Utilizing the Stormwater Management Program Template (RG- 646)

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Background

- **What is the purpose of the template and who can use it?**

The Stormwater Management Program Template (SWMP) (RG-646) was designed by Small Business and Local Government Assistance (SBLGA) according to the requirements of the 2024 General Permit as a resource for Level 1 and Level 2 MS4's to develop their SWMP. However, the template can also be utilized as guidance for Level 3 and 4 MS4's by modifying it to include the additional required Best Management Practices (BMPs) for each Minimum Control Measure (MCM) as applicable.

- **Where can I find it?**

The template is available for download on SBLGA's Assistance Page :

RG-646: Stormwater Management Program Template for Phase II (Small) Level 1 and 2 MS4s - Texas Commission on Environmental Quality - www.tceq.texas.gov

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

MCM 1: Public Education and Outreach

Target Appropriate Audiences for Education and Outreach Programs

At a minimum, include the following target audiences:

- ***Traditional MS4s and counties*** must address the <u>residents served by the MS4</u>.
- **Non-traditional MS4s** (other than counties) must address the <u>community served by the MS4</u>.

  - Universities target the faculty, staff, and students.
  - Military bases target military personnel (and dependents), and employees (including contractors).
  - Prison complexes or other multi-building complexes target staff and contractors.
  - Municipal Utility Districts and other special districts target residents served, staff, and contractors.
  - Transportation authorities address staff, contractors, and users

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MCM 1: Public Education and Outreach

Target Specific Pollutants

Identify <u>at least one</u> target pollutant for *each* target audience.

- More than one target pollutant may be implemented to address pollutants in stormwater discharges to the maximum extent practicable (MEP).
- The target pollutant must be appropriate for the target audience.
- The same pollutant may be used for more than one target audience and the target pollutant(s) may change annually as needed.

Target Audience	Target Pollutant(s)
Construction Operations	Sediment Runoff
General Public	Pet waste, grass clippings, illegal dumping
Restaurants	Grease and Oil

Figure 1. Examples of Target Audiences and Target Pollutants

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MCM 1: Public Education and Outreach

You can partner with other entities or MS4 operators to maximize cost effectiveness of the required outreach. To support an activity completed by another entity, conduct <u>at least one</u> of the following or a similar activity:

- Plan (or assist with planning) the distribution of materials
- Coordinate volunteers.
- Contribute supplies, materials, tools, or equipment.
- Help distribute materials.
- Provide financial support

MS4 Level	Required Number of BMPs
Level 1	Three
Level 2a and 2b	Four
Levels 3 and 4	Five

Figure 2. MS4 Levels with Minimum Number of Public Education and Outreach BMPs

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MCM 1: Public Education and Outreach

1. Identify How BMPs Relate to the Target Audience and Target Pollutant(s)

Outreach should be relevant and relate to the target pollutant. For example, if you discharge into an impaired water body, design your BMPs to reduce the discharge of POCs.

Examples of targeted outreach include:

• A newsletter sent to automotive mechanics about new ordinances against illegal dumping and discharges.

• An electronic fact sheet about hazardous household waste disposal sent to residents after they apply for trash or recycling services

2. Identify the Measurable Goal for Each BMP Selected

You may change BMPs during the permit cycle if determined appropriate through annual reviews. Identify any changes to BMPs used throughout the permit term on the given worksheet.

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MCM 1: Public Education and Outreach

BMP/Activity	Target Audience	Target Pollutant	Measurable Goal
Social media post/campaign	General Public	Pet Waste	Post a minimum of four times each year on a minimum of one social media platform.
Maintain or mark storm drains and inlets with, "No Dumping – Drains to Creek" or a similar message.	Users	Illegal Disposal of Household Hazardous Waste	Placard, stencil, or paint a minimum of 10% of all known stormwater inlets in either high-impact areas identified by the small MS4 operator or impairment watersheds within the MS4 area each year.
Publish articles in local newspaper or newsletter, may be electronic.	Community	Grass clippings and leaf litter	A minimum of two articles must be published or emailed to target audience groups each year.

MCM 2: Public Involvement and Participation

Create or Support Public Involvement and Participation

You may partner with and support other MS4 operators to maximize cost effectiveness of the required public involvement and participation activities. Support must include <u>at least one </u>of the following or similar:

- Assist with planning of the event or activity
- Recruit volunteers
- Advertise for events
- Provide an event location (e.g., arrange land or stream access)
- Provide financial support
- Contribute supplies, materials, tools, or equipment
- Supply disposal service

MS4 level	Required Number of BMPs
Level 1	Two
Level 2a and 2b	Three
Levels 3 and 4	Four

Figure 3. Implement the Appropriate Number of Public Involvement and Participation Opportunities

MCM 2: Public Involvement and Participation

| Activity/BMP	Measurable Goal
Stormwater speaker series	Provide at least two sessions each year. These may be different speakers or audiences
Public education events and workshops	Host at least one project or training annually on stormwater topics.
Educational display/booth	Create one booth or display annually at a school, public event, or similar event that provides information or displays to improve public understanding of issues related to water quality.

Figure 4. Example BMPs with Measurable Goals for MCM 2

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MCM 3: Illicit Discharge Detection and Elimination

Maintain a Current and Accurate MS4 Map.

The map must include:

• The location of <u>all</u> the outfalls operated by the MS4 that discharge into Waters of the U.S.

• The location and name of all surface waters receiving discharges from the outfalls.

• Date of last revision.

Figure 1. MS4 Map Example

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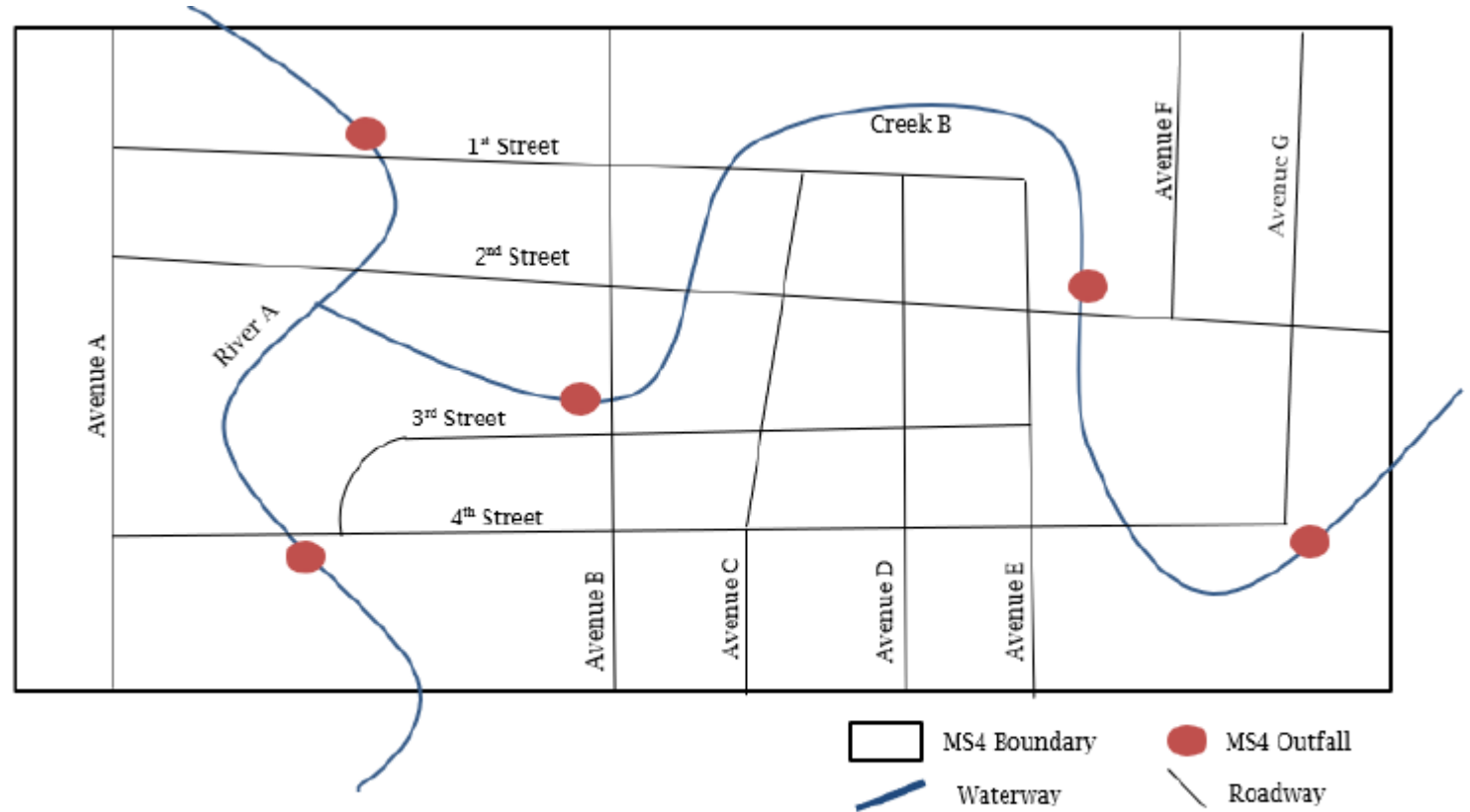
MCM 3: Illicit Discharge Detection and Elimination

Educate and Train Employees on IDDE

Conduct <u>at least one</u> training annually for <u>100%</u> of field staff that may encounter or observe illicit discharges, illegal dumping, or illicit connections during normal job duties or responsibilities.

Document Training Activities

Maintain training attendance records for review by TCEQ when request.

IDDE Education and Training: Worksheet

Employee Training Date: _____

Training Topics	Covered?	
MS4 Permit Requirements	☐ Yes	☐ No
Emergency Response Contact Information	☐ Yes	☐ No

How was training provided?

☐ Live Presentation   ☐ Recorded Videos   ☐ Reading Material
☐ Other _____

Training Attendance Log

Name	Title	Signature

Figure 5. Example IDDE Training Log

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MCM 3: Illicit Discharge Detection and Elimination

Maintain and Facilitate a Public Reporting Method

- The public should have <u>at least one</u> method to report illicit discharges, illegal dumping, or water quality impacts associated with discharges.

- All MS4s must publicize their reporting method <u>at least twice annually</u> in a way designed to reach most of the intended audience.

- If you have a public website, you are required to *continuously* maintain and publicize the reporting function on the website.

- To determine the effectiveness of your publicized BMP, develop and implement a **tracking system** to estimate what percentage of the intended audience is reached.

Public Reporting Methods
Hotline
Webpage
Posted Sign(s)
Pamphlets

Figure 6. Example Public Reporting Methods

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MCM 3: Illicit Discharge Detection and Elimination

Develop and Maintain IDDE Response Procedures

Describe how your MS4 monitors and responds to IDDE complaints and emergencies.

Procedures may include:

• Emergency response contact information
• How to monitor and manage incoming complaints
• Instructions for necessary reports such as how your MS4 will respond to emergency spills

Review and update the procedures <u>at least once annual</u>ly to address changes and make improvements to the procedures when necessary.

MCM 3: Illicit Discharge Detection and Elimination

Investigate and Eliminate Illicit Discharges and Illegal Dumping

Investigate all reports of illicit discharges and illegal dumping. Prioritize the investigations of discharges and dumping incidents based on their risk of pollution.

• Respond to all high priority discharges **within 24 hours.** An example of a high priority discharge would be a sanitary sewer discharge.
• Complete an investigation worksheet for every source investigation conducted.
• Immediately notify TCEQ of the occurrence of any illicit flows believed to be an immediate threat to human health or the environment.
• Notify the responsible party and require them to perform all necessary corrective actions to eliminate the illicit discharge and illegal dumping.
• For illicit discharges and illegal dumping incidents where your MS4 does not have authority, the adjacent MS4 operator or applicable TCEQ regional office should be notified. If your program is a **Level 2b MS4** who reports events to another agency, specify which agency and their contact information.

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MCM 3: Illicit Discharge Detection and Elimination

- What was the source of the illicit discharge or illegal dumping?
- Did you observe any active discharges during your investigation? If so, please describe?
- Investigation Findings
- Are any corrective actions needed?
- Will any other agency or TCEQ regional office need to be contacted?
- Will a follow-up investigation be conducted? When?

Figure 7. Example Worksheet of Source Investigation and Elimination

MCM 3: Illicit Discharge Detection and Elimination

Develop and Maintain Inspection Procedures

Develop written procedures describing the basis for conducting inspections in response to complaints and follow-up inspections to ensure corrective measures have been taken. Inspection instructions must be reviewed <u>at least once</u> annually to address changes and make improvements.

Keep Records of Inspections in Response to Complaints

Complete an IDDE Inspection Worksheet for every inspection conducted. Be sure to clearly note:

• The date that the complaint was received.
• The date and time that the inspection started.
• If this was an initial or follow-up inspection.
• The location of the inspection.

Provide information on the original complaint, if any active discharges were observed during the inspection, and if any corrective action or follow-up inspections are needed.

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MCM 3: Illicit Discharge Detection and Elimination

IDDE Inspection: Worksheet

Date Complaint Received:	
Open Inspection Date and Time:	
Initial or Follow-up Investigation:	
Location of Inspection:	
Name(s) of Inspector(s):	
Priority of Illicit Discharge:	☐ Low ☐ Medium ☐ High
Close Inspection Date and Time:	

Complaint Information:

Complainant Name: _____

Complainant Contact Information: _____

Additional Notes:

_____

Figure 8. Example IDDE Inspection Worksheet

MCM 3: Illicit Discharge Detection and Elimination

Develop Procedures to Prevent and Correct Any Leaking OSSFs

For **Level 2 MS4s**, identify _all_ OSSFs in the MS4 area and keep track of their status each year.

- Develop procedures to address failing and poorly maintained systems.

- Investigate and address **100%** of all OSSF complaints reported through the MS4's public reporting mechanisms.

- Review and update the inventory of all identified OSSFs and their status <u>at least once annually </u>to address changes or additions by your MS4.

- If your MS4 discharges bacteria to impaired water bodies with a TCEQ and EPA approved TMDL, your BMPs should:
  - Identify and address failing systems
  - Address poor maintenance of OSSFs

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MCM 4: Construction Site Stormwater Runoff Control

Develop and Maintain City Ordinances

Require all construction site operators to implement appropriate erosion and sediment control BMPs. The stormwater control program should ensure erosion and sediment controls, soil stabilization, and BMP requirements are effectively implemented for all construction activities discharging stormwater into your regulated area consistent with the TPDES CGP, TXR150000.

Implement Site Plan Review Procedures

Develop and maintain procedures for reviewing construction site plans. Describe which plans will need review and when an operator can begin construction. Non-traditional MS4s must conduct inspections of sites operated by the MS4 or contractors that are located in the MS4's regulated area. Site plan review procedures should include:

- Consideration of potential water quality impacts.
- Site-specific construction site control measures that meet the requirements of TPDES CGP TXR150000.

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MCM 4: Construction Site Stormwater Runoff Control

Implement Site Plan Review Procedures (continued)

Implement site plan review procedures for all new construction projects each year. Review and update the procedures for your site plan review <u>at least once annually</u> to address changes and make improvements to the procedures if necessary.

Note: You may require and accept plans, such as a stormwater pollution prevention plans, for review as part of your site plan review.

Implement Site Inspection Procedures

- Develop and maintain procedures for inspecting active construction projects. Non-traditional MS4s must conduct inspections of sites operated by the MS4 or contractors that are located in the MS4's regulated area.
- Conduct inspections of at least **80%** of *active* construction sites <u>annually</u> according to the established procedures (or some Level 2b small MS4s must notify the appropriate agency with the authority to act).

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MCM 4: Construction Site Stormwater Runoff Control

Complete Site Inspection Reports

- Conduct inspections of at least **80%** of active construction sites <u>annually</u>.

- Following a construction site inspection, inspector(s) must provide a written or electronic inspection report to the site operator(s).

- Based on inspection findings, you should take all necessary follow-up actions to ensure compliance with permit requirements and the SWMP.

- Follow-up inspections and enforcement actions must be tracked, and records must be maintained for review by TCEQ when requested.

Construction Site Inspection Report: Worksheet

Inspection Date:	
Name(s) of Inspector(s):	
Site Name:	
TPDES Permit #:	
Site Contact Name:	
Site Contact Information:	

Does the site have active CGP TXR150000 coverage?

☐ Yes ☐ No

If no, were site operator(s) notified that they need to obtain CGP TXR150000 coverage?

☐ Yes ☐ No

Have stormwater control measures been properly implemented and maintained?

☐ Yes ☐ No (describe below)

Figure 9. Example Construction Site Inspection Report Worksheet

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MCM 4: Construction Site Stormwater Runoff Control

Create Procedures for Processing Public Comments

- Develop, implement, and maintain procedures for receiving and considering information submitted by the public. Throughout the permit term, maintain <u>one</u> webpage, hotline, email, or a similar method for receiving information submitted by the public.
- Review and update procedures <u>at least once annually</u> to address changes and make improvements to the procedures if necessary.

Educate and Train Employees
Conduct <u>at least one</u> training <u>annually</u> for **100%** of all MS4 staff whose primary job duties are related to implementing the construction stormwater program.

Document Training Activities
Record the training date, topics covered, etc.

MS4 Staff Training: Log Sheet

Employee Training Date: _____

Training Topics	Covered?	
MS4 Permit Requirements	☐ Yes	☐ No
Construction Stormwater Program	☐ Yes	☐ No

How was training provided?

☐ Live Presentation   ☐ Recorded Videos   ☐ Reading Material

☐ Other   _____

Training Attendance Log

Name	Title	Signature

Figure 10. Example Log Sheet for MS4 Staff Training

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MCM 5: Post Construction Stormwater Management in New Development and Redevelopment

Develop and Maintain City Ordinances

- You must use an <u>ordinance or another regulatory mechanism</u> to address post-construction runoff from new development and redevelopment projects.

- Establish, implement, and enforce a requirement that owners or operators of new development and redeveloped sites must design, install, implement, and maintain a combination of <u>structural and non-structural BMPs</u> appropriate for the community and protective of water quality.

- If the construction of permanent structures is not feasible due to space limitations, health and safety concerns, cost effectiveness, or highway construction codes, your MS4 may propose an alternative approach to TCEQ.

- Review and update ordinances or other regulatory mechanisms <u>at least once</u> during the permit term to address changes and make improvements to ordinances if necessary.

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MCM 5: Post Construction Stormwater Management in New Development and Redevelopment

Follow recordkeeping requirements

- Document and maintain records of enforcement actions and make them available for review by TCEQ when requested.

- Maintain records of **100%** of enforcement actions taken <u>each year </u>and make the records available to TCEQ for review within of a request.

Create a Maintenance Plan for Structural Stormwater Control Measures

- Maintenance performed by the MS4; *and*

- Maintenance performed by the owner or operator of a new development or redeveloped site under a maintenance plan.

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MCM 5: Post Construction Stormwater Management in New Development and Redevelopment

Long-Term Maintenance of Post-Construction Stormwater Control Measures: Worksheet

Site Name:	
Site Address:	
Site Contact:	
Site Contact Information:	

Will post-construction stormwater control measures be maintained by your MS4 or by the site's owners or operators?

☐ MS4 operators

☐ Construction site operators

☐ Combination of both

If maintenance is performed by the construction site owner or operator:

Has a maintenance plan been developed and implemented?

☐ Yes   ☐ No

Is the maintenance plan filed in the real property records of the proper county?

☐ Yes   ☐ No

Are maintenance operations documented and retained on-site for review by the MS4?

☐ Yes   ☐ No

Figure 11. Example MCM 5 Worksheet

MCM 6: Pollution Prevention and Good Housekeeping for Municipal Operations

Create an Inventory of Facilities and Stormwater Controls

Develop and maintain an inventory of facilities and stormwater controls you own and operate in your MS4's regulated area.

- Recycling and composting facilities
- Equipment storage and maintenance facilities
- Fuel and material storage sites
- Golf courses and swimming pools
- Landfills and hazardous waste disposal facilities
- Buildings such as schools, libraries, police stations, fire stations, and office buildings
- Public works yards

Review and update the inventory <u>at least once annually</u> to address changes or additions to the facilities and stormwater controls.

MS4-Owned Facilities and Control Inventory: Worksheet

Facility name:	
TPDES Permit #:	
Registration #:	
Authorization:	
Facility address:	
Stormwater controls:	

Figure 12. Example Inventory Worksheet

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MCM 6: Pollution Prevention and Good Housekeeping for Municipal Operations

- **Train MS4 Employees and Document Training**

    Train all employees and contractors involved in implementing pollution prevention and good housekeeping practices. Conduct this training <u>at least once annually</u>

- **Develop Contractor Oversight Procedures**

    Any contractors hired to perform maintenance activities on an MS4's facilities must be contractually required to comply with all stormwater control measures, good housekeeping practices, and facility-specific stormwater management operating procedures.

- **Implement Pollution Prevention Measures**

    Develop a set of pollution prevention measures to reduce the discharge of pollutants listed in the O&M Evaluation Worksheet.

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MCM 6: Pollution Prevention and Good Housekeeping for Municipal Operations

- **Identify Potential Pollutants and Sources**

- **Develop Pollution Prevention Inspection Procedures**

  - At least once annually, visually inspect **100%** of all pollution prevention measures implemented at MS4-owned facilities to ensure that they are working properly.

  - Develop written procedures that describe the frequency of inspections and how to conduct them.

  - Review and update the inspection procedures at least once annually to address changes or additions to the pollution prevention measures.

Potential Pollutants	Potential Pollutant Sources
Paint, Paving Materials, Sediment	Road and Parking Lot Maintenance
Herbicides, Pesticides, Trash	Right of Way Maintenance
Deicing and Anti-Icing Compounds	Cold Weather Operations

Figure 13. Example of Potential Pollutants and Sources

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MCM 6: Pollution Prevention and Good Housekeeping for Municipal Operations

Develop Structural Control Maintenance Procedures

- <u>At least once annually</u>, perform necessary maintenance on stormwater structural controls.

- Develop written procedures that describe the frequency of inspections and how to conduct them.

- Review and update the maintenance <u>procedures at least once annually</u> to address changes or additions to the pollution prevention measures.

O&M Pollution Prevention Inspection: Log Sheet	
Inspector Name:	
Inspection Date:	
Site Name:	
Site Address:	
Site Contact:	
Site Contact Information:	

Figure 14. Example of O&M Inspection Log Sheet

Structural Control	Inspection Frequency	Maintenance Requirements

Figure 15. Example of Structural Control Inspection Log

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Impaired Water Bodies and Total Maximum Daily Load (TMDL) Requirements

If your MS4 discharges to an **impaired water body with an approved TMDL**, *and* stormwater has the potential to cause or contribute to the impairment, then you will need to:

• Identify controls used on-site to target POCs.

• Set benchmarks and measurable goals.

• Develop a monitoring and assessment plan.

Figure 16. Example of Identifying Impaired Waterbody with TMDL Requirements

Questions?