to the headwater near the intersection of US 82 and Bowie CR 3403

Impairment Description(s)	*Category*	*Year Segment First Listed*
bacteria (Recreation Use)	**5b**	**2002**

0201A_01 Mud Creek from the confluence of the Red River upstream to the headwater near the intersection of US 82 and Bowie CR 3403

Impairment Description(s)	*Category*	*Year Segment First Listed*
depressed dissolved oxygen	**5c**	**2006**

0201A_01 Mud Creek from the confluence of the Red River upstream to the headwater near the intersection of US 82 and Bowie CR 3403

Use most recent EPA approved report!

D. Impaired Waterbodies

D. 2. If applicable, explain below any activities taken to address the discharge to impaired waterbodies, including any sampling results and a summary of the small MS4's BMPs used to address the pollutant of concern

Example: The MS4 reduces bacteria in the watershed by repairing sanitary sewer systems, reducing illicit discharges and dumping, controlling animal sources, and educating the public.

Impaired Waterbodies

D. 3. Describe the implementation of targeted controls if the MS4 discharges to impaired waterbody with an approved TMDL

Examples:

1. Sanitary Sewer Systems - The City continues to make improvements to its sanitary sewer infrastructure to reduce overflows and update aging system through sanitary sewer improvements.

2. The City continues to target pet waste disposal programs to reduce the amount of pollutant contributions from pet waste, especially at parks.

D. 4. Analysis of BMPs to Achieve Benchmark

Benchmark Parameter (Ex: Total Suspended Solids)	**Benchmark Value**	**Description of additional sampling or other assessment activities**	**Year(s) conducted**
Bacteria	837.68 Billion MPN/day	Perform visual Inspection throughout City including construction activity site inspection	**Permit Years 1-4**

D. 5. Analysis of BMPs to Achieve Benchmark

Benchmark Parameter	Selected BMP	Contribution to achieving Benchmark
Bacteria	Reporting of Sanitary Sewer Overflows	Monthly reporting Sanitary Sewer Overflows at board meetings will provide vital statistics to ensure proper management of these pollution causing events.
Bacteria	Illicit Discharges and Dumping	Designating a point of contact and providing residents with contact information enables resident reporting of illicit discharges

D. 6. BMPs to Address Impairment for Bacteria

Description of bacteria-focused BMP	Comments/Discussion
Illicit Discharges and Dumping	The city has adopted an ordinance and designated a point of contact for reporting making it possible to report and fine offenders.
Respond to Illicit Discharges and Dumping	Respond to 100% each permit year of reported Illicit Discharges and Dumping

D. 7. BMP's Effective in Achieving Benchmark

Benchmark Indicator	Description/Comments
Number of sources identified or eliminated	Responded and eliminated all report Illicit Discharges that were actually Illicit discharges
Decrease in number of illegal dumping	Catching and fining those responsible for illegal dumping
Reductions in sanitary sewer flows	Repaired sanitary sewer

E. Stormwater Activities for Next Reporting Year

MCM(s)	BMP	Stormwater Activity	Description/Comment
1	Anti-littering/ dumping Brochure	Develop Educational material	Develop brochure and place in District office
2	Illicit Discharge Detection and Elimination Program	Periodic dry weather sampling	Continue sampling monthly

F.1 SWMP Modifications
SWMP and MCM Review Review

The MS4 shall conduct an annual review of its SWMP in conjunction with the preparation of the annual report required by TXR040000 Part IV.B.2

F.2 SWMP Modifications

1. Changes have been made or are proposed to the SWMP since the NOI or the last annual report, including changes in response to TCEQ's review.

   _X_ Yes ____ No

   If 'Yes', report on changes made to measurable goals and BMPs

MCM(s)	Measurable Goal(s) or BMP(s)	Implemented or Proposed Changes (Submit NOC as needed)
1	Local Newsletter/ Paper Storm Water Quality brochure	Changing amount of brochures distributed from 300 to 600

Notice of Change

Submit NOC to TCEQ's Applications Review and Processing Team (MC-148)

DO NOT SUBMIT NOC WITH THE ANNUAL REPORT

REGULAR U.S. MAIL:
Texas Commission on Environmental Quality
Applications Review and Processing Team (MC-148)
P.O. Box 13087
Austin, Texas 78711-3087

OVERNIGHT/EXPRESS MAIL:
Texas Commission on Environmental Quality
Applications Review and Processing Team (MC-148)
12100 Park 35 Circle
Austin, TX 78753

G. Additional BMPs for TMDLs and I-Plans

BMP	Description	Implementation Schedule (Start Date etc.)	Status / Completion Date (completed, in progress, not started)
Dumpster Control	Ensure that contaminated material is contained to prevent solid and/or liquid waste from being washed into storm sewer systems	January Year 3 Develop Ordinance for proper maintenance of dumpsters	In Progress

H. 1. Additional Information

1. Is the permittee relying on another entity to satisfy any permit obligations?

_X__ Yes ___ No

If "Yes," provide the name(s) of other entities and an explanation of their responsibilities (add more spaces or pages if needed).

Name and Explanation: West Bayou MUD has responsibility to comply with the Phase II MS4 permit and implement the SWMP in it WBMUD boundary

H.2.a. Additional Information

2.a. Is the permittee part of a group sharing a SWMP with other entities?

_X__ Yes ___ No

2.b. If "yes," is this a system-wide annual report including information for all permittees?

_X__ Yes ___ No

If "Yes," list all associated authorization numbers, permittee names, and SWMP **responsibilities of each** member (add additional spaces or pages if needed):

Authorization Number: _____ Permittee:_____
Responsibilities of the Permittee_____

I. Construction Activities

1. The number of construction activities that occurred in the jurisdictional area of the MS4 (Large and Small Site Notices submitted by construction site operators):

_____10_____

2a. Does the permittee utilize the optional seventh MCM related to construction?

___ Yes _x_ No

2b. If "yes," then provide the following information for this permit year:

The number of municipal construction activities authorized under this general permit	**NA**
The total number of acres disturbed for municipal construction projects	**NA**

Note: *Though the seventh MCM is optional, implementation must be requested on the NOI or on a NOC and approved by the TCEQ.*

J. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based 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.

Name (printed):_____ Title:_____
Signature: _____ Date:_____
Name of MS4_____

Original signature in blue ink

J. Signed Certification Page is Required for Each Coalition Member

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.

Name (printed):_____ Title:_____
Signature: _____ Date:_____
Name of MS4_____

Original signature in blue ink

Annual Report - three key items

Should clearly illustrate the following for each SWMP area:

- ✓ Summary of only the Reporting Year's Activities
- ✓ Description of SWMP Effectiveness
- ✓ Planned Activities and Changes

Common Reasons why Additional Information is Required

- Original Report was not submitted
- Section left blank (IF not applicable mark “N/A”)
- Current updated template was not used
- Use wrong Authorization Number
- Impaired waters information was left blank
- Reporting Dates missing
- Late

Annual Report - Things to Remember

- Use **letterhead and DATE** the cover letter
- Use the approved TCEQ Template
- Additional supporting information is not needed: *e.g.*, presentations, brochures, etc.
- No binders or CDs
- Do not include the instruction with the annual report

Contact Information

- Small Business and Local Government Assistance
  (800) 447-2827
  texasenvirohelp@tceq.Texas.gov
  www.tceq.Texas.gov/assistance

- Permitting Information (Technical)
  (512) 239-4671
  swgp@tceq.Texas.gov
  www.tceq.Texas.gov/permitting/stormwater

TPDES Stormwater Program Contacts

Water Quality Division – Stormwater Team

- Rebecca L. Villalba, Team Leader
  - Hanne Lehman Nielsen
  - Dan Siebeneicher
  - Macayla Coleman
  - Alyssa Cook
  - Dalila Loiacomo

Austin Office: (512) 239-4671