# Administrative Package Cover Page

**This file contains the following documents:**

1. Summary of application (in plain language)
   - English
   - Alternative Language (Spanish)
2. First Notice (NORI-Notice of Receipt of Application and Intent to Obtain a Permit)
   - English
   - Alternative Language (Spanish)
3. Application materials

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# Portada de Paquete Administrativo

**Este archivo contiene los siguientes documentos:**

1. Resumen en lenguaje sencillo (PLS, por sus siglas en inglés) de la actividad propuesta
   - Inglés
   - Idioma alternativo (español)
2. Primer aviso (NORI, el Aviso de Recepción de Solicitud e Intención de Obtener un Permiso)
   - Inglés
   - Idioma alternativo (español)
3. Solicitud original

**English Template for TPDES New/Renewal/Amendment Applications**

**Phase I MS4 Stormwater**

*The following summary is provided for this pending water quality permit application being reviewed by the Texas Commission on Environmental Quality as required by 30 Texas Administrative Code Chapter 39. The information provided in this summary may change during the technical review of the application and are not federal enforceable representations of the permit application.*

The City of Laredo, CN600131908, and its co-applicant Laredo College, CN601429350, operate the City of Laredo MS4, RN103014353, a municipal separate storm sewer system owned and operated by the applicants through which stormwater from all areas, except for agricultural lands, located within the City of Laredo are discharged to various ditches and tributaries that eventually reach Rio Grande Below Amistad Reservoir in Segment Number 2304 of the Rio Grande Basin. The MS4 is located in the City of Laredo, Webb County, Texas, 78040, 78041, 78042, 78043, 78044, 78045, 78046, and 78049.

The City of Laredo and LCC are seeking a renewal of existing TPDES Permit No. WQ0004592000.

Discharges from the MS4 are expected to contain stormwater from all areas of the City of Laredo, except agricultural land. Stormwater discharges from the City of Laredo MS4 are managed in accordance with TPDES Permit No. WQ0004592000 and the TCEQ-approved Storm Water Management Programs.

**PLANTILLA EN ESPAÑOL PARA SOLICITUDES**
**NUEVAS/RENOVACIONES/ENMIENDAS DE TPDES FASE I MS4 AGUAS PLUVIALES**

*El siguiente resumen se proporciona para esta solicitud de permiso de calidad del agua pendiente que está siendo revisada por la Comisión de Calidad Ambiental de Texas según lo requerido por el Capítulo 39 del Código Administrativo de Texas 30. La información proporcionada en este resumen puede cambiar durante la revisión técnica de la solicitud y no son representaciones federales exigibles de la solicitud de permiso.*

La Ciudad de Laredo, CN600131908, y su co-solicitante Laredo College, CN601429350, operan la Ciudad de Laredo MS4, RN103014353, un sistema municipal separado de alcantarillado pluvial propiedad y operado por los solicitantes a través del cual fluyen las aguas pluviales de todas las áreas, excepto las tierras agrícolas. , ubicados dentro de la Ciudad de Laredo, se descargan en varias zanjas y afluentes que eventualmente llegan al Río Grande Debajo del Embalse Amistad en el Segmento Número 2304 de la Cuenca del Río Grande. La MS4 está ubicada en la ciudad de Laredo, condado de Webb, Texas, 78040, 78041, 78042, 78043, 78044, 78045, 78046 y 78049.

La Ciudad de Laredo y LC están buscando una renovación del Permiso TPDES No. WQ0004592000 existente.

Se espera que las descargas de la MS4 contengan aguas pluviales de todas las áreas de la ciudad de Laredo, excepto las tierras agrícolas. Las descargas de aguas pluviales de la ciudad de Laredo MS4 se gestionan de acuerdo con el permiso TPDES n.º WQ0004592000 y los programas de gestión de aguas pluviales aprobados por la TCEQ.

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

## NOTICE OF RECEIPT OF APPLICATION AND INTENT TO OBTAIN A MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT RENEWAL

### PERMIT NO. WQ0004592000

**APPLICATION.** City of Laredo, 1110 Houston Street, Laredo, Texas 78040 and Laredo Community College, 1 West End Washington Street, Laredo, Texas 78040, have applied to the Texas Commission on Environmental Quality (TCEQ) to renew Texas Pollutant Discharge Elimination System (TPDES) Permit No. WQ0004592000 (EPA I.D. No. TXS001401) to authorize discharges from the municipal separate storm sewer system located within the corporate boundary of the City of Laredo, except agricultural lands, in Webb County, Texas 78040, 78041, 78042, 78043, 78044, 78045, 78046, and 78049. The discharge route is from the municipal separate storm sewer system to the surface water in the State. TCEQ received this application on April 17, 2024. The permit application will be available for viewing and copying at Laredo City Hall, 1110 Houston Street, Laredo, Texas prior to the date this notice is published in the newspaper. The application, including any updates, and associated notices are available electronically at the following webpage: https://www.tceq.texas.gov/permitting/wastewater/pending-permits/tpdes-applications.

**ALTERNATIVE LANGUAGE NOTICE.** Alternative language notice in Spanish is available at: https://www.tceq.texas.gov/permitting/wastewater/pending-permits/tpdes-applications.
El aviso de idioma alternativo en español está disponible en https://www.tceq.texas.gov/permitting/wastewater/pending-permits/tpdes-applications.

**ADDITIONAL NOTICE.** TCEQ's Executive Director has determined the application is administratively complete and will conduct a technical review of the application. After technical review of the application is complete, the Executive Director may prepare a draft permit and will issue a preliminary decision on the application. **Notice of the Application and Preliminary Decision will be published and mailed to those who are on the county-wide mailing list and to those who are on the mailing list for this application. That notice will contain the deadline for submitting public comments.**

**PUBLIC COMMENT / PUBLIC MEETING. You may submit public comments or request a public meeting on this application.** The purpose of a public meeting is to provide the opportunity to submit comments or to ask questions about the application. TCEQ will hold a public meeting if the Executive Director determines that there is a significant degree of public interest in the application or if requested by a local legislator. A public meeting is not a contested case hearing.

**OPPORTUNITY FOR A CONTESTED CASE HEARING.** After the deadline for submitting public comments, the Executive Director will consider all timely comments and prepare a response to all relevant and material, or significant public comments. **Unless the application is directly referred for a contested case hearing, the response to comments, and the Executive Director's decision on the application, will be mailed to everyone who submitted public comments and to those persons who are on the mailing list for this application. If comments are received, the mailing will also provide instructions for requesting reconsideration of the Executive Director's decision and for requesting**

**a contested case hearing.** A contested case hearing is a legal proceeding similar to a civil trial in state district court.

**TO REQUEST A CONTESTED CASE HEARING, YOU MUST INCLUDE THE FOLLOWING ITEMS IN YOUR REQUEST: : your name, address, phone number; applicant's name and proposed permit number; the location and distance of your property/activities relative to the proposed facility; a specific description of how you would be adversely affected by the facility in a way not common to the general public; a list of all disputed issues of fact that you submit during the comment period and, the statement "[I/we] request a contested case hearing." If the request for contested case hearing is filed on behalf of a group or association, the request must designate the group's representative for receiving future correspondence; identify by name and physical address an individual member of the group who would be adversely affected by the proposed facility or activity; provide the information discussed above regarding the affected member's location and distance from the facility or activity; explain how and why the member would be affected; and explain how the interests the group seeks to protect are relevant to the group's purpose.**

Following the close of all applicable comment and request periods, the Executive Director will forward the application and any requests for reconsideration or for a contested case hearing to the TCEQ Commissioners for their consideration at a scheduled Commission meeting.

The Commission may only grant a request for a contested case hearing on issues the requestor submitted in their timely comments that were not subsequently withdrawn. **If a hearing is granted, the subject of a hearing will be limited to disputed issues of fact or mixed questions of fact and law relating to relevant and material water quality concerns submitted during the comment period. TCEQ may act on an application to renew a permit for discharge of wastewater without providing an opportunity for a contested case hearing if certain criteria are met.**

**MAILING LIST.** If you submit public comments, a request for a contested case hearing or a reconsideration of the Executive Director's decision, you will be added to the mailing list for this specific application to receive future public notices mailed by the Office of the Chief Clerk. In addition, you may request to be placed on: (1) the permanent mailing list for a specific applicant name and permit number; and/or (2) the mailing list for a specific county. If you wish to be placed on the permanent and/or the county mailing list, clearly specify which list(s) and send your request to TCEQ Office of the Chief Clerk at the address below.

**INFORMATION AVAILABLE ONLINE.** For details about the status of the application, visit the Commissioners' Integrated Database at www.tceq.texas.gov/goto/cid. Search the database using the permit number for this application, which is provided at the top of this notice.

**AGENCY CONTACTS AND INFORMATION.** Public comments and requests must be submitted either electronically at https://www14.tceq.texas.gov/epic/eComment/, or in writing to the Texas Commission on Environmental Quality, Office of the Chief Clerk, MC-105, P.O. Box 13087, Austin, Texas 78711-3087. Please be aware that any contact information you provide, including your name, phone number, email address and physical address will become part of the agency's public record. For more information about this permit application or the permitting process, please call the TCEQ Public Education Program, Toll Free, at 1-800-687-4040 or visit their website at www.tceq.texas.gov/goto/pep. Si desea información en Español, puede llamar al 1-800-687-4040.

Further information may also be obtained from City of Laredo and Laredo Community College at the address stated above or by calling Mr. John Porter, REM, CFM, CPM, Acting Director, City of Laredo - Environmental Services Department, at 956-727-7944.

Issuance Date July 18, 2024

# Comisión de Calidad Ambiental del Estado de Texas

**AVISO DE RECIBO DE LA SOLICITUD E INTENCION DE OBTENER UN PERMISO PARA EL SISTEMA SEPARADO MUNICIPAL DE AGUAS PLUVIALES (MS4) RENOVACION**

SOLICITUD. La ciudad de Laredo, 1110 Houston Street, Laredo, Texas 78040 y Laredo Community College, 1 West End Washington Street, Laredo, Texas 78040, han solicitado a la Comisión de Calidad Ambiental de Texas (TCEQ) renovar el Sistema de Eliminación de Descargas Contaminantes de Texas (TPDES) Permiso No. WQ0004592000 (EPA I.D. No. TXS001401) para autorizar descargas del sistema municipal separado de alcantarillado pluvial ubicado dentro de los límites corporativos de la Ciudad de Laredo, excepto tierras agrícolas, en el Condado de Webb, Texas 78040, 78041, 78042, 78043, 78044, 78045, 78046 y 78049. La ruta de descarga es desde el sistema municipal separado de alcantarillado pluvial hasta las aguas superficiales del estado. TCEQ recibió esta solicitud el 17 de abril de 2024. La solicitud de permiso estará disponible para ver y copiar en el Ayuntamiento de Laredo, 1110 Houston Street, Laredo, Texas, antes de la fecha de publicación de este aviso en el periódico. La solicitud, incluidas las actualizaciones y los avisos asociados, están disponibles electrónicamente en la siguiente página web: https://www.tceq.texas.gov/permitting/wastewater/pending-permits/tpdes-applications

**AVISO ADICIONAL.** El Director Ejecutivo de la TCEQ ha determinado que la solicitud es administrativamente completa y conducirá una revisión técnica de la solicitud. Después de completar la revisión técnica, el Director Ejecutivo puede preparar un borrador del permiso y emitirá una Decisión Preliminar sobre la solicitud. **El aviso de la solicitud y la decisión preliminar serán publicados y enviado a los que están en la lista de correo de las personas a lo largo del condado que desean recibir los avisos y los que están en la lista de correo que desean recibir avisos de esta solicitud. El aviso dará la fecha límite para someter comentarios públicos.**

**COMENTARIO PUBLICO / REUNION PUBLICA. Usted puede presentar comentarios públicos o pedir una reunión pública sobre esta solicitud.** El propósito de una reunión pública es dar la oportunidad de presentar comentarios o hacer preguntas acerca de la solicitud. La TCEQ realiza una reunión pública si el Director Ejecutivo determina que hay un grado de interés público suficiente en la solicitud o si un legislador local lo pide. Una reunión pública no es una audiencia administrativa de lo contencioso.

**OPORTUNIDAD DE UNA AUDIENCIA ADMINISTRATIVA DE LO CONTENCIOSO.** Después del plazo para presentar comentarios públicos, el Director Ejecutivo considerará todos los comentarios apropiados y preparará una respuesta a todo los comentarios públicos esenciales, pertinentes, o significativos. **A menos que la solicitud haya sido referida directamente a**

**una audiencia administrativa de lo contencioso, la respuesta a los comentarios y la decisión del Director Ejecutivo sobre la solicitud serán enviados por correo a todos los que presentaron un comentario público y a las personas que están en la lista para recibir avisos sobre esta solicitud. Si se reciben comentarios, el aviso también proveerá instrucciones para pedir una reconsideración de la decisión del Director Ejecutivo y para pedir una audiencia administrativa de lo contencioso.** Una audiencia administrativa de lo contencioso es un procedimiento legal similar a un procedimiento legal civil en un tribunal de distrito del estado.

**PARA SOLICITAR UNA AUDIENCIA DE CASO IMPUGNADO, USTED DEBE INCLUIR EN SU SOLICITUD LOS SIGUIENTES DATOS: su nombre, dirección, y número de teléfono; el nombre del solicitante y número del permiso; la ubicación y distancia de su propiedad/actividad con respecto a la instalación; una descripción específica de la forma cómo usted sería afectado adversamente por el sitio de una manera no común al público en general; una lista de todas las cuestiones de hecho en disputa que usted presente durante el período de comentarios; y la declaración "[Yo/nosotros] solicito/solicitamos una audiencia de caso impugnado". Si presenta la petición para una audiencia de caso impugnado de parte de un grupo o asociación, debe identificar una persona que representa al grupo para recibir correspondencia en el futuro; identificar el nombre y la dirección de un miembro del grupo que sería afectado adversamente por la planta o la actividad propuesta; proveer la información indicada anteriormente con respecto a la ubicación del miembro afectado y su distancia de la planta o actividad propuesta; explicar cómo y porqué el miembro sería afectado; y explicar cómo los intereses que el grupo desea proteger son pertinentes al propósito del grupo.**

**Después del cierre de todos los períodos de comentarios y de petición que aplican, el Director Ejecutivo enviará la solicitud y cualquier petición para reconsideración o para una audiencia de caso impugnado a los Comisionados de la TCEQ para su consideración durante una reunión programada de la Comisión. La Comisión sólo puede conceder una solicitud de una audiencia de caso impugnado sobre los temas que el solicitante haya presentado en sus comentarios oportunos que no fueron retirados posteriormente. Si se concede una audiencia, el tema de la audiencia estará limitado a cuestiones de hecho en disputa o cuestiones mixtas de hecho y de derecho relacionadas a intereses pertinentes y materiales de calidad del agua que se hayan presentado durante el período de comentarios.**

**Si ciertos criterios se cumplen, la TCEQ puede actuar sobre una solicitud para renovar un permiso sin proveer una oportunidad de una audiencia administrativa de lo contencioso.**

**LISTA DE CORREO.** Si somete comentarios públicos, un pedido para una audiencia administrativa de lo contencioso o una reconsideración de la decisión del Director Ejecutivo, la Oficina del Secretario Principal enviará por correo los avisos públicos en relación con la solicitud. Ademas, puede pedir que la TCEQ ponga su nombre en una or mas de las listas correos siguientes (1) la lista de correo permanente para recibir los avisos de el solicitante indicado por nombre y número del permiso específico y/o (2) la lista de correo de todas las solicitudes en un condado especifico. Si desea que se agrega su nombre en una de las listas designe cual lista(s) y envia por correo su pedido a la Oficina del Secretario Principal de la TCEQ.

**CONTACTOS E INFORMACIÓN A LA AGENCIA. Todos los comentarios públicos y solicitudes deben ser presentadas electrónicamente vía https://www14.tceq.texas.gov/epic/eComment/o por escrito dirigidos a la Comisión de Texas de Calidad Ambiental, Oficial de la Secretaría (Office of Chief Clerk), MC-105, P.O. Box 13087, Austin, Texas 78711-3087.** Tenga en cuenta que cualquier información personal que usted proporcione, incluyendo su nombre, número de teléfono, dirección de correo electrónico y dirección física pasarán a formar parte del registro público de la Agencia. Para obtener más información acerca de esta solicitud de permiso o el proceso de permisos, llame al programa de educación pública de la TCEQ, gratis, al 1-800-687-4040. Si desea información en Español, puede llamar al 1-800-687-4040.

También se puede obtener más información de la Ciudad de Laredo y en Laredo Community College en la dirección indicada anteriormente o llamando al Sr. John Porter, REM, CFM, CPM, Director Interino, Ciudad de Laredo - Departamento de Servicios Ambientales, al 956-794-1650.

Fecha de emisión 18 de julio de 2024

## Abesha Michael

**From:** Araceli Vazquez <avazquez@ci.laredo.tx.us>
**Sent:** Thursday, July 18, 2024 3:33 PM
**To:** Abesha Michael
**Cc:** Araceli Vazquez; John Porter; Leticia Benavides; Patricia Galvan
**Subject:** Application to Renew Permit No. WQ0004592000 - Notice of Deficiency Letter

Good afternoon Abesha,
The translation in Spanish is as follow:

SOLICITUD. La ciudad de Laredo, 1110 Houston Street, Laredo, Texas 78040 y Laredo Community College, 1 West End Washington Street, Laredo, Texas 78040, han solicitado a la Comisión de Calidad Ambiental de Texas (TCEQ) renovar el Sistema de Eliminación de Descargas Contaminantes de Texas (TPDES) Permiso No. WQ0004592000 (EPA I.D. No. TXS001401) para autorizar descargas del sistema municipal separado de alcantarillado pluvial ubicado dentro de los límites corporativos de la Ciudad de Laredo, excepto tierras agrícolas, en el Condado de Webb, Texas 78040, 78041, 78042, 78043, 78044 , 78045, 78046 y 78049. La ruta de descarga es desde el sistema municipal separado de alcantarillado pluvial hasta las aguas superficiales del estado. TCEQ recibió esta solicitud el 17 de abril de 2024. La solicitud de permiso estará disponible para ver y copiar en el Ayuntamiento de Laredo, 1110 Houston Street, Laredo, Texas, antes de la fecha de publicación de este aviso en el periódico. La solicitud, incluidas las actualizaciones y los avisos asociados, están disponibles electrónicamente en la siguiente página web: https://www.tceq.texas.gov/permitting/wastewater/pending-permits/tpdes-applications

También se puede obtener más información de la Ciudad de Laredo y en Laredo Community College en la dirección indicada anteriormente o llamando al Sr. John Porter, REM, CFM, CPM, Director Interino, Ciudad de Laredo - Departamento de Servicios Ambientales, al 956-794-1650 or fax 956-727-7944.

If you need additional information from us, please let us know.
Thank you very much!! AVG


Araceli Vazquez
Assistant Director
Environmental & Solid Waste Services Department
619 Reynolds Street
Laredo, TX 78040
Tel. (956) 794-1650
avazquez@ci.laredo.tx.us


**From:** Abesha Michael <Abesha.Michael@tceq.texas.gov>
**Sent:** Thursday, July 18, 2024 2:32 PM
**To:** Araceli Vazquez <avazquez@ci.laredo.tx.us>
**Subject:** FW: Application to Renew Permit No. WQ0004592000 - Notice of Deficiency Letter



Please complete and email me asap.
Thank you,

Abesha H. Michael
Applications Review & Processing Team
Water Quality Division Support Section
Water Quality Division, MC 148
PO Box 13087
Austin, Texas 78711
Phone: o: 512-239-4912; c: 346-802-8446
Email: abesha.michael@tceq.texas.gov



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**From:** Abesha Michael
**Sent:** Wednesday, June 5, 2024 10:53 AM
**To:** jporter@ci.laredo.tx.us
**Subject:** FW: Application to Renew Permit No. WQ0004592000 - Notice of Deficiency Letter

Dear Mr. Porter,

The attached Notice of Deficiency letter sent on June 5, 2024, requests additional information needed to declare the application administratively complete. Please email the Spanish notice as soon as possible.

**APPLICATION.** City of Laredo, 1110 Houston Street, Laredo, Texas 78040 and Laredo Community College, 1 West End Washington Street, Laredo, Texas 78040, have applied to the Texas Commission on Environmental Quality (TCEQ) to renew Texas Pollutant Discharge Elimination System (TPDES) Permit No. WQ0004592000 (EPA I.D. No. TXS001401) to authorize discharges from the municipal separate storm sewer system located within the corporate boundary of the City of Laredo, except agricultural lands, in Webb County, Texas 78040, 78041, 78042, 78043, 78044, 78045, 78046, and 78049. The discharge route is from the municipal separate storm sewer system to the surface water in the State. TCEQ received this application on April 17, 2024. The permit application will be available for viewing and copying at Laredo City Hall, 1110 Houston Street, Laredo, Texas prior to the date this notice is published in the newspaper. The application, including any updates, and associated notices are available electronically at the following webpage: https://www.tceq.texas.gov/permitting/wastewater/pending-permits/tpdes-applications

Further information may also be obtained from City of Laredo and Laredo Community College at the address stated above or by calling Mr. John Porter, REM, CFM, CPM, Acting Director, City of Laredo - Environmental Services Department, at 956-727-7944.

Thank you,

Abesha H. Michael
Applications Review & Processing Team
Water Quality Division Support Section
Water Quality Division, MC 148
PO Box 13087
Austin, Texas 78711
Phone: o: 512-239-4912; c: 346-802-8446
Email: abesha.michael@tceq.texas.gov

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# Application for Renewal

# for the City of Laredo

# and Laredo College

## TPDES Phase I MS4 Permit

## TPDES Permit No. WQ0004592000

## City of Laredo, Webb County, Texas

## RN103014353

## April 17, 2024


Hand Delivered

# APPLICATION FOR PERMIT TO DISCHARGE FROM A LARGE OR MEDIUM (PHASE 1) MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) INTO SURFACE WATER IN THE STATE

## A. Application fee payment

Did you know you can pay the application fee online?

(a) Go to https://www3.tceq.texas.gov/epay/

(b) Select Fee Type: Individual Permit, MS4 Permit - Phase I

(c) Select Application Type: New, Major Amendment, Minor Amendment (without renewal) or Renewal

The application fee for new, major amendment and renewal applications of the TPDES permit for this activity is $2,000.00.

The application fee for minor amendment (without renewal of the permit term) of the TPDES permit for this activity is $100.00

For new and major applications an additional fee of $50.00 is required to be applied toward the cost of providing public notice. For renewal applications the fee is $15.00.

You can also send the application fee by regular mail. A check or money order should then be made payable to the Texas Commission on Environmental Quality and must be sent under separate cover to:

Texas Commission on Environmental Quality
Cashier's Office (MC 214)
P.O. Box 13088
Austin, Texas 78711-3088

## B. Permittee (applicant)

(a) If the applicant is currently a customer with TCEQ, provide the Customer Number (CN)? Search for your CN at: http://www12.tceq.state.tx.us/crpub/index.cfm?fuseaction=cust.CustSearch

CN: 600131908

(b) Provide the Legal Name of the entity (applicant) applying for this permit:

City of Laredo

(c) Provide the name and title of the person signing the application:

(The person must be an executive official meeting signatory requirements in TAC §305.44(a).)

Prefix: Mr.
(e.g, Mr., Ms., Miss)
First/Last Name: Joseph Neeb
Suffix:
Title: City Manager
Credential: See Attachment 5

(d) Provide the applicant's mailing address as recognized by the US Postal Service: You may verify the address at: http://zip4.usps.com/zip4/welcome.jsp

Street Address or P.O. Box: 1110 Houston Street
Internal Routing (Mail Code, Etc.):_____
City: Laredo
State: TX
ZIP Code: 78040

Electronic Contact Information:
Phone No.: (956) 791-7302
Extension:_____
Fax No.: (956) 791-7498
E-mail Address: jneeb@ci.laredo.tx.us

(e) Indicate the type of Customer:

~~Federal Government~~
~~State Government~~
~~County Government~~
[X] City Government
~~Other Government, Explain~~:
_____

(f) Number of Employees:

0-20; 21-100; 101-250; 251-500; or 501 or higher

**C. Co-applicants(s)**

**Note: This section may be copied and attached to the application if there are additional co-applicants. Indicate if there are additional co-applicants:**

Yes No

Laredo College is the only co-applicant. In previous permitting cycles, Laredo College was known as Laredo Community College.

(a) If the co- applicant is currently a customer with TCEQ, provide the Customer Number (CN)? Search for your CN at http://www12.tceq.state.tx.us/crpub/index.cfm?fuseaction=cust.CustSearch

CN: 601429350

(b) Provide the Legal Name of the entity (applicant) applying for this permit: Laredo College

(c) Provide the name and title of the person signing the application: (The person must be an executive official meeting signatory requirements in TAC §305.44(a).)

Prefix: Mr.
(e.g, Mr., Ms., Miss)
First/Last Name: Cesar Vela
Suffix:
Title: Vice President of Finance and Administration
Credential: See Attachment 5

(d) Provide the applicant's mailing address as recognized by the US Postal Service:

You may verify the address at: http://zip4.usps.com/zip4/welcome.jsp

Street Address or P.O. Box: West End Washington Street
Internal Routing (Mail Code, Etc.): Elpha Lee West Building, Room 122, Fort McIntosh Campus
City: Laredo
State: TX
ZIP Code: 78040

Electronic Contact Information:
Phone No.: (956) 721-5142
Extension:
Fax No.:
E-mail Address: cvela@laredo.edu

(e) Indicate the type of Customer:

~~Federal Government~~
~~State Government~~
~~County Government~~
~~City Government~~
[X] Other Government, Explain Community College

(f) Number of Employees:

0-20; 21-100; 101-250; 251-500; or 501 or higher

## D. Billing Address

The operator is responsible for paying the annual fee. The annual fee will be assessed to permits active on September 1 of each year. TCEQ will send a bill to the address provided in this section. The operator is responsible for terminating the permit when it is no longer needed.

(a) Is the billing address the same for the permittee or co-permittee(s)?

Yes No

If the answer is No, please indicate the billing address for each party responsible to receive billing.

Prefix: Mr.
(e.g., Mr., Ms., Miss)
First/Last Name: Suffix: John Porter, CFM, CPM, REM
Title: Director

Credential: _____
Organization Name: Environmental & Solid Waste Services Department, City of Laredo

Street Address or P.O. Box: 619 Reynold Street
Internal Routing (Mail Code, Etc.): _____
City: Laredo
State: TX
ZIP: 78040

Electronic Contact Information:
Phone No.: (956) 794-1650
Extension:_____
Fax No: (956) 727-7944
Email address: jporter@ci.laredo.tx.us

**E. Regulated Entity (RE) information on project or site**

(a) Has TCEQ issued a Regulated Entity Reference Number (RN) for the regulated MS4?

(Yes) Provide the RN? RN: 103014353
No TCEQ will assign the RN number after the application is submitted

(b) Provide the name that is used to identify the MS4 (Regulated Entity):
City of Laredo MS4

(Example: City of xxx MS4)

(c) Provide the name of the county where the largest residential population exists within the regulated MS4 boundaries? Webb County

(d) Provide the latitude and longitude of the approximate center of the regulated MS4?

Latitude: N 27.554969

Longitude: W 99.483795

(e) In your own words, briefly describe the primary business of the Regulated Entity (Do not write the SIC and NAICS code description.);
See Attachment 5

**F. Application contact**

(a) If TCEQ needs additional information regarding this application, who should be contacted?

Prefix: Mr. (e.g., Mr., Ms., Miss)
First/Last Name: John Porter, CFM, CPM, REM
Suffix: _____
Title: Director
Credential:_____

Organization Name: Environmental & Solid Waste Services Department, City of Laredo

Street Address or P.O. Box: 619 Reynolds Street
Internal Routing (Mail Code, Etc.):
City: Laredo
State: TX
ZIP: 78040

Electronic Contact Information:
Phone No.: (956) 794-1650
Extension:
Fax No.: (956) 727-7944
Email address: jporter@ci.laredo.tx.us

**G. Application contact (technical)**

(a) If TCEQ needs additional technical information to this application, who should be contacted? The person must be familiar with the MS4 and the requirements of any previously issued storm water discharge permit.

Prefix: Mr. (e.g., Mr., Ms., Miss)
First/Last Name: John Porter, CFM, CPM, REM
Suffix:
Title: Director
Credential:
Organization Name: Environmental & Solid Waste Services Department, City of Laredo

Street Address or P.O. Box: 619 Reynolds Street
Internal Routing (Mail Code, Etc.):
City: Laredo
State: TX
ZIP: 78040

Electronic Contact Information:
Phone No.: (956) 794-1650
Extension:
Fax No.: (956) 727-7944
Email address: jporter@ci.laredo.tx.us

**H. DMR contact**

(a) Contact Responsible for Discharge Monitoring Report (DMR) forms (EPA 3320-1). Provide the name of the person and their complete mailing address delegated to receive and submit DMR Forms.

Prefix: Mr. (e.g., Mr., Ms., Miss)
First/Last Name: John Porter, CFM, CPM, REM
Suffix:
Title: Director
Credential:
Organization Name: Environmental & Solid Waste Services Department, City of Laredo

Street Address or P.O. Box: 619 Reynolds Street
Internal Routing (Mail Code, Etc.):_____
City: Laredo

State: TX
ZIP: 78040

Electronic Contact Information:
Phone No.: (956) 794-1650
Extension: _____
Fax No.: (956) 727-7944
Email address: jporter@ci.laredo.tx.us

## I. Public participation

(a) Public notice contact:

Provide the name of the person that will be identified as the notice contact in the two notices that are mailed out and published as part of the permitting process? The person may be contacted by the public to answer general and specific questions about all aspects of the permit application. If the mailing address is a P.O. Box, insert the P.O. Box number within the space provided for the address.

Prefix: Mr. (e.g., Mr., Ms., Miss)
First/Last Name: John Porter, CFM, CPM, REM
Suffix: _____
Title: Director
Credential:_____
Organization Name: Environmental & Solid Waste Services Department, City of Laredo

Street Address or P.O. Box: 619 Reynolds Street
Internal Routing (Mail Code, Etc.):_____
City: Laredo
State: TX
ZIP: 78040

Electronic Contact Information:_____
Phone No.: (956) 794-1650
Extension: _____
Fax No.: (956) 727-7944
Email address: jporter@ci.laredo.tx.us

(b) Application Viewing Information:

Provide the name and location of the public location where copies of the application and storm water management program (SWMP), as well as the draft permit and fact sheet, may be viewed?

Name of Public Place: City Hall
Street Address: 1110 Houston Street
City: Laredo
County: Webb

State: TX
ZIP code: 78040

Preferred method for receiving public notice package(s) and instructions to publish:

[X] E-mail: E-mail address jporter@ci.laredo.tx.us
Fax: Fax number: _____
Overnight/Priority mail: (self addressed, prepaid envelope required)
Regular Mail:
Street Address:_____
City: _____
County:_____
State:_____
ZIP code: _____

(c) Bilingual Notice Requirements:

Bilingual notice may be required for new permit applications, major amendment applications and renewal applications, (not applicable for minor amendment or minor modification applications). If an elementary school or middle school within the regulated area of the MS4 offers a bilingual program, notice may be required to be published in an alternative language. The Texas Education Code, upon which the TCEQ alternative language notice requirements are based, triggers a bilingual education program to apply to an entire school district should the requisite alternative language speaking student population exist. However, there may not be any bilingual-speaking students at a particular school within a district which is required to offer the bilingual education program. For this reason, the requirement to publish notice in an alternative language is triggered if any elementary or middle school within the MS4 area, as a part of a larger school district, is required to make a bilingual education program available to qualifying students and the school either has students enrolled at such a program on-site, or has students who attend such a program at another location in satisfaction of the school's obligation to provide such a program as a member of a triggered district.

If it is determined that a bilingual notice is required, the applicant is responsible for ensuring that the publication in the alternate language is complete and accurate in that language.

FOR NEW PERMIT APPLICATIONS, MAJOR AMENDMENT AND RENEWAL APPLICATIONS (Not applicable for minor amendment or minor modification applications.):

1. Is a bilingual program required by the Texas Education Code in any school district where the MS4 is located?

   (Yes) No (If No, alternative language notice publication is not required; skip to item 4.)

2. If Yes to question 1, are students enrolled in a bilingual education program at any elementary school or the middle school within the regulated area of the MS4?

   ( )

Yes No (If Yes to questions 1 and 2, alternative language publication is required; If No to question 2, then consider the next question.)

3. If Yes to question 1, are there students enrolled at either the elementary school or the middle school located within the regulated area of the MS4 who attend a bilingual education program at another location? N/A

   Yes No (If Yes to questions 1 and 3, alternative language publication is required; If No to question 3, then consider the next question.)

4. If Yes to question 1, would either the elementary school or the middle school located within the regulated area of the MS4 be required to provide a bilingual education program but for the fact that it secured a waiver from this requirement, as available under 19 TAC §89.1205(g)? N/A

   Yes No (If Yes to questions 1 and 4, alternative language publication is required; If No to question 4, alternative language notice publication not required.)

5. If a bilingual education program(s) is provided by either the elementary school or the middle school located within the regulated area of the MS4, which language(s) is required by the bilingual program? Spanish

(d) Public Involvement Plan

Complete the Public Involvement Plan Form (TCEQ Form 20960) for each application for a new permit or major amendment to a permit and include as an attachment N/A

(e) List each person employed by the State of Texas who represented you and was paid for services regarding this application. NOTE: Any violation of §382.0591 of the Health and Safety Code, §26.0283 of the Water Code, or §572.054 of the Government Code, relating to conflict of interest, may result in denial of the application or filing of charges with the appropriate office. N/A

**J. MS4 System Information**

(a) Application is for the following MS4(s): City of Laredo MS4

(b) The MS4(s) is located in the following county/counties: Webb

If the MS4 is located in Bexar, Comal, Hays, Kinney, Medina, Travis, Uvalde or Williamson County, is the MS4, or a portion of the MS4, located in an area that is subject to TCEQ rules at 30 TAC Chapter 213, related to the Edwards Aquifer?

Yes (No)

(c) ZIP codes located within the MS4: 78040, 78041, 78042, 78043, 78044, 78045, 78046, and 78049

(d) The MS4(s) is located in or is nearest to the following city: Laredo

(e) For an existing MS4: Is the location described on page one (1) of the existing TPDES permit correct?

(Yes) No N/A – this is a new permit

If No, provide a more accurate description in item (f) below.

(f) For a new permit: Give a **written location description** of the MS4 (plant) with respect to known or easily identifiable landmarks which can be found on the map provided with the application. N/A

Is the MS4 located on Indian Land?

Yes (No)

(g) If the State of Texas is a landowner adjacent to the MS4, your application may affect lands dedicated to the permanent school fund. Refer to Texas Water Code §5.115. To determine whether lands dedicated to the permanent school fund are affected, you may submit a request which includes the property location to the General Land Office at the following address:

GENERAL LAND OFFICE
DEPUTY COMMISSIONER OF ASSET MANAGEMENT
STEPHEN F AUSTIN BLDG, RM 840
1700 N CONGRESS
AUSTIN TX 78701- 1495

If it is determined that your application may affect lands dedicated to the permanent school fund, your application must include the following information:

1. State the location of the permanent school fund land to be affected. N/A. See Attachment 6
2. Describe any foreseeable impact or effect of the proposed permitted action on permanent school fund land. N/A. See Attachment 6

## K. Permit Information

(a) Existing TPDES MS4 permit number: WQ0004592000

(b) TPDES permit expiration date: October 15, 2024

(c) Type of permit for which application is submitted (check one):

☐ New TPDES Individual Permit (Original, unpermitted)

☐ Major Amendment of a TPDES MS4 permit (Renewing the permit term.)

☒ Renewal of existing TPDES MS4 permit (With no changes or with minor changes.)

☐ Minor Modification of a TPDES Permit (Retain current expiration date.)

☐ Minor Amendment to a TPDES Permit (Retain current expiration date. Application requirements are limited to those items that relate to the proposed modification. See application instructions to determine if proposed changes can be made through a minor amendment.)

(d) Are there any modifications or changes from conditions of the current permit that are requested for consideration during the processing of this application for a TPDES MS4 permit?

(Yes) No

If the application is for a major amendment (with or without renewal) or minor amendment without renewal, a minor modification, or a renewal with minor changes, briefly list the proposed changes requested in the amendment. **A major amendment includes, but is not limited to, any change that makes a monitoring requirement less stringent, removal of a monitoring requirement, major changes in sampling protocol related to outfalls monitored in the permit, etc.**

Applicants are encouraged to consider modifications or changes to the existing Storm Water Management Program (SWMP), during application for a TPDES permit, that would either more effectively control the discharge of pollution or more accurately monitor the effectiveness of the plan. Modifications and changes may be based on new data, water quality impacts from storm water discharges, past monitoring of discharges, and other similar considerations. Elements of the current plan may be strengthened, updated, replaced by new elements, or de-emphasized and even deleted, when appropriate. Provide a brief outline or list of any proposed changes (an in-depth discussion of proposed changes is required as a part of ATTACHMENT 1 to this application). **Attach additional pages if necessary.** See Attachment 5

(e) List any other permits, existing or pending, that are held by the applicant and/or co-applicant(s) and that pertain to pollution control. Provide the permit/registration number and a short description of the activity (ex. ##01234 City of Hope Municipal Solid Waste Landfill). If the applicant or co-applicants hold a significant number of permits, it would be appropriate to list only the water quality permits. If needed, attach a separate page(s) with additional permit numbers.

| Permit Number | Permittee Name | Permit type |
|---|---|---|
| See Attachment 7 | | |

If the above list includes only water quality permits, please provide a general description below of the number of additional permits held by permit type (e.g., the number of water rights permits):

| Permit Number | Permittee Name | Permit type |
|---|---|---|
| See Attachment 7 | | |

## L. Implementation and Compliance with the Current TPDES Permit

Have all schedules of the current permit, relating to implementation and compliance with the Storm Water Management Program (SWMP), been met?

Yes (No)

If the answer is no, provide a summary description of the current permit requirement/schedule that has not been met, cause for non-attainment, compliance schedule, and current efforts to complete this activity
See Attachment 5

## M. Discharge Information and Receiving Water Bodies

(a) For a currently permitted discharge into a watercourse:

Are the point(s) of discharge and discharge route description the same as described on page one (1) of the current permit?

(Yes) No

If no, provide a more accurate description below. If the point(s) of discharge has (have) changed or a new outfall is proposed that would change the discharge route description, an application for a major amendment may be required. N/A

(b) Item b. is required for NEW permit applications:

For a proposed discharge into a watercourse: Provide a written description of the discharge route from each MS4 outfall to the nearest major watercourse. (For example: "From the MS4 through a weir to an unnamed tributary to Doe Creek, to Doe Creek, then to the Bravos River."). N/A

(c) Item c. is required for ALL permit applications.

List any water bodies that will receive storm water discharges during the term of the requested TPDES permit that were not previously identified in the application for the current TPDES MS4 permit. Also, provide a description of any known water quality problems for these additional receiving waters. Known water quality problems include both measured and unmeasured (or simply observed) problems.

None

## N. Plain Language Summary

Complete the plain language summary template below.

**Plain Language Summary Template and Instructions for Texas Pollutant Discharge Elimination System (TPDES) Phase I MS4 Permit Applications**

This template is a guide to assist applicant's in developing a plain language summary as required by 30 Texas Administrative Code Chapter 39 Subchapter H. Applicant's may modify the template as necessary to accurately describe their facility as long as the summary includes the following information: (1) the function of the proposed plant or facility; (2) the expected output of the proposed plant or facility; (3) the expected pollutants that may be emitted or discharged by the proposed plant or facility; and (4) how the applicant will control those pollutants, so that the proposed plant will not have an adverse impact on human health or the environment.

Fill in the blanks below to describe your facility and application. Instructions and examples are provided below. Make any other edits necessary to improve readability or grammar and to comply with the rule requirements.

If you are subject to the alternative language notice requirements in 30 Texas Administrative Code §39.426, **you must provide a translated copy of the completed plain language summary in the appropriate alternative language as part of your application package**. Note: You identified your alternative language requirements above in section I.(c) of this application. For your convenience, a Spanish template has been provided below. **Attach additional pages if necessary.**

**English Template for TPDES New/Renewal/Amendment Applications**

**Phase I MS4 Stormwater**

*The following summary is provided for this pending water quality permit application being reviewed by the Texas Commission on Environmental Quality as required by 30 Texas Administrative Code Chapter 39. The information provided in this summary may change during the technical review of the application and are not federal enforceable representations of the permit application.*

The City of Laredo, CN600131908, and its co-applicant Laredo College, CN601429350, operate the City of Laredo MS4, RN103014353, a municipal separate storm sewer system owned and operated by the applicants through which stormwater from all areas, except for agricultural lands, located within the City of Laredo are discharged to various ditches and tributaries that eventually reach Rio Grande Below Amistad Reservoir in Segment Number 2304 of the Rio Grande Basin. The MS4 is located in the City of Laredo, Webb County, Texas, 78040, 78041, 78042, 78043, 78044, 78045, 78046, and 78049.

The City of Laredo and LCC are seeking a renewal of existing TPDES Permit No. WQ0004592000.

Discharges from the MS4 are expected to contain stormwater from all areas of the City of Laredo, except agricultural land. Stormwater discharges from the City of Laredo MS4 are managed in accordance with TPDES Permit No. WQ0004592000 and the TCEQ-approved Storm Water Management Programs.

**PLANTILLA EN ESPAÑOL PARA SOLICITUDES NUEVAS/RENOVACIONES/ENMIENDAS DE TPDES FASE I MS4 AGUAS PLUVIALES**

*El siguiente resumen se proporciona para esta solicitud de permiso de calidad del agua pendiente que está siendo revisada por la Comisión de Calidad Ambiental de Texas según lo requerido por el Capítulo 39 del Código Administrativo de Texas 30. La información proporcionada en este resumen puede cambiar durante la revisión técnica de la solicitud y no son representaciones federales exigibles de la solicitud de permiso.*

La Ciudad de Laredo, CN600131908, y su co-solicitante Laredo College, CN601429350, operan la Ciudad de Laredo MS4, RN103014353, un sistema municipal separado de alcantarillado pluvial propiedad y operado por los solicitantes a través del cual fluyen las aguas pluviales de todas las áreas, excepto las tierras agrícolas. , ubicados dentro de la Ciudad de Laredo, se descargan en varias zanjas y afluentes que eventualmente llegan al Río Grande Debajo del Embalse Amistad en el Segmento Número 2304 de la Cuenca del Río Grande. La MS4 está ubicada en la ciudad de Laredo, condado de Webb, Texas, 78040, 78041, 78042, 78043, 78044, 78045, 78046 y 78049.

La Ciudad de Laredo y LC están buscando una renovación del Permiso TPDES No. WQ0004592000 existente.

Se espera que las descargas de la MS4 contengan aguas pluviales de todas las áreas de la ciudad de Laredo, excepto las tierras agrícolas. Las descargas de aguas pluviales de la ciudad de Laredo MS4 se gestionan de acuerdo con el permiso TPDES n.º WQ0004592000 y los programas de gestión de aguas pluviales aprobados por la TCEQ.

## O. Required Attachments

Provide the following attachments to the application:

(a) Attachment 1

Provide an in-depth description of all proposed modifications to the Storm Water Management Program (SWMP) or existing TPDES permit requirements for both the permittee and co-permittees. Provide rationale, based on findings collected during the previous TPDES permit term or from other sources, to support the proposed modifications.

(b) Attachment 2

Provide an original USGS topographic quadrangle map, or a similar topographic map with a scale between 1:10,000 and 1:24,000, which clearly delineates the following information. If the regulated area is too large to include on only one map, the applicant may use a different scale as appropriate.

(1) The location and boundaries of the MS4, including an area extending at least one (1) mile beyond the service boundaries of the MS4;

(2) all point(s) of discharge from the MS4;

(3) a delineation of the discharge route that begins at the MS4 outfalls that are part of the Wet Weather Characterization Program (001, 002, etc.) and traced with a highlighter for a distance of three (3) stream miles or to the point that the discharge reaches a classified segment listed in 30 TAC, Chapter 307, Appendix A, (Note: Do not mark with dark ink over the discharge route. A new original map will be required if the discharge route is not visible.);

(4) a description of the land use activities, including estimations of population density and projected growth for a ten (10)-year period within the MS4 drainage area;

(5) the location and a description of the activities of each currently operating or closed municipal landfill or the treatment, storage or disposal facility for municipal waste;

(6) the location of major structural controls for storm water discharge, including detention/retention ponds, major infiltration devices, etc.; and

(7) the identification of publicly owned parks, recreational areas, and other open lands.

For very large MS4 areas, these map requirements may be revised upon approval of the TCEQ Wastewater Permitting Section.

(c) Attachment 3

Provide a copy of the current SWMP, a description of monitoring and screening programs, and a summary of monitoring results for the previous year.

(d) Attachment 4

Review the most recent annual report and the SWMP and provide a brief description (1 to 2 paragraphs) of how all program elements have been implemented to meet the requirements in the existing permit. If the permit has several permittees, please provide a description of how each permittee meets the program requirements.

Address the program elements listed below:

(1) MCM 1, MS4 Maintenance Activities.

a. Structural Controls. The existing permit requires that the permittee(s) operate the MS4 and any stormwater structural controls associated with the MS4 in a manner to reduce the discharge of pollutants to the Maximum Extent Practicable (MEP).

b. Floatables. The existing permit requires the permittee(s) to reduce the discharge of floatables, such as litter and other human generated solid refuse, into the MS4.

c. Roadways. The existing permit requires the permittee(s) operate and maintain public streets, roads, and highways in a manner to minimize discharge of pollutants, including pollutants related to deicing or sanding activities.

(2) MCM 2, Post–Construction Stormwater Control Measures.

a. The existing permit requires the permittee(s) to continue implementation and enforcement of the controls to minimize the discharge of pollutants from areas of new development and significant redevelopment after construction is completed.

b. The existing permit requires that the comprehensive master planning process (or equivalent) must be expanded to include all new development and redevelopment projects that disturb one acre or more of land, including projects less than one acre that are part of a larger common plan of development or sale that will result in the disturbance of one acre or more.

c. The existing permit requires the permittee(s) to evaluate the existing SWMP(s) as necessary to ensure that this MCM includes a regulatory mechanism, such as an ordinance, to implement and enforce the new requirements of this program and shall ensure that the SWMP includes strategies for structural and non-structural controls (i.e., BMPs) appropriate for the community. In addition, the permittee(s) shall provide for adequate long-term operation and maintenance of BMPs.

d. The existing permit requires the permittee(s) to assess the impacts on the receiving water(s) for all flood control projects. Where feasible, new flood control structures must be designed, constructed, and maintained to provide erosion prevention and pollutant removal from stormwater. If applicable, the retrofitting of existing structural flood control devices to provide additional pollutant removal from stormwater shall be implemented to the MEP.

(3) MCM 3, Illicit Discharge Detection and Elimination.

a. The existing permit requires the permittee(s) implement an ongoing program to detect and eliminate illicit discharges and improper disposal into the MS4.

b. The existing permit requires the permittee(s) to identify all categories of miscellaneous, non-stormwater discharges that may be discharged into the MS4, and include a description of any local controls or conditions placed on discharges exempted from the prohibition on non-stormwater.

c. The existing permit requires the permittee(s) to address discharges or flows from firefighting only where such discharges or flows are identified as significant sources of pollutants.

d. The existing permit requires the permittee(s) to prohibit any individual non-stormwater discharge otherwise exempted under this paragraph from the prohibition on non-stormwater that is determined by the permittee(s) to be contributing significant amounts of pollutants to the MS4.

e. Elimination of Illicit Discharges and Improper Disposal. The existing permit requires the operator of an illicit discharge or improper disposal practice to eliminate the illicit discharge or stop the improper disposal practice as quickly as reasonably possible. If the elimination of an illicit discharge within 30 days is not possible, the permittee(s) shall require the operator of the illicit discharge to remove the discharge according to an expeditious schedule. Until the illicit discharge or improper disposal is eliminated the permittee(s) shall require the operator of the illicit discharge to take all reasonable measures to minimize the discharge of pollutants to the MS4.

f. Overflows and Infiltration. The existing permit requires the permittee(s) to implement controls where necessary and feasible to prevent dry weather and wet weather overflows from sanitary sewers into the MS4. The permittee(s) shall continue to limit the infiltration of seepage from municipal sanitary sewers into the MS4.

g. Household Hazardous Waste and Used Motor Vehicle Fluids. The existing permit prohibits the discharge or disposal of used motor vehicle fluids and household hazardous wastes, and the intentional disposal of collected quantities of grass clippings, leaf litter, and animal wastes into the MS4.

h. MS4 Screening and Illicit Discharge Inspections. The existing permit requires the permittee(s) to continue implementation of the Dry Weather Screening Program described in Part III, Section B.2.h.i. of the permit. Follow-up activities to eliminate illicit discharges and improper disposals may be prioritized on the basis of magnitude and the nature of the suspected discharge, sensitivity of the receiving water, or other relevant factors. The entire MS4, but not necessarily each individual outfall, shall continue to be screened at least once per five years.

i. Priority Areas. The existing permit requires the permittee(s) to develop a list of priority areas likely to have illicit discharges. The permittee(s) shall continue to evaluate and update this list each year and report the results in the annual report.

j. NPDES and TPDES Permittee List. The existing permit requires the permittee(s) to maintain an updated list of dischargers that discharge directly to the MS4 and that have been issued an NPDES or a TPDES permit. The list shall include the name, location, and permit number (if known) of the discharger.

k. MS4 Map. The existing permit requires the permittee(s) to maintain a current, accurate MS4 map of the location of all MS4 outfalls; the names and locations of all waters of the U.S. that receive discharges from the outfalls; and any additional information needed by the permittee(s) to implement its(their) SWMP. Where possible, the permitee(s) shall use the Global Positioning System (GPS) to locate outfalls and photographs for

documenting baseline conditions. The permittee(s) shall document the source information used to develop the MS4 map, including how the outfalls are verified and how the map will be regularly updated.

l. Spill Prevention and Response. The existing permit requires the permittee(s) to implement existing programs which prevent, contain, and respond to spills that may discharge into the MS4.

(4) MCM 4, Pollution Prevention and Good Housekeeping for Municipal Operations.

a. Pollution Prevention and Good Housekeeping program. The existing permit requires the permittee(s) to implement a pollution prevention and good housekeeping program for municipal operations.

b. Waste Handling. The existing permit requires the permittee(s) to ensure that waste removed from the MS4 or other municipal operations is properly disposed of.

c. Pesticide, Herbicide, and Fertilizer Application. The existing permit requires the permittee(s) to continue to implement controls to reduce the discharge of pollutants related to the storage and application of pesticides, herbicides, and fertilizers, by the (permittee's/permittees') employees or contractors, to public rights-of-way, parks, or other municipal property. The permittee(s), if it/they have jurisdiction over lands it/they do not directly own (e.g. incorporated city), shall implement programs to reduce the discharge of pollutants related to the commercial application and distribution of pesticides, herbicides, and fertilizers on those lands.

d. List of Municipal Facilities. The existing permit requires that the SWMP must include a list of all municipal operations subject to the municipal operation, maintenance, and training programs listed under this MCM and all municipally owned and operated industrial activities subject to TPDES or NPDES industrial stormwater regulations.

(5) MCM 5, Industrial and High Risk Runoff.

a. The existing permit requires the permittee(s) to continue to improve (its/their) existing programs to identify and control pollutants in stormwater discharges to the MS4 from: municipal landfills; other treatment, storage, or disposal facilities for municipal waste (e.g., transfer stations, incinerators, etc.); hazardous waste treatment, storage, disposal and recovery facilities; facilities that are subject to Emergency Planning and Community Right-to-Know Act (EPCRA) Title III, Section 313; and any other industrial or commercial discharge the permittee(s) determine(s) is/are contributing a substantial pollutant loading to the MS4.

b. The program must include: priorities and procedures for inspections and for establishing and implementing control measures for such discharges; and an Industrial and High Risk Monitoring Program as described in Part III, Section B.2.h.iii. of the permit.

(6) MCM 6, Construction Site Stormwater Runoff.

a. The existing permit requires the permittee(s) to continue to implement a program to reduce the discharge of pollutants into the MS4 from construction sites. This MCM must include an ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under State or local law. The permittee(s) shall ensure that the existing program is revised as necessary to address construction projects that result in a land disturbance of one acre or more, including activities disturbing less that one acre that are part of a larger common plan of development or sale that would disturb one acre or more.

b. The program must include the following:

- requirements to use and maintain appropriate erosion and sediment control BMPs to reduce pollutants discharged to the MS4 from construction sites;
- requirements for construction site operators to address the control of site waste, such as discarded building materials, concrete truck washout water, chemicals, litter, and sanitary waste;
- requirements for inspections of construction sites and enforcement of control measure requirements;
- requirements for the permittee(s) to provide appropriate education and training measures to construction site operators;
- notifications to construction site operators of their potential responsibilities under the NPDES or TPDES permitting regulations and permits for construction site runoff;
- procedures for site plan review that incorporate consideration of potential water quality impacts;
- procedures for receiving and considering input received from the public.
- a description of a program to implement and maintain structural and non-structural BMPs to reduce pollutants in stormwater runoff from construction sites to the MS4, which must include a description of the following:
- procedures for site planning which incorporate consideration of potential water quality impacts;
- requirements for nonstructural and structural best management practices;
- procedures for identifying priorities for inspecting sites and enforcing control measures that consider the nature of the construction activity, topography, and the characteristics of soils and receiving water quality; and

- appropriate educational and training measures for construction site operators.

c. Lists of Sites. The existing permit requires the permittee(s) to maintain a current list of construction sites that discharge directly to the MS4 and that have been issued an NPDES or TPDES permit. The list must include the name, location and permit number of the discharges that have been authorized under an NPDES or TPDES stormwater discharges permit for construction activities (if known).

d. The existing permit requires the permittee(s) to ensure and demonstrate that the program includes the following elements, in addition to those listed above:

- The permittee(s) shall require construction site contractors to implement appropriate erosion and sediment control BMPs and control waste (for example, discarded building materials, concrete truck washout water, chemicals, litter, and sanitary waste) at the construction site that may cause adverse impacts to water quality.

- The permittee(s) shall develop procedures for site plan reviews that incorporate consideration of potential water quality impacts, receipt and consideration of information submitted by the public, and site inspections and enforcement of control measures to the extent allowable under state and local law.

(7) MCM 7, Public Education, Outreach, Involvement and Participation.

a. Public Education and Outreach

- The existing permit requires that the permittee(s) shall document and ensure that the SWMP promotes, publicizes, and facilitates public education and outreach to residents, visitors, public service employees, businesses, commercial and industrial facilities, and construction site personnel and provide justification for any group that is not addressed by the program The permittee(s) shall document the activities conducted and materials used to fulfill this program element and provide enough detail to demonstrate the amount of educational and outreach resources and materials used to address each group.

- The existing permit requires the permittee(s) to continue to implement a public education and outreach program component to promote, publicize, and facilitate:

- public reporting of illicit discharges or improper disposal of materials, including floatables, into the MS4;

- the proper management and disposal of used oil and household hazardous wastes; and

- the proper use, application, and disposal of pesticides, herbicides, and fertilizers by public, commercial, and private applicators and distributors.

b. Public Involvement and Participation. The existing permit requires the permittee(s) to develop and implement a public involvement and participation program which complies with State, Tribal, and local public notice requirements. This program element must include opportunities for a wide variety of constituents within the MS4 area to participate in the SWMP development and implementation.

(8) MCM 8, Monitoring, Evaluating and Reporting. The existing permit requires the permittee(s) to continue to implement, and modify as necessary, the following monitoring or screening programs for dry weather, wet weather, and industrial and high-risk runoff:

a. Dry Weather Screening Program. This program shall continue the permittee(s)' efforts to detect the presence of illicit connections and improper discharges to the MS4. All areas of the MS4 must be screened at least once during the permit term. The permittee(s) may utilize modified screening methods based on experience gained during previous field screening activities; the screening methods are not required to conform to the protocol in 40 CFR § 122.26(d)(1)(iv)(D). Sample collection and analysis is not required to conform to the requirements of Part V, Section B.2. of the permit, "Test Procedures;" however, samples taken to confirm (e.g., in support of possible legal action) a particular illicit connection or improper disposal practice must conform to the requirements of Part V, Section B.2. of the permit, "Test Procedures."

b. Wet Weather Screening Program: The existing permit requires the permittee(s) to identify, investigate, and address areas within their jurisdiction that may be contributing excessive levels of pollutants to the MS4.

The wet weather screening program shall:

- screen the MS4, as specified in the SWMP; and
- specify the sampling and non-sampling techniques to be used for current screening and also for follow-up screening.

Sample collection and analysis for the Wet Weather Screening Program is not required to conform to the requirements of Part V, Section B.2. of the permit, "Test Procedures;" however, samples taken to confirm (e.g., in support of possible legal action) a particular illicit connection or improper disposal practice must conform to the requirements of Part V.B.2. of the permit, "Test Procedures."

c. Industrial and High Risk Runoff Monitoring Program.

- The existing permit states that this program must include monitoring for pollutants in stormwater discharges to the MS4

from municipal landfills; other treatment, storage, or disposal facilities for municipal waste (e.g., transfer stations, incinerators, etc.); hazardous waste treatment, storage, disposal and recovery facilities; facilities that are subject to EPCRA Title III, Section 313; and any other industrial or commercial discharge the permittee(s) determine(s) is/are contributing a substantial pollutant loading to the MS4.

- The Industrial and High-Risk Runoff Monitoring Program must include the collection of quantitative data on parameters which have been identified by the permittee(s) as a pollutant of concern for that facility and shall:
    - coincide with the corresponding industrial sector-specific requirements of the TPDES Multi-Sector General Permit No. TXR050000 or any applicable general permit issued after September 29, 1995, and is not contingent on whether a particular facility is actually covered by the general permit;
    - coincide with the monitoring requirements of any individual permit for the stormwater discharges from that facility; and
    - include pollutants of concern for the stormwater discharge from that facility as identified by the permittee(s).
- To avoid the duplication of efforts, the permittee(s) may review data collected by a facility as required by any individual or general permit for that facility rather than performing additional sample collection and analysis.
- In lieu of the monitoring discussed above, the permittee(s) may accept a certification from a facility that raw and waste materials, final and intermediate products, by-products, material handling equipment or activities, industrial machinery or operations, or significant materials from past industrial activity are not presently exposed to stormwater and are not expected to be exposed to stormwater for the certification period. Where a permittee accepts a "no exposure" certification, the permittee shall conduct site inspections of the facility not less than once per permit term to verify the "no exposure" exemption
- The permittee(s) may also waive monitoring requirements under this permit for facilities that it/they determine(s) are in compliance with the TPDES Multi-Sector General Permit No. TXR050000.

d. Wet Weather Characterization Sampling Program (if applicable): The permittee(s) participate(s) in a Wet Weather Characterization Program through a regional effort coordinated by the North Central Texas Council of Governments (NCTCOG). From 1997-2001 the permittee(s) conducted land use monitoring of stormwater outfalls

within the MS4. For the current permit term, as well as the upcoming permit term, the permittee(s) is/are working in conjunction with other regional participants on an instream monitoring program to more accurately assess the effects of urban runoff on city streams and establish baseline data on the receiving streams to use in determining the long term trends associated with stormwater runoff. The TCEQ, by letter of April 15, 2003, approved the original NCTCOG monitoring program.

In this application, the permittee(s) has/have requested approval to conduct sampling in accordance with a revised Regional Wet Weather Characterization Program (RWWCP). Specific changes to the original approved RWWCP were proposed by the NCTCOG by letter dated December 13, 2010. TCEQ approved this updated plan by letter dated February 11, 2011. The approved RWWCP includes certain revisions, and is described in Part VII.B.1.a of this fact sheet.

TCEQ supports the participation of the permittee(s) in the RWWCP. However, if the permittee(s) choose(s) instead to perform Wet Weather Characterization Sampling according to the Representative Storm Event Monitoring option in lieu of the Regional Wet Weather Characterization Program (RWWCP) option then the permittee(s) must conduct outfall monitoring at the____ (insert number of outfalls) specified in the permit.

e. Storm Event Discharge Monitoring. The existing permit requires the permittee(s) to comply with the monitoring requirements in Part IV of the permit to characterize the discharge from the MS4.

f. Floatables Monitoring. The existing permit requires the permittee(s) to implement a floatables program as described in Part IV, Section B of the permit.

**P. Mailing Addresses for Submittal of the Application.**

Submit the original application, along with two (2) complete copies, to the appropriate address below:

For Standard U.S. Mail Service:
Executive Director
Texas Commission on Environmental Quality
Attn: Water Quality Division
Business and Program Services Section
Applications Review and Processing Team (MC-148) P.O. Box 13087
Austin, Texas 78711-3087

| | |
|---|---|
| For Express Mail: | Applications Review and Processing Team (MC-148)<br>Texas Commission on Environmental Quality<br>12100 Park 35 Circle<br>Austin, Texas 78753 |
| For Hand Delivery: | Applications Review and Processing Team (MC-148)<br>Texas Commission on Environmental Quality<br>Building F, Room 2101<br>12100 Park 35 Circle<br>Austin, Texas 78753 |

## Q. Telephone Inquiries

| | |
|---|---|
| Administrative Information: | (512) 239-4671<br>Water Quality Applications Review and Processing Team |
| Technical Information: | (512) 239-4671<br>Storm Water and Pretreatment Team, Water Quality Standards Implementation Team |
| Legal Information: | (512) 239-0600<br>Environmental Law Division |

## R. Signatory Requirements

The application form shall be signed by the applicant and, if applicable, the co-applicant(s), in accordance with TCEQ rules at 30 TAC § 305.44. The application must be signed by the official indicated below, according to the type of entity:

- municipality - a principal executive officer or a ranking elected official
- independent school district - at least the level of assistant superintendent
- state, federal or other public facility - a principal executive officer or a ranking elected official

If a co-permittee is required, a signature page from both entities must be submitted. Make a copy of the blank signature page if a co-permittee signature page must be submitted.

The signature page must bear the seal of the notary public and other requested notary information. The signature date and the notary date must be the same date. If the dates differ, the signature page will not be

accepted. If the signature page is not notarized, the signature page will not be accepted.

## SIGNATURE PAGE

I, Joseph Neeb Title: City Manager
Typed or printed name

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 there are significant penalties for submitting false information, including the possibility of fine and imprisonment for known violations.

Signature: _____ Date: 4.9.24

**NOTE: ALL APPLICATIONS MUST BEAR THE SIGNATURE AND SEAL OF NOTARY PUBLIC.**

Subscribed and Sworn to before me by the said City Manager

on this 9th day of April, 2024

My commission expires on the 07 day of 02, 2027.

_____
Notary Public

Webb
_____
County, Texas

[SEAL]

IRENE GARCIA
Notary Public, State of Texas
Comm. Expires 02-07-2027
Notary ID 134187896

**NOTE: If co-permittees are necessary, all entities must submit separate Signature Pages.**

**Co-applicant:**

**SIGNATURE PAGE**

I, Cesar Vela Title: Vice President of Finance and Administration
Typed or printed name

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 there are significant penalties for submitting false information, including the possibility of fine and imprisonment for known violations.

Signature:_____ Date: 4-15-24

**NOTE: ALL APPLICATIONS MUST BEAR THE SIGNATURE AND SEAL OF NOTARY PUBLIC.**

Subscribed and Sworn to before me by the said Cesar Vela

on this 15th day of April, 2024

My commission expires on the 18th day of December, 2025.

Elizabeth Bocanegra
Notary Public
Webb
County, Texas

[SEAL]

ELIZABETH BOCANEGRA
Notary Public, State of Texas
Comm. Expires 12-18-2025
Notary ID 10586350

**NOTE: If co-permittees are necessary, all entities must submit separate Signature Pages.**

**For TCEQ staff use only:**

| | |
|---|---|
| Application Type: | Renewal<br>Major Amendment<br>Minor Amendment<br>New |
| Agency Receiving SPIF: | Texas Historical Commission<br>Texas Parks & Wildlife<br>US Fish & Wildlife<br>Army Corps of Engineers |

County: _____

Segment: _____

Admin Complete Date: _____

---

**SUPPLEMENTAL PERMIT INFORMATION FORM (SPIF)**

**This form applies to TPDES applications**

**The SPIF must be completed as a separate document. We will mail a copy of the SPIF to each agency as required by the TCEQ agreement with EPA. If any of the items are not completely addressed and/or further information is needed, you will be contacted to provide the information before the permit is issued. Each item must be completely addressed. DO NOT REFER TO A RESPONSE OF AN ITEM IN THE PERMIT APPLICATION FORM. Each attachment must be provided with this form, separately from the administrative report of the application. The application will not be declared administratively complete without this form being completed in its entirety including all attachments.**

**The following applies to all applications:**

1. Permittee(s): City of Laredo and Laredo College
2. TPDES Permit No.: WQ0004592000
3. (EPA ID No. ): TXS001401
4. Address of the project (description of the MS4 boundaries):
   See Attachment 5
5. Provide the name, address, telephone and fax number of an individual that can be contacted to answer specific questions about the property.
   See Attachment 5
6. List the county in which the MS4 is located: Webb

7. If the property is publicly owned and the owner is different than the permittee/applicant, please identify the owner: N/A

8. Identify the name of the water body (receiving waters) or TCEQ segment number that will receive the discharge: See Attachment 5

9. Provide a 7.5 minute USGS quadrangle map with the project boundaries plotted and a general location map showing the project area. (This map is required in addition to the map requested in the application administrative report.) See Attachment 5 and 8.

10. Provide original photographs of any structures 50 years or older on the property. N/A. See Attachment 5.

11. Does your project involve any of the following? See Attachment 5.

[X] Proposed access roads, utility lines, and construction easements
~~Visual effects that could damage or detract from a historic property's integrity~~
~~Vibration effects during construction or as a result of project design~~
[X] Additional phases of development that are planned for the future
Sealing of caves, fractures, sinkholes, or other karst features
[X] Disturbance of vegetation or wetlands

12. List proposed construction impact (surface acres to be impacted, depth of excavation, sealing of caves or other karst features): See Attachment 5

13. Describe existing disturbances, vegetation & land use (plowing, other ground disturbances): See Attachment 5

**The following applies only to applications for New TPDES permits and Major Amendments to TPDES Permits:**

14. List construction dates of any buildings or structures on the property: N/A

15. Provide a brief history of the property, and name of the architect/builder, if known: N/A

## S. General Information

### Permit Application Forms

The new, major amendment, minor amendment, and renewal applications with instructions are available in Adobe Acrobat PDF format on the TCEQ web site:
http://www.tceq.state.tx.us/comm_exec/forms_pubs/search_forms.html

### TCEQ Central Registry Core Data Form

The Core Data Form has been incorporated into this form. Do not send a core data form to TCEQ.

You can search by the RN, CN, name (permittee), or permit number under the search field Additional ID.

The customer (permittee) is responsible for providing current information to the TCEQ, and for updating all CN and RN data for all authorizations as changes occur.

### Fees are associated with a MS4 Permit

Payment of the fees may be made by check or money order payable to TCEQ, or through EPAY (electronic payment through the web). The permit requires two different fees.

(a) Application Fee:

This fee is required to be paid at the time the application is submitted. Failure to submit payment at the time the application is filed will cause delays in acknowledgment or denial of coverage under the general permit.

(2) Mailed Payments

Payment must be mailed in a separate envelope to one of the addresses below. Include the attached Application Fee submittal form. (Send only the application fee submittal form. Do not send a copy of the application.) <fee submittal form only applies to GP's for now>

(3) BY REGULAR U.S. MAIL

Texas Commission on Environmental Quality
Cashier's Office, MC-214
P.O. Box 13088
Austin, TX 78711-3088

(4) BY OVERNIGHT/EXPRESS MAIL

Texas Commission on Environmental Quality
Cashier's Office, MC-214
12100 Park 35 Circle
Austin, TX 78753

(5) ePAY Electronic Payment

Go to: www.tceq.state.tx.us/epay

When making the payment you must select Water, and then select the fee under the category MS4. You must include a copy of the payment voucher with your application, which will not be considered complete without the payment voucher.

(6) Annual Water Quality Fee:

This fee is assessed to permittees with an active authorization on September 1 of each year. The permittee will receive an invoice for payment of the annual fee in November. The payment will be due 30 days from the invoice date. A 5% penalty will be assessed if the payment is not received by TCEQ by the due date. Annual fee assessments cannot be waived as long as the permit is active on September 1.

(7) Mailed Payments

Return your payment with the billing coupon provided with the billing statement.

(8) BY REGULAR U.S. MAIL

Texas Commission on Environmental Quality
Cashier's Office, MC-214
P.O. Box 13088
Austin, TX 78711-3088

(9) BY OVERNIGHT/EXPRESS MAIL

Texas Commission on Environmental Quality
Cashier's Office, MC-214
12100 Park 35 Circle
Austin, TX 78753

(10) ePAY Electronic Payment

Go to: www.tceq.state.tx.us/epay
Enter your account number provided at the top portion of your billing statement. Payment methods include MasterCard, Visa, and electronic check payment (ACH). A transaction over $500 can only be made by ACH.

## T. Instructions for filling out the application form

**Important Note:**

**More than one entity may be required to apply for the permit as Co-Permittees.**

The selected entity type indicates the name that must be provided as an applicant for a permit, registration or authorization. It also identifies when a co-applicant/co-permittee on an application for a permit, registration or authorization is required.

**Permittee (Applicant)**

**Enter assigned Customer Number (CN)**

TCEQ's Central Registry will assign each customer a number that begins with "CN," followed by nine digits. This is not a permit number, registration number, or license number.

- If this customer has not been assigned a CN, leave the space for the CN blank.
- If this customer has already been assigned this number, enter the permittee's CN.

**Mailing Address**
Provide a complete mailing address for receiving mail from the TCEQ. The address must be verifiable with the US Postal Service at http://www.usps.com for regular mail delivery (not overnight express mail). If you find that the address is not verifiable using the USPS web search, please indicate the address is used by the USPS for regular mail delivery.

**Phone Number**
This number should correspond to this customer=s mailing address given earlier. Enter the area code and phone number here. Leave Extension blank if this customer's phone system lacks this feature.

**Fax Number and E-mail Address**
This number and E-mail address should correspond to applicant's mailing address provided earlier. (Optional Information)

**Type of Customer**
Check only one box that identifies the type of entity. Use the descriptions below to identify the appropriate entity type.

Note that the selected entity type also indicates the name that must be provided as an applicant for a permit, registration or authorization. It also identifies when a co-applicant/co-permittee on an application for a permit, registration or authorization is required.

**Government - Federal, state, county, or city government (as appropriate)**
The customer is either an agency of one of these levels of government or the governmental body itself. The government agency's 'legal name' must be provided as the applicant. A department name or other description of the organization should not be included as a part the 'legal name' as applicant.

**Other**
The customer does not fit any of the above descriptions. Enter a short description of the type of customer in the blank provided.

**Number of Employees**
Check one box to show the number of employees for this customer's entire company, at all locations. This is not necessarily the number of employees at the site named in the APPLICATION.

**<u>Billing Address</u>**
An annual fee is assessed to each permittee on September 1 of each year. Provide the complete mailing address where the annual fee invoice

should be mailed. Verify the address with the USPS. It must be an address for delivery of regular mail, not overnight express mail. Also, provide a phone number of the permittee's representative responsible for payment of the invoice.

Country Mailing Information
If this address is outside the United States, enter the territory name, country code, and any non-ZIP mailing codes or other nonBU.S. Postal Service features here. If this address is inside the United States, leave these spaces blank.

## Regulated Entity (RE) Information on Project or Site

Regulated Entity Reference Number (RN)

This is a number issued by TCEQ's Central Registry to sites (a location where a regulated activity occurs) regulated by TCEQ. This is not a permit number, registration number, or license number.

- If this regulated entity has not been assigned an RN, leave this space blank.
- If this customer has been assigned this number, enter the permittee's RN.

A new regulated entity number is assigned by Central Registry for each new MS4 permit application since the area under control of the applicant may overlap with other regulated entities. This RN will be assigned during administrative review of the permit application.

**Site Name/Regulated Entity**
Provide the name of the MS4 operation as known by the public in the area where the MS4 is located. The name you provide on this application will be used in the TCEQ Central Registry as the Regulated Entity.

**Mailing Address for the Regulated Entity**
Provide a complete mailing address to be used by TCEQ for receiving mail. In most cases, the address is the same as the permittee.

Name the county, where the largest residential population exists within the MS4's regulated boundaries. If the regulated area falls within additional counties, provide the county names as secondary.

**Latitude and Longitude**
The Latitude and Longitude must be the approximate center of the regulated portion of the small MS4. Enter the latitude and longitude of the site in degrees, minutes, and seconds or decimal form. For help obtaining the latitude and longitude, go to:
www.tceq.state.tx.us/gis/drgview.html or
http://msrmaps.com/advfind.aspx

**Description of Activity Regulated**
In your own words, briefly describe the primary business that you are doing that requires this authorization. Do not repeat the SIC Code description.

## Application Contacts

Provide the name, title and communication information of the person that TCEQ can contact for additional information regarding this application.

**DMR Contact**
Provide the name and mailing address of the person responsible for receiving and submitting DMRs as indicated in the permit. The preprinted DMRs will be provided by the TCEQ Enforcement Division unless you chose to submit electronically.

**Submit data Online…..**
Submit online through eDMR system. Go to Sign up now at:
http://www.tceq.state.tx.us/permitting/steers/steers.html

Establish an electronic reporting account when you get your permit number.

**Plain Language Summary**

1. Enter the name of applicant(s) in this section. The applicant name should match the name associated with the customer number.
2. Enter the Customer Number(s) in this section. Each Individual or Organization is issued a unique 11-digit identification number called a CN (e.g. CN123456789).
3. Choose “operates” in this section for existing facility applications or choose “proposes to operate” for new facility applications.
4. Enter the name of the facility in this section. The facility name should match the name associated with the regulated entity number.
5. Enter the Regulated Entity number in this section. Each site location is issued a unique 11-digit identification number called an RN (e.g. RN123456789).
6. Choose the appropriate article (a or an) to complete the sentence.
7. Enter a description of the facility in this section. For example: a municipal separate storm sewer system (MS4) which conveys stormwater from the City of Texas City to surface water in the state
8. Choose “is” for an existing facility or “will be” for a new facility.
9. Enter the location of the facility in this section.
10. Enter the City nearest the facility in this section.
11. Enter the County nearest the facility in this section.
12. Enter the zip code(s) for the MS4 in this section.
13. Enter a summary of the application request in this section. For example: renewal to discharge stormwater from the MS4 into surface water in the state.

14. List all pollutants expected in the discharge from this facility in this section. If applicable, refer to the pollutants being monitored by the MS4 in the existing permit.

15. Enter the discharge types from your facility in this section (e.g., stormwater, allowable non-stormwater discharges, etc.)

16. Choose the appropriate verb tense to complete the sentence.

17. Enter a description of how discharges are treated or managed. Use additional lines for individual discharge types or outfalls if necessary.

Example - Phase I Municipal Separate Storm Sewer System (MS4) Individual Permit Renewal Application

*The following summary is provided for this pending water quality permit application being reviewed by the Texas Commission on Environmental Quality as required by 30 Texas Administrative Code Chapter 39. The information provided in this summary may change during the technical review of the application and are not federal enforceable representations of the permit application.*

The City of Texas City (CN000000001) owns and operates a Municipal Separate Storm Sewer System (MS4). The City of Texas City MS4 conveys stormwater from the City of Texas City to surface water in the state. The City of Texas City MS4 is located within the corporate boundary of the City of Texas City, in McLennan (County), Texas 76701, 76702, 76703, 76704, 76705, 76706, 76707, 76708, 76710, 76711, 76712, 76714, 76715, 76716, 78797, 78798, and 78799 (RN100000001).

The City of Texas City MS4 discharges stormwater and certain non-stormwater discharges on a variable and intermittent basis. Discharges from the MS4 are expected to contain bacteria, sediments, nutrients, hazardous metals, and oil and grease. Stormwater discharges from the MS4 are managed with best management practices through the implementation of a Stormwater Management Program (SWMP). Examples of best management practices implemented by the City of Texas City include but are not limited to: wet weather screening, dry weather screening, radio announcements to advertise a pollution hotline, construction site inspections, volunteer clean-up events, street sweeping, inflow and infiltration studies of sanitary sewer system, video inspection of sanitary sewer system, and public education material distribution.

## Certification

Each entity applying for the permit is required to sign the certification statement. The certification must bear an original signature of a person meeting the signatory requirements specified under 30 Texas Administrative Code (TAC) §305.44.

The regulation that controls who may sign an application or similar form is 30 Texas Administrative Code §305.44(a)(3) (see below). According to this code provision, only a ranking elected official or principal executive officer may sign an application or similar form. Persons such as the city mayor or county commissioner will be considered ranking elected officials. In order to identify the principal executive officer of your government entity, it may be beneficial to consult your city charter, county or city ordinances, or the Texas statute(s) under which your government entity was formed. An application or similar document that is signed by a government official who is not a ranking elected official or principal executive officer does not conform to §305.44(a)(3). The

signatory requirement may not be delegated to a government representative other than those identified in the regulation. By signing the application or similar form, you are certifying that you are either a ranking elected official or principal executive officer as required by the administrative code. Documentation demonstrating your position as a ranking elected official or principal executive officer may be requested by the TCEQ.

If you have any questions or need additional information concerning the signatory requirements discussed above, please contact the TCEQ's Environmental Law Division at 512/239-0600.

30 Texas Administrative Code §305.44. Signatories to Applications.

(a)All applications shall be signed as follows:

For a municipality, state, federal, or other public agency, the application shall be signed by either a principal executive officer or a ranking elected official. For purposes of this paragraph, a principal executive officer of a federal agency includes the chief executive officer of the agency, or a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., regional administrator of the EPA).

## List of Attachments

| | |
|---|---|
| Attachment 1 | Description of Proposed Modifications to the Storm Water Management Program ("SWMP")<br>(Application Item No. O.(a)) |
| Attachment 2 | USGS Topographic Quadrangle Maps and Related Information<br>(Application Item No. O.(b)) |
| Attachment 3 | Current SWMP, Description of Monitoring and Screening Programs, and Summary of Monitoring Results for the Previous Year<br>(Application Item No. O.(c)) |
| Attachment 4 | Description of Implementation of SWMP Elements<br>(Application Item No. O.(d)) |
| Attachment 5 | Narrative Response to Items on Application Form |
| Attachment 6 | Letter from the Texas General Land Office<br>(Application Item No. J.(g)) |
| Attachment 7 | List of Pollution Control Permits Held by the City of Laredo and Laredo College<br>(Application Item No. K.(e)) |
| Attachment 8 | 7.5 Minute USGS Quadrangle Map.<br>(Application, Supplemental Permit Information Form Item No. 9) |
| Attachment 9 | Proposed Revisions to the City of Laredo's Storm Water Management Plan |
| Attachment 10 | Proof of Payment of Application Fee |

# ATTACHMENT 1

**Application for Renewal**

**for the City of Laredo**

**and Laredo College**

**TPDES Phase I MS4 Permit**

**TPDES Permit No. WQ0004592000**

**City of Laredo, Webb County, Texas**

**RN103014353**

**April 17, 2024**

This page replaces Tab 1 from hard copy.

# Attachment 1

## Description of Proposed Modifications to the Storm Water Management Program (SWMP) and Existing TPDES Permit Requirements (Application Item No. O.(a))

The City of Laredo requests the following modifications to its Storm Water Management Program ("SWMP"):

(1) The SWMP currently identifies that many Best Management Practices ("BMPs") are carried out, at least in part, by the Building Services Department. Specifically, BMPs identified in MCM 2, Post-Construction Stormwater Control Measures, MCM 3, Illicit Discharge Detection and Elimination, and MCM 6, Construction Site Stormwater Runoff, identify the Building Services Department as one of the responsible departments. Due to a reassignment of services between City departments, the City requests to modify its SMWP to identify that the following BMPs will no longer be addressed by the Building Services Department, but instead will be carried out by the City's Engineering Department and/or Environmental & Solid Waste Services Department:

- MCM 2 – Implementation and Enforcement of Controls to minimize discharge of pollutants from areas of new development and redevelopment.
- MCM 2 – Implementation of a comprehensive master planning process for new development and redevelopment projects that disturb one acre or more of land.
- MCM 2 – Evaluation of the existing SWMP as necessary to ensure that this MCM includes a regulatory mechanism, such as an ordinance to implement and enforce the new requirements of this program and shall ensure that the SWMP includes strategies for structural and nonstructural controls (*i.e.*, BMPs) appropriate for the community.
- MCM 2 – Assessment of the impacts on receiving water(s) for all flood control projects.
- MCM 3 – NPDES and TPDES Permittee List.
- MCM 3 – MS4 Mapping
- MCM 6 – Program to reduce discharges of pollutants into the MS4 from construction sites.
- MCM 6 – List of Sites.
- MCM 6 – Construction Site Inspections.

The City's budget now allocates funding associated with these activities to the Engineering Department and the Environmental & Solid Waste Services Department.

(2) The City has updated the List of Municipal Facilities included in MCM 4 to add the Manadas Creek Waste Water Treatment Plant, the Ponderosa Regional Landfill, and the Laredo International Airport.

(3) The City has also added a description of the Ponderosa Regional Landfill in MCM 5.

(4) The City also requests to make minor revisions throughout the SWMP, as shown in the attached redline-formatted SWMP. See Attachment 9.A. These revisions are simply intended to clarify and/or update the SWMP to current practices.

Laredo College does not request any revisions to its SWMP.

# ATTACHMENT 2

**Application for Renewal**

**for the City of Laredo**

**and Laredo College**

**TPDES Phase I MS4 Permit**

**TPDES Permit No. WQ0004592000**

**City of Laredo, Webb County, Texas**

**RN103014353**

**April 17, 2024**

This page replaces Tab 2 from hard copy.

# Attachment 2

## USGS Topographic Quadrangle Maps and Related Information (Application Item No. O.(b)(1)-(7))

*No. O.(b)(1)-(3) & (5)-(7). Original USGS topographic quadrangle maps showing:*

*(1) The location and boundaries of the MS4, including an area extending at least one (1) mile beyond the service boundaries of the MS4;*
*(2) all point(s) of discharge from the MS4;*
*(3) a delineation of the discharge route that beings at the MS4 outfalls that are part of the West Weather Characterization Program (001, 002, etc.) and traced with a highlighter for a distance of three (3) stream miles or to the point that the discharge reaches a classified segment listed in 30 TAC, Chapter 307, Appendix A.*
*(5) the location . . . of each currently operating or closed municipal landfill or the treatment, storage, or disposal facility for municipal waste;*
*(6) the location of major structural controls for storm water discharge, including detention/retention ponds, major infiltration devices, etc.; and*
(7) *the identification of publicly owned parks, recreational areas, and other open lands.*

See attached maps:

- USGS Quadrangle – Quad 1 of 8 – Dolores Ranch
- USGS Quadrangle – Quad 2 of 8 – Cuervo Creek
- USGS Quadrangle – Quad 3 of 8 – Orvil
- USGS Quadrangle – Quad 4 of 8 – Laredo West
- USGS Quadrangle – Quad 5 of 8 – Laredo East
- USGS Quadrangle – Quad 6 of 8 – Laredo South
- USGS Quadrangle – Quad 7 of 8 – Blancas Creek North
- USGS Quadrangle – Quad 8 of 8 – Isla Mesteno, O'Keefe Lake
- Existing and Proposed Land Uses

*No. O.(b)(4). A description of the land use activities, including estimations of population density and projected growth for a ten (10)-year period within the MS4 drainage area.*

The following table identifies current land use activities in the City of Laredo.

| State Codes | Parcels | Average of SqFt per Parcel | Total SqFt | % of Total Area |
|---|---|---|---|---|
| A1 SF Residential | 56684 | 6,741.88 | 382,156,823.35 | 16.25% |
| A2 Mobile Home | 5375 | 5,682.76 | 30,544,818.33 | 1.30% |
| A5 Bldg. Incomplete | 382 | 6,424.44 | 2,454,136.97 | 0.10% |
| B1 Multifamily | 1179 | 29,156.09 | 34,375,030.15 | 1.46% |
| C1 Vacant Residential | 6460 | 48,127.53 | 310,903,872.65 | 13.22% |
| D1 Acreage Qualified | 190 | 2,967,445.35 | 563,814,617.10 | 23.98% |
| E Farm/Ranch Improv | 534 | 521,987.71 | 278,741,436.48 | 11.85% |
| F1 Commercial | 6328 | 110,839.85 | 701,394,568.89 | 29.83% |
| F2 Industrial | 12 | 235,319.77 | 2,823,837.27 | 0.12% |
| J1 Gas Co. | 36 | 496,949.29 | 17,890,174.49 | 0.76% |
| J2 Gas Co | 7 | 25,562.74 | 178,939.18 | 0.01% |
| J3 Electric Co | 19 | 397,935.46 | 7,560,773.72 | 0.32% |
| J4 Telephone Co | 7 | 21,364.36 | 149,550.49 | 0.01% |
| J5 Railroad | 173 | 104,287.94 | 18,041,813.96 | 0.77% |
| J7 Cable TV | 1 | 79,134.56 | 79,134.56 | 0.00% |
| M1 Mobile Home | 8 | 40,655.52 | 325,244.19 | 0.01% |
| **Grand Total** | **77395** | **30,382.26** | **2,351,434,771.77** | **100.00%** |

Population growth projections for the City of Laredo are included in the following table:

| Year | Population |
|---|---|
| 2016 | 251,671* |
| 2017 | 255,305 |
| 2018 | 257,575 |
| 2019 | 259,151 |
| 2020 | 260,571 |
| 2021 | 254,697 |
| 2022 | 255,294 |
| 2023 | 255,890 |

| Year | Population |
|---|---|
| 2024 | 257,108 |
| 2025 | 258,954 |
| 2026 | 261,440 |
| 2027 | 264,583 |
| 2028 | 268,403 |
| 2029 | 272,928 |
| 2030 | 278,190 |
| 2031 | 284,867 |
| 2032 | 291,703 |
| 2033 | 298,704 |
| 2034 | 305,873 |

* Past population data is based on ACS 5-year estimates.

*No. O.(b)(5). A description of the activities of each currently operating or closed municipal landfill or the treatment, storage or disposal facility for municipal waste.*

The City of Laredo owns and operates two Type 1 municipal solid waste ("MSW") landfills.

The City of Laredo Landfill is located approximately 1.96 miles east of the Loop 20 and State Highway 359 intersection. This 203.1-acre permitted landfill, TCEQ Permit No. MSW-1693B, has been in operation since 1986 and originally had a design life span of twenty years. The City received a permit amendment in early 2016 that will extend the life of the landfill for an additional sixteen or seventeen years. The City developed a Storm Water Pollution Prevention Plan ("SWPPP") in compliance with the requirements of the Texas Pollutant Discharge Elimination System ("TPDES") general permit for storm water discharges from industrial activities ("Multi-Sector General Permit" or "MSGP"), TPDES General Permit No. TXR050000. The permit number assigned to the City pursuant to the MSGP is TXR05DC19. The SWPPP and sampling activities at the City's MSW landfill are in compliance with the MSGP.

The Ponderosa Regional Landfill (TCEQ Permit No. MSW-2286) is a 499-acre permitted Type I MSW landfill, with a disposal foot print of approximately 347 acres. It has been in operation since 2013, and its design life span is estimated at 94.3 years. The Ponderosa Regional Landfill has a SWPPP in compliance with the requirements of the MSGP. The permit number assigned to the Ponderosa Regional Landfill pursuant to the MSGP is TXR05ET01. The SWPPP and sampling activities at the Ponderosa Regional Landfill are in compliance with the TPDES MSGP.

Quadrangle Overlapped by One-mile Buffer of City Limits

San Pedro Hill

Cerritos Blancos

Fort Mcintosh 3 NE

Dolores Ranch

Santo Tomas Creek

Rio Grande

# City of Laredo, Texas TPDES Permit Renewal
# Resource Agency Review Map

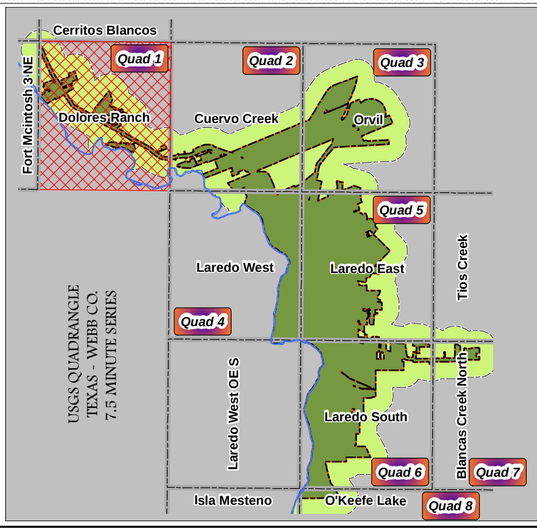
## USGS Topographic Quadrangle

Middle Rio Grande Basin Segment 2304

0 0.5 1 2 Miles

1 = 24,000

NORTH




Disclaimer: The information provided in this map was submitted to, gathered by and/or developed by the City of Laredo from various sources. Geographic information has a high probability of becoming outdated from the time it is collected and therefore, at-present ground conditions should be assessed to determine the accuracy of provided information. The City of Laredo assumes no liability for any decisions made or actions taken or not taken by the user of this data in reliance upon any data furnished herewith. The use of the data indicates your unconditional acceptance of all risks associated with the use of this data.

## Legend

- Wet Weather Mon. Loc.
- Dry Weather Mon. Loc. (outfalls)
- Major Structural Controls
- Parks

**Landfills**

- Active (1)
- Closed

**Monitoring Station Flowpath**

- Canal, Guerrero, Jefferson
- Bustamante
- Enterprise
- Laredo City Limits
- One Mile Buffer of MS4 Service Area

**Quad 1 of 8**

Map Date: April 2024

CITY OF LAREDO – ENVIRONMENTAL SERVICES DEPARTMENT

# City of Laredo, Texas TPDES Permit Renewal
# Resource Agency Review Map

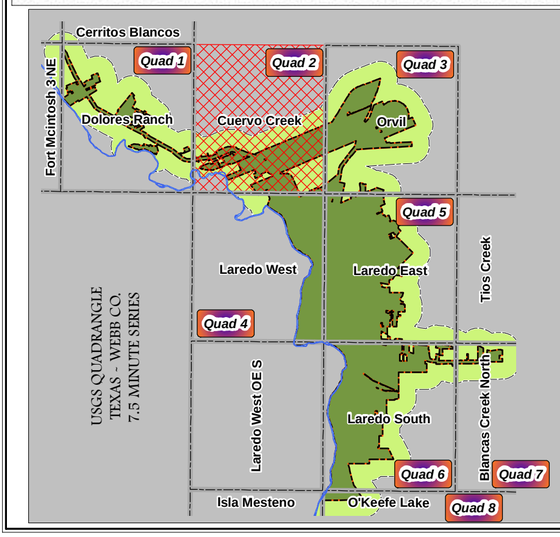
## USGS Topographic Quadrangle

Middle Rio Grande Basin Segment 2304

0 0.5 1 2 Miles

1 = 24,000

NORTH

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### Legend

- Wet Weather Mon. Loc.
- Dry Weather Mon. Loc. (outfalls)
- Major Structural Controls
- Parks

**Landfills**

- Active (1)
- Closed

**Monitoring Station Flowpath**

- Canal, Guerrero, Jefferson
- Bustamante
- Enterprise
- Laredo City Limits
- One Mile Buffer of MS4 Service Area

**Quad 2 of 8**

Map Date: April 2024

# City of Laredo, Texas TPDES Permit Renewal
# Resource Agency Review Map

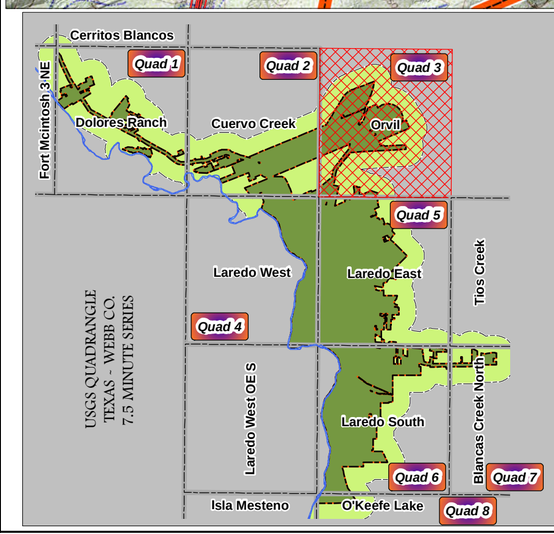
## USGS Topographic Quadrangle

Middle Rio Grande Basin Segment 2304

0 0.5 1 2 Miles

1 = 24,000

NORTH

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### Legend

- Wet Weather Mon. Loc.
- Dry Weather Mon. Loc. (outfalls)
- Major Structural Controls
- Parks

**Landfills**

- Active (1)
- Closed

**Monitoring Station Flowpath**

- Canal, Guerrero, Jefferson
- Bustamante
- Enterprise
- Laredo City Limits
- One Mile Buffer of MS4 Service Area

**Quad 3 of 8**

Map Date: April 2024

CITY OF LAREDO – ENVIRONMENTAL SERVICES DEPARTMENT

# City of Laredo, Texas TPDES Permit Renewal
# Resource Agency Review Map

## USGS Topographic Quadrangle

Middle Rio Grande Basin Segment 2304

0 0.5 1 2 Miles

1 = 24,000

NORTH




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### Legend

- Wet Weather Mon. Loc.
- Dry Weather Mon. Loc. (outfalls)
- Major Structural Controls
- Parks

**Landfills**

- Active (1)
- Closed

**Monitoring Station Flowpath**

- Canal, Guerrero, Jefferson
- Bustamante
- Enterprise
- Laredo City Limits
- One Mile Buffer of MS4 Service Area

**Quad 4 of 8**

Map Date: April 2024

CITY OF LAREDO – ENVIRONMENTAL SERVICES DEPARTMENT

# City of Laredo, Texas TPDES Permit Renewal
# Resource Agency Review Map

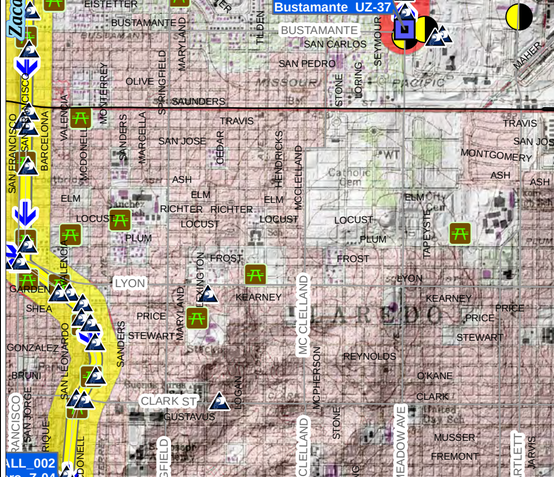
## USGS Topographic Quadrangle

Middle Rio Grande Basin Segment 2304

0 0.5 1 2 Miles

1 = 24,000

NORTH

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### Legend

- Wet Weather Mon. Loc.
- Dry Weather Mon. Loc. (outfalls)
- Major Structural Controls
- Parks

**Landfills**

- Active (1)
- Closed

**Monitoring Station Flowpath**

- Canal, Guerrero, Jefferson
- Bustamante
- Enterprise
- Laredo City Limits
- One Mile Buffer of MS4 Service Area

**Quad 5 of 8**

Map Date: April 2024

OUTFALL_003
Bustamante UZ-37

OUTFALL_002
Guerrero Z-04

Zacate Creek

Upper Zacate Creek

Chacon Creek

San Ygnacio Creek

Tios Creek

LAKE BLANCA

CASA BLANCA LAKE

Rio Grande

CITY OF LAREDO - ENVIRONMENTAL SERVICES DEPARTMENT

# City of Laredo, Texas TPDES Permit Renewal
# Resource Agency Review Map

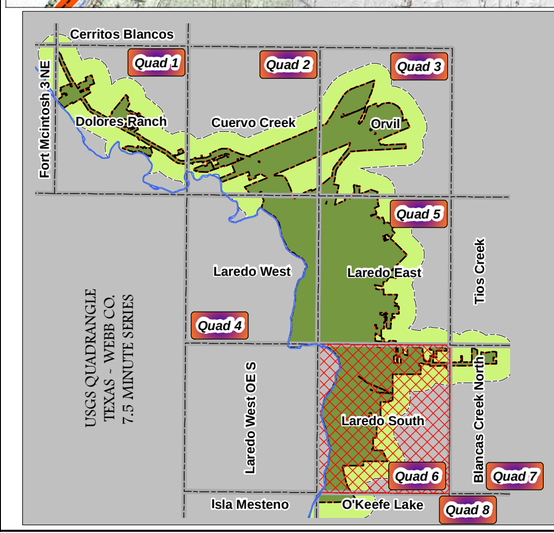
## USGS Topographic Quadrangle

Middle Rio Grande Basin Segment 2304

0 0.5 1 2 Miles

1 = 24,000

NORTH






### Legend

- Wet Weather Mon. Loc.
- Dry Weather Mon. Loc. (outfalls)
- Major Structural Controls
- Parks

**Landfills**

- Active (2)
- Closed

**Monitoring Station Flowpath**

- Canal, Guerrero, Jefferson
- Bustamante
- Enterprise
- Laredo City Limits
- One Mile Buffer of MS4 Service Area

**Quad 6 of 8**

Map Date: April 2024

# City of Laredo, Texas TPDES Permit Renewal
# Resource Agency Review Map

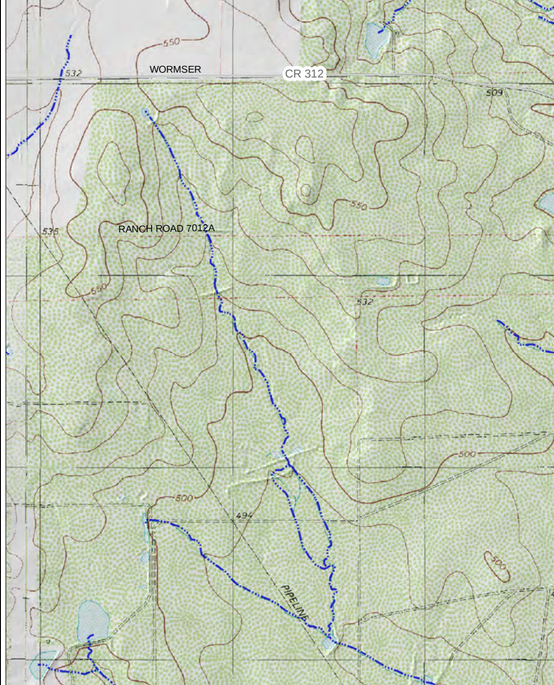
## USGS Topographic Quadrangle

Middle Rio Grande Basin Segment 2304

0 0.5 1 2 Miles

1 = 24,000

NORTH




### Legend

- Wet Weather Mon. Loc.
- Dry Weather Mon. Loc. (outfalls)
- Major Structural Controls
- Parks

**Landfills**

- Active (2)
- Closed

**Monitoring Station Flowpath**

- Canal, Guerrero, Jefferson
- Bustamante
- Enterprise
- Laredo City Limits
- One Mile Buffer of MS4 Service Area



**Quad 7 of 8**

Map Date: April 2024

# City of Laredo, Texas TPDES Permit Renewal
# Resource Agency Review Map

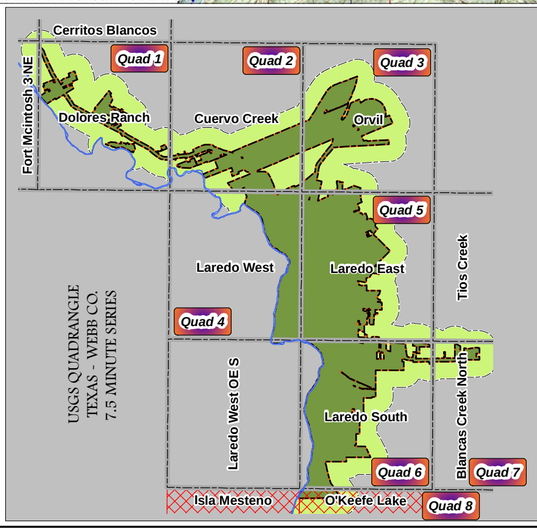
## USGS Topographic Quadrangle

Middle Rio Grande Basin Segment 2304

0 0.5 1 2 Miles

1 = 24,000

NORTH

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### Legend

- Wet Weather Mon. Loc.
- Dry Weather Mon. Loc. (outfalls)
- Major Structural Controls
- Parks

**Landfills**

- Active (2)
- Closed

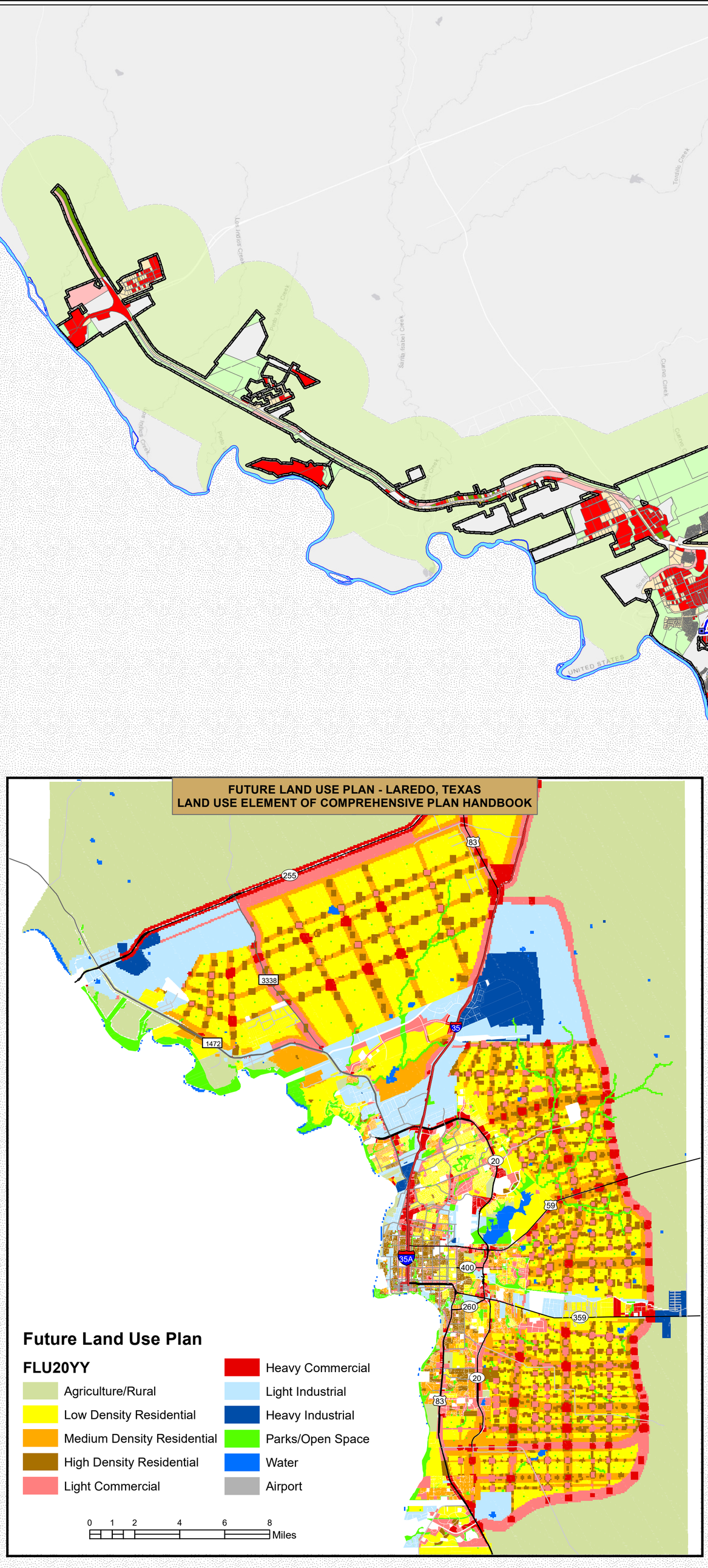
**Monitoring Station Flowpath**

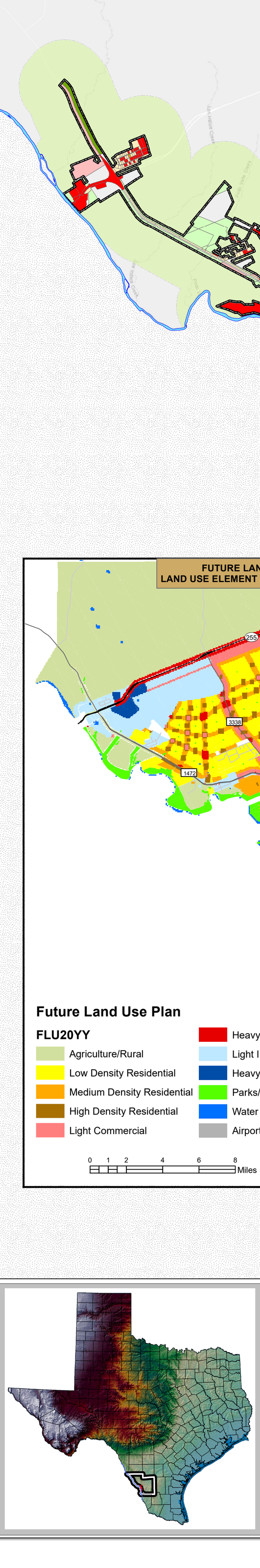
- Canal, Guerrero, Jefferson
- Bustamante
- Enterprise
- Laredo City Limits
- One Mile Buffer of MS4 Service Area

**Quad 8 of 8**

Map Date: April 2024

CITY OF LAREDO – ENVIRONMENTAL SERVICES DEPARTMENT



# City of Laredo, Texas TPDES Permit Renewal
# Resource Agency Review Map

## Existing and Proposed Land Use

Middle Rio Grande Basin Segment 2304

0 1 2 4 6 8 Miles

1:90,000

NORTH

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## Existing Conditions Key

- Wet Weather Mon. Loc.
- monitoring_station_watersheds
- Laredo City Limits
- 1 Mi. Buffer of MS4 Service Area

**Existing Landuse**
**STATE CODE & DESCRIPTION**

- A1, SF RESIDENTIAL
- A2, MOBILE HOME
- A5, BLDG INCOMPLETE
- B1, MULTIFAMILY
- C1, VACANT RESIDENTIAL
- C3, VACANT RURAL & RECREAT
- D1, ACREAGE QUALIFIED
- D2, ACREAGE NONQUALIFIED
- E1, FARM/RANCH IMPROV
- F1, COMMERCIAL
- F2, INDUSTRIAL
- J1, GAS CO
- J2, GAS CO
- J3, ELECTRIC CO
- J4, TELEPHONE CO
- J5, RAILROAD
- J7, CABLE TV
- M1, MOBILE HOME
- O1, REAL ESTATE INVENT

Map Date: April 2024

CITY OF LAREDO – ENVIRONMENTAL SERVICES DEPARTMENT



This page replaces Tab 3 from hard copy.

# ATTACHMENT 3

**Application for Renewal**

**for the City of Laredo**

**and Laredo College**

**TPDES Phase I MS4 Permit**

**TPDES Permit No. WQ0004592000**

**City of Laredo, Webb County, Texas**

**RN103014353**

**April 17, 2024**

This page replaces Tab 3 from hard copy.

**Attachment 3**

**Current Storm Water Management Program,
Description of Monitoring and Screening Programs,
and Summary of Monitoring Results for the Previous Year**

See attached current Storm Water Management Programs:

- Attachment 3.A. – City of Laredo Storm Water Management Plan
- Attachment 3.B. – Laredo College Storm Water Management Plan

*A description of monitoring and screening programs.*

The City of Laredo's Storm Water Management Plan ("SWMP") includes provisions for dry weather screening, wet weather screening, and representative wet weather monitoring.

Dry Weather Screening:

As identified in the City's SWMP, the Dry Weather Screening Program consists of developing a map of the City's storm sewer system, locating all storm water outfalls, including major outfalls, and choosing representative field screening points, which will attempt to cover 100% screening. The task of sampling all of the storm water outfalls is divided into five annual screening projects of 20% per year. A study on dry weather flow is performed by collecting samples for laboratory analysis and drawing conclusions on the basis of field and laboratory results. Based on each year's laboratory testing results, the environmental technicians will gradually add the task of resampling those outfalls suspected of having illicit discharges to the 20% storm water outfall screening project for a particular year.

A team of technicians is assigned the task of selecting the outfalls to be tested, taking grab samples from the outfalls, transporting the samples to the City's Environmental & Solid Waste Services Department, and performing the corresponding storm water outfall screening tests. A CHEMetrics™ analysis kit equ8ped with specific ampoules will be utilized for the analysis of ammonia, total chlorine, total copper, detergents, and total phenols. Also, an Orion M1230 microprocessor based multiprobe meter will be utilized to measure pH, conductivity, temperature, dissolved oxygen (DO), and salinity. Finally, a Quanti-Tray / 2000 with Colisure Test will be utilized to estimate *E. coli* numbers. The designated technicians will follow all necessary QA/QC measures. The dry weather screening schedule is devised to increase productivity by having

technicians attend outfall locations in close proximity to one another on a regular basis. The program will be conducted in specific months of every year. All samples will be collected after at least a 72-hour period of dryness between storm events.

During the most recent reporting period (*i.e.*, as reported in the Year 4 Annual Report), the City's Environmental & Solid Waste Services Department conducted inspections on 20% of the outfalls in the City for a total of 191 dry weather inspections. Of the 191 inspections, twelve had effluent. None of these twelve had test values that indicated illicit discharges.

Wet Weather Screening

The City's Wet Weather Screening Program screens pollutants within the City's four major watersheds during storm events. Screening is conducted twice a year for each of the watersheds. Four grab sample locations (*i.e.*, one per watershed) have been chosen based on accessibility and safety of the location. The four watersheds to be tested are Chacon, Zacate, Upper Zacate, and Manadas. The Wet Weather Screening Program monitor major watersheds as opposed to specific land uses.

City staff performs analysis of the collected samples by using a CHEMetrics™ analysis kit equipped with specific ampoules for the analysis of ammonia, copper, total chlorine, phenols, and detergents. Additionally, an Orion M1230 microprocessor based multiprobe meter will be utilized to measure pH, conductivity, temperature, DO, and salinity. A Quanti-Tray / 2000 with Colisure Test is utilized to estimate *E. coli* numbers. The designated technicians follow all QA/QC measures necessary.

As identified in the Year 4 Annual Report, the data collected as part of the Wet Weather Screening Program was conducted on the identified watershed basis. The data collected is utilized to assist the City in understanding the water quality trends from each major watershed. No high or above normal pollution loadings were detected.

Representative Wet Weather Monitoring

The purpose of the representative wet weather monitoring program is to characterize the quality of storm water discharges from the City's municipal separate storm sewer system ("MS4"). Five representative monitoring outfall locations have been established:

- Outfall 001 – Station located at 601 West Canal Street approximately 300 yards east of I-35 on West Canal between Pep Boys and Stein Mart.

- Outfall 002 – Station located at 102 West Guerrero Street on Zacate Creek.
- Outfall 003 – Station located at the intersection of Bustamante Street and Meadow Street.
- Outfall 004 – Station located at 602 Enterprise Street.
- Outfall 005 – Station located at 517 Jefferson Street at San Eduardo Street.

These outfalls are sampled at least once per season for representative storm events, which are storm events greater than 0.1 inch in magnitude and that occur at least seventy-two hours from the previous measurable storm event. Analysis and collection of samples are in accordance with the methods specified in 40 C.F.R. Part 136. The following parameters are analyzed for each sample:

- Biochemical Oxygen Demand, 5-day
- Chemical Oxygen Demand (COD)
- Oil and Grease
- Total Suspended Solids (TSS)
- Total Dissolved Solids (TDS)
- Total Nitrogen
- Total Kjeldahl Nitrogen (TKN) (*i.e.*, ammonia nitrogen plus nitrate-nitrogen)
- Total Antimony
- Total Arsenic
- Total Phosphorus
- Dissolved Phosphorus
- Total Cadmium
- Total Chromium
- Total Copper
- Total Lead
- Total Mercury
- Total Nickel
- Total Silver
- Total Selenium
- Total Thallium
- Total Zinc
- Chlordane
- 4,4'-DDE
- Total Polychlorinated Biphenyls (PCBs)
- Methylene Chloride
- Toluene
- *E. coli*

- pH
- Hardness (as $CaCO_3$)
- Temperature (C)
- Atrazine

The City estimates annual pollutant loadings from the data acquired from the representative wet weather monitoring program.

As identified in the Year 4 Annual Report, the wet weather monitoring program was performed at all five monitoring stations during the following seasons: October 2022 to January 2023; February 2023 to May 2023; and July 2023 to September 2023. The wet weather monitoring results were reported to TCEQ using Discharge Monitoring Reports (DMRs) submitted online via NetDMR.

*A summary of monitoring results for the previous year.*

Attached are the seasonal loading and event mean concentration data for the five representative wet weather monitoring stations for Year 4 of the current MS4 permit. *See* Attachment 3.C.

## List of Attachments

| | |
|---|---|
| Attachment 3.A. | City of Laredo Storm Water Management Plan |
| Attachment 3.B. | Laredo College Storm Water Management Plan |
| Attachment 3.C. | Seasonal Loadings and Event Mean Concentration Data for Year 4 of Current MS4 Permit |

# ATTACHMENT 3.A.

**Application for Renewal**

**for the City of Laredo**

**and Laredo College**

**TPDES Phase I MS4 Permit**

**TPDES Permit No. WQ0004592000**

**City of Laredo, Webb County, Texas**

**RN103014353**

**April 17, 2024**

This page replaces Tab 3.A. from hard copy.

# STORM WATER MANAGEMENT PLAN

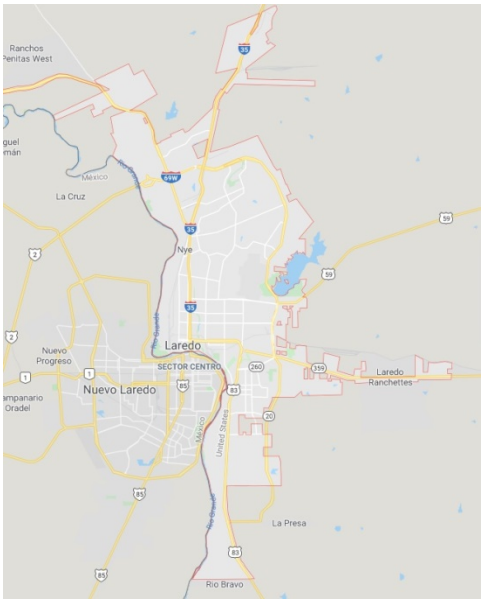

## 2019 TO 2024

City of Laredo, Texas

Phase I MS4 (WQ0004592000)

www.esd.cityoflaredo.com
City of Laredo
Environmental Services Department
619 Reynolds Street, Laredo, Texas 78040

# CITY OF LAREDO
# WQ0004592000




## MUNICIPAL SEPARATE STORM SEWER SYSTEM (***MS4)***
## STORM WATER MANAGEMENT PROGRAM (***SWMP)***

In compliance with
The Texas Commission on Environmental Quality
Permit to Discharge
Under the Texas Pollutant Discharge Elimination System
Permit No. WQ0004592000, issued October 15, 2019
Permit term 5 years ***2019-2024***

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## Table of Contents

In 1972, Congress amended the Federal Water Pollution Control Act (commonly referred to as the Clean Water Act "CWA" to prohibit the discharge of any pollutant to waters of the United States from a point source unless the discharge is authorized by an National Pollutant Discharge Elimination System ("NPDES") permit. The NPDES program is designed to track point sources and requires the implementation of controls necessary to minimize the discharge of pollutants.

In 1987, Congress amended the CWA to require implementation, in two phases, of a comprehensive national program for addressing storm water discharges. The first phase of the program, commonly referred to as "Phase I," was promulgated by the U.S. Environmental Protection Agency ("EPA") on November 16, 1990 (Federal Register, Volume 55, Page 47,990 [55 FR 47990]). Phase I requires NPDES permits for storm water discharge from a large number of priority sources, including municipal separate storm sewer systems ("MS4's") generally serving populations of 100,000 or more and several categories of industrial activity, including construction sites that disturb five or more acres of land.

EPA promulgated the second phase of the storm water regulatory program, commonly referred to as "Phase II," on December 8, 1999 (64 FR 68722). Phase II regulations address storm water discharges from certain MS4's serving populations of less than 100,000 people and , included construction sites that disturb one or more acres of land.

As a Phase I city, the City of Laredo is required to implement and enforce a Storm Water Management Program ("SWMP") designed to reduce the discharge of pollutants from the MS4 to the maximum extent practicable, to protect water quality.

EPA has delegated authority to issue MS4 storm water discharge permits to the State of Texas. Under the authority of the Texas Water Code and the CWA, the Texas Commission on Environmental Quality ("TCEQ") is the regulatory body responsible for issuing permits regulating discharges from Phase I and II MS4s to surface waters in the state.

On October 15, 2019 the TCEQ issued the third storm water permit to the City of Laredo (WQ0004592000). This permit requires that the City of Laredo comply with a number of administrative and legal requirements and to update, implement, and enforce a SWMP designed to reduce the discharge of pollutants from the MS4 to the maximum extent practicable to protect water quality.

The MS4 permit is issued to both the City of Laredo and Laredo Community College (“LCC”). The City of Laredo and LCC entered into an Interlocal Agreement several whereby the City of Laredo implements a SWMP for LCC.

**2019 to 2024 Best Management Practices**

Best Management Practices (BMPs) can include schedules of activities, prohibition of practices, maintenance procedures, structural controls, local ordinances, and other management practices to prevent or reduce the discharge of pollutant. BMPs also include treatment requirements, operating procedures and practices to control runoff, spills or leaks, waste disposal, or drainage from raw material storage areas.

**Minimum Control Measures** Established in the MS4 Permit

**Best Management Practices** Selected by the MS4 Operator (City of Laredo)

**Responsible Authority (City Department)** Identified to do the following:

- ☐ Implement BMPs;
- ☐ Evaluate BMP effectiveness annually; and
- ☐ Document activity for annual reports.

**Measurable Goals** are milestones used by the MS4 operator (City of Laredo) and TCEQ to track progress and effectiveness of BMPs in reducing pollutants to the Maximum Extent Practicable (MEP). Measurable Goals include:

- A quantifiable target or other specified frequency to measure progress
- A schedule or date of completion

| Minimum Control Measures (MCMs) | |
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| **MCM 1** | **MS4 Maintenance Activities** |
| **MCM 2** | **Post- Construction Stormwater Control Measures** |
| **MCM 3** | **Illicit Discharge Dectection and Elimination** |
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| Minimum Control Measures & Best Management Practices | Responsible Department |
|---|---|
| **MCM 1 MS4 Maintenance Activities** | |
| Structural Controls | Environmental Services Department, Engineering Department |
| Floatables | Environmental Services Department |
| Roadways | Public Works Department |
| **MCM 2 Post-Construction Stormwater Control Measures** | |
| Implementation and Enforcement of Controls to minimize discharge of pollutants from areas of new development and significant redevelopment | Environmental Services Department, Engineering Department, and Building Services Department |
| Implementation of a comprehensive master planning process for new development and redevelopment projects that disturb one acre or more of land | Environmental Services Department, Engineering Department, and Building Services Department |
| Evaluation of the existing SWMP as necessary to ensure that this MCM includes a regulatory mechanism, such as an ordinance, to implement and enforce the new requirements of this program and shall ensure that the SWMP includes strategies for structural and nonstructural controls (i.e., BMPs) appropriate for the community. | Environmental Services Department, Engineering Department, and Building Services Department |
| Assessment of the impacts on receiving water(s) for all flood control projects. | Environmental Services Department, Engineering Department, and Building Services Department |
| **MCM 3 Illicit Discharge Detection and Elimination** | |
| Prohibition of illicit non-stormwater discharges from entering the MS4. | Environmental Services Department |
| Miscellaneous, non-stormwater discharges that are authorized. | Environmental Services Department |
| Elimination of Illicit Discharges and Improper Disposal. | Environmental Services Department |
| Overflows and Infiltration. | Environmental Services Department, Utilities Department |
| Household Hazardous Waste and Used Motor Vehicle Fluids | Environmental Services Department, Solid Waste Department |
| MS4 Screening and Illicit Discharge Inspections | Environmental Services Department |
| Priority Areas | Environmental Services Department |
| NPDES and TPDES Permittee List | Environmental Services Department, Building Services Department |
| MS4 Mapping | Building Services Department |
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| **MCM 4 Pollution Prevention and Good Housekeeping Program** | |
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| Waste Handling | Various City Departments |
| Pesticide, Herbicide, and Fertilizer Application | Environmental Services Department, Parks and Recreation Department |
| List of Municipal Facilities | Environmental Services Department |
| **MCM 5 Industrial and High Risk Runoff** | |
| Programs to identify and control pollutants in stormwater discharges | Environmental Services Department, Solid Waste Department |
| **MCM 6 Construction Site Stormwater Runoff** | |
| Program to reduce discharges of pollutants into the MS4 from construction sites. | Environmental Services Department, Engineering Department, and Building Services Department |
| Lists of Sites | Building Services Department |
| Construction Site Inspections | Building Services Department |
| **MCM 7 Public Education, Outreach, Involvement, and Participation** | |
| Public Education and Outreach | Environmental Services, Solid Waste Department |
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| **MCM 8 Monitoring, Evaluating, and Reporting** | |
| Dry Weather Screening Program | Environmental Services Department |
| Wet Weather Screening Program | Environmental Services Department |
| Industrial and High Risk Runoff Monitoring Program | Environmental Services, Solid Waste Department |
| Storm Event Discharge Monitoring | Environmental Services Department |
| Floatables Monitoring | Environmental Services Department |
| Impaired Water Bodies and TMDL requirements | Environmental Services Department |

# MCM 1 MS4 Maintenance Activities

## Structural Controls

Where a subdivision is traversed by a water course, drainage easement, channel, or stream, specifications and designs for storm drainage improvements shall be provided to the City, according to the document titled “Specifications and Design Standards for Storm Drainage Improvements,” adopted by the City Council of the City of Laredo as an official subdivision regulation.

The purposes of the storm drainage standards are: 1) to establish policies governing storm drainage facilities within the City Limits of the City of Laredo and its extraterritorial jurisdiction; and 2) to protect the general health, safety, and welfare of the public by reducing flooding potentialities, controlling excessive runoff, minimizing erosion, providing for maintenance, addressing siltation problems, and eliminating damage to public facilities resulting from uncontrolled storm water runoff.

As a general requirement for any property involved in the platting process, the owner/developer is to provide, at his expense, a preliminary drainage study of the area proposed for development. The City Engineer or his authorized designee may specifically exempt in writing plats that have previously approved drainage studies, or amended plats. The study shall include the following:

- Existing topography shown by contour lines.
- Existing and proposed drainage facilities both on-site and on adjacent affected properties.
- The scale shall not be smaller than one inch (1”) = two hundred feet (200’).
- Sufficient design calculations showing preliminary sizes of drainage facilities and easement sizes and locations.

Requirements for completed final plans are as follows:

- The developer and his engineer shall be responsible for the accuracy of the information furnished in the design of the storm drainage facilities, pertaining to both the development site in question (on-site) and affected (off-site) properties.
- All drainage easements, both within the subdivision and off-site, shall be dedicated to the City of Laredo if constructed in conformance with city standards. If not designed to city standards, the developer has the option to construct and maintain.
- A general location map of the subdivision showing the entire watershed shall be provided.
- Calculations showing the anticipated storm water flow computed on the basis of ultimate development of the entire watershed area, percent runoff, and time of the concentrations shall be provided.
- Calculations shall be submitted based on 10-year and 25-year frequency design.
- When a drainage channel or storm sewer is proposed, calculations on design and complete plans and specifications shall be submitted showing complete construction details.
- When conditions downstream from a proposed channel or storm sewer cannot handle maximum design flow, high water surface elevations based on a 25-year frequency shall be indicated based on existing conditions.

- Compliance with Federal Emergency Management Agency "FEMA" regulations is mandatory.
- Compliance with the Green Space Ordinance.

Drainage facilities covered by the ordinance are streets, conventional systems (*e.g.*, enclosed underground structures), reinforced concrete-lined open channels, combination earthen/concrete channels, and natural creeks/streams.

The storm drainage improvements and maintenance requirements for subdivisions were passed and approved by the City Council on June 28, 1999, and the ordinance was amended in 2012 to comply with the "one (1) acre or more" requirement.

The City Engineer and his staff are involved with reviewing, approving, and inspecting new public improvement projects and subdivision developments to ensure that the projects are constructed according to plans and specifications and that construction is in accordance with adopted city standards.

The subdivision ordinance document, "Specifications and Design Standards for Storm Drainage Improvements and Maintenance," has reduced the risk of flooding during large magnitude storm events in new subdivisions around the City.

**Structural Controls**

Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Review of Drainage Plans for Subdivisions | Bi-monthly (twice per month) review | Reviews start immediately and are reported December 2020 and then annually | Environmental Services Department, Engineering Department |

## Floatables

In an effort to decrease the amount of pollutants flowing into the Rio Grande, the City has implemented an inlet/manhole/outfall/storm water sewer lines cleaning program. The storm water main and lateral line conditions are first inspected by utilizing a CCTV Audio/Video recording Pole Camera, and for larger area distances, a specialized van loaded with a CCTV Electro/Mechanically controlled robot and a computerized recording system. The program will decrease pollutants that may reach and contaminate our watershed, will make current problem area locations easier to detect, will help control foul odors and make the area more aesthetically pleasing, will help minimize the potential for street flooding caused by volume capacity reduction obstructions, and will help make sites safer for dry-weather screening.

The program will be designed in a systematic fashion so that all locations will receive attention in an expedient manner. The crew will thoroughly clean the main and lateral storm sewer lines, inlets, manholes, and outfalls in the specified areas on a daily basis. All the information pertaining to the inlets, manholes, and outfalls will be recorded and reported as the actual number of them that are actually maintained. On the other hand, the amount of main and lateral

storm water sewer lines CCTV inspected, flushed, and vacuumed, will be recorded and reported in linear feet.

The Environmental Services Department will be responsible for the cleaning of all inlets, manholes, and outfalls and sewer lines on a scheduled basis. Thus a major duty of this crew is to clean the inlets, manholes, and outfalls. The goal of this program is to clean all the inlets, manholes, and outfalls at least once a year. It is anticipated that an average of 20 to 30 manholes, inlets, and outfalls can be cleaned on a single working day.

The proposed goal for the minimum amount of storm sewer lines cleaned will be 20,000 linear feet per month. The proposed goal for the minimum amount of storm sewer lines CCTV inspected will be 2,000 linear feet per month. The mud and trash collected from the sewer system will be properly collected, transported, and disposed at the local city landfill. This mud/trash collected will be weighted, recorded and reported in pounds and/or tonnage collected.

The criteria used to establish priorities for inspection and cleaning include: amount of trash accumulation in specific land use areas, which have heavy traffic and are highly visible commercial/business/industrial areas; new development storm water infrastructure warranty expiration deadline in which ownership and maintenance responsibility is transferred to the city after a two year period from the end of development completion; and an existing older subdivision inspection/cleaning rotation program.

Additionally, along with the City picking up trash twice per day in the downtown area the City has implemented a Commercial Litter Prevention Ordinance that deals with litter generated at commercial shopping centers. The City will conduct inspections of commercial centers multiple times a year to assure compliance.

Finally, the City has installed structural controls at Bustamante and one at Guerrero. These structural controls will be cleaned monthly.

**Floatables**

Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Cleaning of MS4 by Vacuum Truck (20,000 LF per month) | Weekly | Starts immediately and reported December 2020 and then annually | Environmental Services Department |
| Commercial Litter Ordinance Inspections | Bi-yearly (twice per year) | Starts immediately and reported December 2020 and then annually | Environmental Services Department |
| CCTV Inspection of MS4 | Weekly | Starts immediately and reported December 2020 and then annually | Environmental Services Department |
| Cleaning of Structural Controls (Guerrero & Bustamante) | Monthly | Starts immediately and reported December 2020 and | Environmental Services Department |

| | | | |
|---|---|---|---|
| | | then annually | |

## Roadways

In order to improve driving conditions and reduce pollutants entering the MS4 from un-maintained streets, a street maintenance program was developed. This program is intended to keep the state of the local streets in superior condition.

This program has been in effect for the repair and maintenance of city streets for transportation purposes for many years. However, the program is now also utilized to decrease pollutants entering the MS4 and the associated storm water. This program utilizes eighteen (18) street sweepers that maintain the City streets, concentrating on the major through fares within the City. Major streets are cleaned at least once per week, with problem areas such as downtown cleaned on a daily basis.

This program also involves pothole repair, which utilizes seven (7) pothole-patching trucks that respond to citizen complaints as well as patrol the City for problem areas.

Any city employee involved in street asphalt breaking in order to repair underground infrastructure has been and will continue to be trained to apply BMPs during such activities, such as covering and containing piles of dirt and/or trash in order to prevent or minimize the possibility of storm water runoff traveling down the street curves and running into storm inlets, creeks, channels, and/or any other MS4 structure. After finishing, covering the hole, and replacing the asphalt/concrete, the area will be cleaned up and any leftover dirt and/or trash will be removed and disposed appropriately.

**Roadways**

Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Street Sweeping | Weekly | Starts immediately and reported December 2020 and then annually | Public Works Department |

# MCM 2 Post-Construction Storm Water Control Measures

## Implementation and Enforcement of Controls to minimize discharge of pollutants from areas of new development and significant redevelopment

In June 1999, the City of Laredo adopted its storm water ordinance (Ordinance No. 99-O-186) which was amended in 2012 to include one (1) acre or more sites to protect, maintain, and enhance the public health, safety, and general welfare by establishing minimum requirements and procedures to control the adverse impacts associated with storm water runoff. Proper management of storm water runoff will minimize damage to public and private property, reduce

the effects of development on land and stream channel erosion, assist in the attainment and maintenance of water quality standards, reduce local flooding, and maintain after development, as nearly as possible, the pre-development runoff characteristics. The City's storm water ordinance and the related guidance document address BMPs that will be used in areas of new development and significant redevelopment. The ordinance requires the developer to sign a standard maintenance and monitoring agreement "MMA" for any storm water facilities and BMPs constructed as part of the development process.

The Storm Water Management Ordinance requires that a storm water management permit be obtained from theCity for all land disturbances of one (1) or more acres. The permit requires Storm Water Pollution Prevention Plans "SWPPPs" for proposed major construction, minor construction, street/road construction, and trenching and filling projects. Inspections of construction sites for compliance are also covered by the ordinance.

Additionally, each permit requires the following:

- Completion of the City's standard Storm Water Pollution Prevention "SWPP" permit application form which includes a Storm Water Pollution Prevention Plan "SWPPP".
- Site, vicinity, contour, and drainage map.
- Erosion control plans, methods and practices, as part of the SWPPP.
- Work schedule.
- Application process fee.
- A copy of the TPDES storm water discharge Notice of Intent "NOI" application and the approved permit, if the site is one (1) acres or more.
- Estimates, in dollar amount, to develop and implement this permit requirement.

All engineering consultants, and/or developers involved in the planning and/or clearing of 1 or more acres of land for the purpose of constructing residential, commercial, or industrial developments are required to prepare and distribute to all contractors and subcontractors involved a copy of the SWPPP, which is specific for the proper storage and handling of construction hazardous materials, the proper construction or placement of project site operational and practical erosion and run-off prevention controls, and the proper implementation of any other required SWPPP BMPs at the project area. The SWPPP should also describe the need for the developer to obtain storm water discharge permit coverage from TCEQ through the submission of a NOI. In addition, the SWPPP should include the name of the General Project Manager, his/her responsibilities, and the construction site self-inspection check list or evaluation, which the project manager should conduct in order to make sure the construction site meets all local and state storm water regulations and stays in compliance.

During construction, City Inspectors visit the construction sites routinely inspected for compliance with the SWPPP and to inspect BMPs for effectiveness. Inspectors may issue citations for non-compliance to ensure the reduction of sediments from erosion entering the MS4.

Upon final inspection of construction sites residential sites must provide a two (2) year warranty where the Developer is responsible for the maintenance of structural control BMPs. After those two years the City is responsible for maintaining the BMPs through the Public Works Creek Cleaning Division. On commercial sites, the City requires a Maintenance and Monitoring Agreement "MMA" for the long-term maintenance of BMPs.

Environmental Services inspectors visit all public and private Structural Controls/BMPs at least once per year to assure compliance with maintenance schedules. Moreover, the City will assess receiving water bodies for the effectiveness of these controls and take corrective actions through improvements (for public facilities) or require private facilities to take corrective actions through the enforcement of the MMA.

**Post-Construction Storm Water Control Measures**

Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Review of Master Plans, Development Plans, and SWPPPs | Bi-Monthly (twice per month) | Starts immediately and reported December 2020 and then annually | Building Services Department, Engineering Department, Environmental Services Department |
| Inspections of Construction Sites | Weekly | Starts immediately and reported December 2020 and then annually | Building Services Department |
| Inspection of Flood Control Structures | Once per year | Starts immediately and reported December 2020 and then annually | Environmental Services Department, Engineering Department, Building Services Department |
| Assessment of Impacts on Receiving Waters | Once per year | Starts immediately and reported December 2020 and then annually | Environmental Services Department, Engineering Department, Building Services Department |
| Cleaning and Maintenance of Structural Controls | Monthly | Starts immediately and reported December 2020 and then annually | Public Works Department, Environmental Services Department |

## MCM 3 Illicit Discharge Detection and Elimination

### Prohibition of illicit non-storm water discharges from entering the MS4

The City has two main ordinances that prohibit illicit non-storm water discharges from entering the MS4: the Water Pollution Prevention Ordinance and the Illegal Dumping Ordinance. The Environmental Services Department has four (4) full time staff to investigate and enforce cases involving illicit non-storm water discharges. These staff members are responsible for routine inspections of industrial storm water permits, mechanic shop inspections, as well as hazardous materials permit inspections. Moreover, these staff members respond to and investigate 311 calls from the public regarding cases of illicit discharges and illegal dumping. The enforcement staff works closely with Environmental Services staff that conduct dry-weather and wet-weather

screening as well as with staff that utilize CCTV to inspect the MS4 for illicit discharges from illegal connections.

**Prohibition of illicit non-storm water discharges**
Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Citizen Complaints via 311 | Weekly | Starts immediately and reported December 2020 and then annually | Environmental Services Department |
| Dry weather screening | 20% of the MS4 per year | 20% each year to be reported in December 2020 and then annually | Environmental Services Department |
| Wet weather screening in four (4) watersheds | Bi-annually (twice per year) | Starts immediately and reported December 2020 and then annually | Environmental Services Department |
| Inspections of Hazardous Material Permittees | Inspection of permittees quarterly | Starts immediately and reported December 2020 and then annually | Environmental Services Department |
| High Risk Industrial Storm Water Inspections | Three (3) times per year | Will be inspected once prior to October 15, 2020, and then annually | Environmental Services Department |

## Miscellaneous, non-storm water discharges that are authorized

The City has an online non-storm water discharge permit process where the following allowable discharges can be reported so that staff can review and follow up:

A) water line flushing;
B) landscape irrigation;
C) diverted stream flows;
D) rising ground waters;
E) uncontaminated ground water infiltration;
F) uncontaminated pumped ground water;
G) discharges from potable water sources;
H) foundation drains;
I) air conditioning condensation;
J) irrigation water;
K) springs;
L) water from crawl space pumps;
M) footing drains;
N) lawn watering;
0) street wash water;
P) individual residential vehicle washing;
Q) wash waters using only potable water, and which are similar in quality and character to street wash water or individual residential

vehicle washing but without the use of detergents or surfactants;
R) flows from riparian habitats and wetlands;
S) dechlorinated swimming pool discharges;
T) other allowable non-storm water discharges listed in 40 CFR § 122.26( d)( 2 )(iv *)(B)(1);*
U) other allowable non-storm water discharges listed in the TPDES Construction General Permit No. TXR150000 and TPDES MultiSector General Permit No. TXR050000; and
V) other similar occasional incidental non-storm water discharges

If discharges from fire-fighting activities are identified as significant sources of pollutants the City of Laredo will notify TCEQ within 24 hours. Moreover, if an individual non-storm water discharge otherwise exempted under this section is found to be contributing significant amounts of pollutants to the MS4 the City will take enforcement actions under the City's Water Pollution Prevention Ordinance.

## Overflows and Infiltration

Wastewater overflow in collection systems occurs predominantly due to obstructions in lines that limit the carrying capacity of the line. Some overflows are also the direct result of excessive flows due to demand and usage of an inadequate pipe size or due to the fact that rain infiltrates through cracks and faulty gaskets creating a demand, which supersedes the capacity of the line. In areas where septic tanks are prevalent, they usually overflow during prolonged periods of persistent rain. Finally, a corroded or cracked pipe can leak to the surrounding areas during periods of high flow. Overflowing wastewater generally ends up in the storm water system where it stays until a significant rain event flushes the pipes.

The City has experienced overflows due to obstructions, which overwhelms the system's capacity. The overflows have primarily occurred as a consequence of grease, paper, rags, wipes and other incidental objects that fall in or are maliciously introduced into the lines. Also, roots in the lines are occasionally the cause of sewage backups or manhole overflows. The older sections of town, including the downtown area, are suspected to have a number of illegal connections to the storm sewers, since they are usually found to have a strong sewer odor within a given area.

The City has responded to these problems by undertaking an ambitious lift station overhaul program, acquiring an additional vacuum truck for maintenance tasks, developing an inspection and enforcement program for restaurants, schools, and other grease generators, and by selecting stricter standards for construction materials in the collection system. Presently, a sewage overflow is immediately vacuumed and removed or disinfected with granular chlorine on its route to the storm sewer.

In order to minimize the number of wastewater overflows, the City provides the following:

- Grease Control – Continued inspections of food preparation establishments for proper grease trap capacity and maintenance.
- Line Obstructions – A vacuum truck will be assigned exclusively to preventative maintenance of lines in the areas where historic data shows recurring problems.

- Line Maintenance Information Management – The existing computerized database will be refined to incorporate tasks that will allow the department to issue work orders upon certain frequency of events.
- The Utilities Department conducts a citywide educational campaign, utilizing all conventional types of media (TV, Radio, Bill Boards, Utilities Billing Mail, etc.), issuing educational pamphlets at local schools, and utilizing any electronic social media available to the City, in order to inform the public in general about the proper disposal alternatives for waste cooking grease, used wipes, and other items usually thrown in the sinks and toilets. The Utilities Department will also be giving out special grease disposal bags to the public.

In the event of a wastewater overflow, the Utilities Department Wastewater Collection Division will dispatch a vacuum truck to collect as much of the spill as possible, then a crew equipped with granular chlorine will apply it to the storm water inlet in an amount proportional to the perceived spill. Laboratory data will be generated to determine an appropriate ratio of chlorine to sewage. The chlorine applied is used to minimize coliform count and reach acceptable levels for discharge while not exceeding the chlorine amount that can be placed in the receiving stream. Simultaneously, the Environmental Services Department field investigators will be notified via a 24-hour hot line for an immediate assessment of the volume and type of discharge being discharged into the storm sewer. The investigators then will determine whether additional remediation actions are necessary.

The City's Utilities Department utilizes several crews to operate vacuum trucks and these are available on a 24 hour/7 day schedule. The Utilities Department also has crews that conduct CCTV inspections as well as smoke and/or dye tests on wastewater lines to identify leaks or illegal connections in the system.

In identifying infiltration to the MS4, the Environmental Services Department utilizes a CCTV inspection system to inspect our MS4 for infiltration from sanitary sewer lines as well as illicit connections. This is done on existing lines and on areas of new development to ensure that there are no defects in areas of new development before the City accepts a new subdivision.

**Overflows and Infiltration**

Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| CCTV Inspection of MS4 | Weekly | Starts immediately and reported December 2020 and then annually | Environmental Services Department |
| Cleaning of Sanitary Lines by Vacuum Trucks | Weekly | Starts immediately and reported December 2020 and then annually | Utilities Department |
| Inspection of Sanitary Lines | Weekly | Starts immediately and reported December 2020 and then annually | Utilities Department |

## Household Hazardous Waste and Used Motor Vehicle Fluids

In an effort to decrease the risk of contaminating storm water and surface water, the City has developed a community-based household hazardous waste "HHW" collection and education program aimed at increasing community awareness and participation in proper disposal of HHW. This program is intended to provide education on HHW through a mass media campaign, as well as to conduct biannual HHW collection events in addition to maintaining a permanent Household Hazardous Waste Collection Facility "HHWCF".

In order to deal with HHW generated by the citizens of Laredo, the Environmental Services Department has implemented a HHW Collection Program, which includes a permanent residential hazardous waste drop-off facility as well as a couple of collection events per year that take place in the spring and fall. This program has been extremely effective in reducing the improper disposal of HHW. Over the years, the Environmental Services Department has sustained a gradual increase in cost to support this successful program by faithfully budgeting the accounts that sustain the transportation and disposal fees involved in running this program. Part of the budget is dedicated for education and awareness campaigns for the program. The program has collected and properly recycled, reused, and disposed of over a million pounds of HHW materials since the program's inception.

Due to its tremendous success, the Environmental Services Department proudly supports and grows this program and will continue to host biannual collection events as well as continue operations at the permanent facility.

In an effort to reduce the hazards of storm water and surface water contamination by the indiscriminate dumping of used oil, a used oil recycling program was established in the City of Laredo. This project implemented a community-wide oil recycling system and an educational program directed at increasing community knowledge and participation in the used oil recycling program. This program has been in place since May 1994.

The used oil recycling program consists of neighborhood drop-off stations throughout the City. The City has acquired four (4) 450-gallon neighborhood collection bins for placement in neighborhoods throughout the City, one trailer and collection tank to pick up used oil from the neighborhood collection sites, and a central collection tank located at the Department of Public Works to act as the primary collection facility. The used oil is received by a contracted oil recycling company, which is responsible for analyzing for contaminants, recycling, and/or proper disposal. The Recycling Coordinator provides community education at local schools (as part of presentations on recycling) and on the City's Public Access TV channel. Also, literature on oil recycling is distributed at community and school events, along with free individual spill resistant oil change receptacles.

The City currently accepts used oil at various locations distributed throughout the City, using the neighborhood collection bins. Currently, the neighborhood collection bins are found at the following locations:

**City of Laredo Landfill**
2 miles East of the Intersection of HWY 359 & Loop 20 on Hwy 359

**Fire Station #3 (Civic Center)**
2420 San Bernardo Avenue

**Fire Station # 9**
11700 Mines Rd.

**Department of Public Works**
5512 Daughtery

**Household Hazardous Waste and Used Motor Vehicle Fluids**
Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Operation of the Household Hazardous Waste Collection Center | Advertisement Twice per year in print and television media. Social media advertisement four times per year. Information on collection center available on the environmental services website and solid waste website. | Starts immediately and reported December 2020 and then annually | Environmental Services, Public Information Office, and Solid Waste Department. |
| Maintenance of Used Oil Recycling Centers | Weekly | Starts immediately and reported December 2020 and then annually | Solid Waste Department |

## MS4 Screening and Illicit Discharge Inspections

The MS4 screening program consists of developing a map of the Storm Sewer System for the City of Laredo, locating all storm water outfalls, including major outfalls, and choosing representative field screening points which will attempt to cover 100% screening. The task of sampling all the storm water outfalls will be divided into five (5) annual screening projects of 20% per year. A study on dry weather flow will be performed by collecting samples for laboratory analysis and drawing conclusions on the basis of field and laboratory results. Based on each year's laboratory test results, the environmental technicians will gradually add the task of resampling those outfalls suspected of having illicit discharges to the 20% storm water outfall screening project for that particular year.

A team of technicians will be assigned the task of selecting the outfalls to be tested, taking grab samples from the outfalls, transporting the samples to our headquarters, and performing the corresponding storm water outfall screening tests. Selection of the outfalls to be sampled will be based on the existing numeric identification system of the outfalls. A CHEMetrics™ analysis kit equipped with specific ampoules will be utilized for the analysis of ammonia, total chlorine, total copper, detergents, and total phenols. Also, an Orion M1230 microprocessor based multiprobe meter will be utilized to measure pH, conductivity, temperature, dissolved oxygen (DO), and salinity. Finally, a Quanti-Tray / 2000 with Colisure Test will be utilized to estimate *E. coli* numbers. The designated technicians will follow all necessary QA/QC measures. The dry weather screening schedule is devised to increase productivity by having technicians attend outfall locations in close proximity to one another on a regular basis. The program will be conducted in specific months of every year. All samples will be collected after at least a 72-hour period of dryness between storm events.

As previously mentioned, the Environmental Services Department conducts CCTV inspections on the MS4 to identify illicit discharges weekly.

**MS4 Screening and Illicit Discharge Inspections**
Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Dry Weather Inspections | 20% of the MS4 per year | 20% each year to be reported in December 2020 and then annually | Environmental Services Department |

## Priority Areas

Within one year from the date of permit issuance, the City of Laredo will develop a list of priority areas likely to have illicit discharges. The City will continue to evaluate and update this list each year and report the results in the annual report.

**Priority Areas**
Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Priority Area List | Develop a priority area list within one year. Update list each year. | October 15, 2020 and then review and report annually | Environmental Services Department |

## NPDES and TPDES Permittee List

The Environmental Services Department maintains a list of NPDES and TPDES industrial permittees and the Building Services Department maintains a list of NPDES and TPDES construction permittees. These are updated as needed or on a monthly basis.

**NPDES and TPDES Permittee List**
Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| NPDES and TPDES Permittee List | Update list monthly | Starts immediately and reported December 2020 and then annually | Environmental Services Department, Building Services Department |

## MS4 Mapping

The Environmental Services Department utilizes various technologies and equipment to prevent contaminants from entering the MS4. To address the prevention of contaminants as well as implementing the Department's programs, the "what," "where," "when," and "how many"

questions are regularly answered by the development and use of the City's storm water Geographical Information System (GIS).

The primary use of the Department's GIS has been for the storm water management program. Every year, the department conducts storm water screening and monitoring activities at numerous locations where water exits the man-made portion of the MS4 and enters the natural environment of creeks and the Rio Grande. Database development is supported through the use of GPS (Global Positioning System) technology, drainage project as-builts, and storm system sub-surface camera investigations.

In 2010, in an effort to consolidate resources and to better serve internal and external clients, storm water GIS personnel and equipment were relocated from the Environmental Services Department to the City's Building Department.

The Building Services Department will update the GIS system monthly to reflect additions to the MS4. This is done by requiring as-builts for newly completed development and field inspections. Older data is updated when information is obtained by CCTV inspections and camera pole inspections.

**MS4 Mapping**

Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| MS4 Mapping | GIS system will be updated monthly | Starts immediately and reported December 2020 and then annually | Building Services Department |

## Spill Prevention and Response

An internal municipal storm water pollution prevention program has been implemented in order to train city employees who work within specific city departments that have a higher chance of having accidental chemical spills, which in turn may run off to the local MS4 and potentially pollute the City's main waterways. Some of these departments include Public Works, Utilities, Solid Waste, Fleet, and the Parks & Recreation Departments. The program includes having Environmental Services Department personnel conduct regular employee trainings at each of the identified departments in order to teach or refresh the employees on the most current BMPs available. Such BMPs include good housekeeping, spill prevention and response techniques, proper vehicle and equipment washing and maintenance techniques, proper spill reporting, MS4 protecting street maintenance techniques, pollution preventing outdoor storage of materials and wastes, and non-polluting landscaping and lawn care techniques.

Moreover, the City of Laredo Fire Department is responsible for the management and cleanup of hazardous material spills that pose an imminent threat to life or property or where permitted hazardous materials are involved. The Fire Department follows standard operating procedures when responding to spill situations. If the spill is located on private property, hired contractors will clean up and dispose of the spill material accordingly; however, if the spill occurs on the right-of-way, the Fire Department will properly clean up and dispose of the spill waste material.

In addition to ensuring that the private contractor or fire department pill clean-up crews contain, clean up, and properly dispose of the collected spilled waste material, the Environmental Services Department may assists with advice or physically applying pollutant containment BMPs in order to prevent the pollutant from running down into storm inlets, channels, creeks, etc. . Additionally, the City has implemented a program to deal with hazardous waste generated and stored by conditionally-exempt small quantity generators ("CESQGs") and small businesses. This program has been in existence since 1999 and over the years, the City has assisted with the proper collection and disposal of a significantly large amount of hazardous waste from CESQG generators. Furthermore, through the Hazardous Materials Permitting Division, the City has coordinated the proper disposal of thousands of pounds of hazardous abandoned material that had accumulated in many of the local warehouses. The City currently conducts quarterly training for hazardous materials handling and spill prevention and has trained a large number of people since 2001.

**Spill Prevention and Response**

Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Spill Prevention Training | Quarterly | Starts immediately and reported December 2020 and then annually | Various City Departments |
| Hazardous Materials Handling Training | Quarterly | Starts immediately and reported December 2020 and then annually | Environmental Services Department |
| Inspections of Hazardous Material Permittees | Inspection of permittees quarterly | Starts immediately and reported December 2020 and then annually | Environmental Services Department |
| CESQG Collection Program | Yearly | Starts immediately and reported December 2020 and then annually | Environmental Services Department |

## MCM 4 Pollution Prevention and Good Housekeeping Program

## Pollution Prevention and Good Housekeeping

The City has identified various City activities that could potentially affect the MS4 and has expedited activities to prevent pollution impacts to the MS4. The City conducts:

- Street Sweeping for City construction projects, in addition to an annual schedule for City-wide sweeping;
- Right of way mowing and mowed grass collection and removal;
- Storm system maintenance and cleaning, including detention facilities, on site detention ponds, and outfalls;
- City owned creeks and channels maintenance by City personnel and/or contractors;

- Commercially or Privately owned creeks and channels maintenance scheduled inspections by City personnel to make sure private owners perform their contract agreed maintenance duties.
- Parks cleaning/mowing maintenance and regular emptying of trash disposal container dispensability at all parks;
- Special Pet waste disposal containers maintenance and continual replacement of collection bags at City parks;
- Integrated Pest Management (IPM) plan development at parks and other city owned open space areas;
- As part of the IPM plan, any private contracted commercial applicator shall have to follow all pesticide, herbicide, and fertilizer application rules in city property;
- Proper collection and disposal of accumulated storm water runoff waste;
- Landfill erosion and solid waste control maintenance;
- Municipal curbside solid waste activities;
- Wastewater and water treatment facility storm water protection operations;
- Operation and maintenance of lift stations.
- Implementation of training and BMPs to reduce pollutants from equipment yards (sand filters at Public Works), road repair activities, and maintenance facilities.

In addition to these identified activities, the City has developed a Storm Water Protection Guidance Manual for public and private projects

In general, the City's programs to operate and maintain City owned structural and non-structural BMPs, as outlined in this SWMP, have been and continue to be fully implemented.

Moreover, the City has implemented training programs that include employee training with the ultimate goal of preventing or reducing pollutant runoff from municipal operations. Training Programs inform public employees of the impacts associated with illegal discharges and improper disposal of waste from municipal operations.

The Environmental Services Department provides an annual storm water pollution prevention BMPs and good housekeeping techniques training for City employees who work on departments which perform mechanical maintenance work in City vehicles, handle and/or store potential polluting materials on their yards, and/or operate a significantly large fleet of regular or large/heavy vehicles. Such City departments include Fire, Utilities, Public Works, Police, Fleet Maintenance, Parks & Recreation, and Health.

In order to minimize excessive pesticide application and/or over fertilization of public green areas, which may contribute to run off pollution of our waterways, the Parks Department with collaboration of Environmental Services Department personnel will continue to provide proper pesticide and fertilizer application trainings to any City employee and/or contracted individuals who apply pest control and plant growth materials on any public green areas. These techniques include focused BMPs, following label requirements, avoiding/minimizing the use of extremely hazardous pesticides, and utilizing non-pesticide application techniques whenever possible.

The Utilities and Public Works departments, with cooperation from the Environmental Services Department, will continue to train their personnel on how to best apply storm water pollution runoff prevention BMPs whenever they have to conduct fixing or maintenance work on any part of the MS4.

Overall, through the City's compliance with Phase I of the NPDES/TPDES regulations, training of City personnel is conducted by individual departments and emphasizes prevention and reduction of pollutant runoff from municipal operations.

Finally, the City is currently implementing a program for structural control maintenance where the City inspects all public and private facilities and is requiring a maintenance schedule for these facilities. The City will enforce these maintenance schedules on privately owned facilities through Maintenance and Monitoring Agreements (MMA). This program will be fully implemented within one year of the issuance of the City's permit.

**Pollution Prevention and Good Housekeeping**

Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Street sweeping | Weekly | Starts immediately and reported December 2020 and then annually | Public Works Department |
| Right-of-Way Mowing | Weekly | Starts immediately and reported December 2020 and then annually | Public Works Department |
| Inspection of Privately-owned Facilities to Ensure Maintenance | Inspections will be conducted once per year | All inspections will be completed by October 15, 2020, and then annually thereafter | Environmental Services Department |
| Parks Cleaning/Mowing and Removal of Trash | Daily | Starts immediately and reported December 2020 and then annually | Parks and Recreation Department |
| Pet waste disposal containers maintenance | Weekly | Starts immediately and reported December 2020 and then annually | Parks and Recreation Department |
| Integrated Pest Management ("IPM") plan development and review | Develop an IPM plan within one year. Review yearly. | IPM plan will be developed by October 15, 2020. Reviewed annually thereafter. | Parks and Recreation Department |
| Collection of municipal trash | Weekly | Starts immediately and reported December 2020 and then annually | Solid Waste Department |
| Landfill erosion and solid waste control maintenance | Weekly | Starts immediately and reported December 2020 and then annually | Solid Waste Department |
| Maintenance of lift stations | Weekly | Starts immediately and reported | Solid Waste Department |

| | | | |
|---|---|---|---|
| | | December 2020 and then annually | |
| Training of Employees | Quarterly training will be provided | First training will be held prior to October 15, 2020, and then quarterly thereafter | Environmental Services Department, Solid Waste Department, Utilities Department, Parks and Recreation Department, Public Works Department, Fleet Department |

## Waste Handling

Sediment and floatables collected through the implementation of MS4 maintenance BMPs are disposed of properly. Waste materials collected are weighed and disposed of at the City's permitted landfill. Any automotive fluids, e.g., oil or antifreeze, collected through vehicle maintenance operations are disposed of through contracted services.

Overall, through the City's compliance with Phase I of the NPDES/TPDES regulations, waste disposal from maintenance of the City MS4 and other municipal activities is completed in accordance to applicable waste regulations.

**Waste Handling**

Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Weighing of waste materials removed from the MS4 and disposed at the City's permitted MSW landfill | Weekly | Starts immediately and reported December 2020 and then annually | Environmental Services Department, Public Works Department |

## Pesticide, Herbicide, and Fertilizer Application

Certain water quality problems can be traced to pollutants associated with pesticides, herbicides, and fertilizers "PHFs". Pesticides and herbicides in storm water runoff can degrade water quality and often have a toxic effect on sensitive organisms even at very low concentrations. Fertilizers are also capable of degrading water quality. Excessive phosphates, nitrates and other nutrients in water bodies may create a eutrophic condition, which may lead to an excessive growth of microscopic organisms, such as algae, which in turn leads to excessive oxygen consumption required to sustain their growth, which in turn reduces dissolved oxygen levels (anoxic condition) necessary to sustain aquatic life.

Manufacturers of pesticides conduct extensive research in developing the optimum pesticide dosage and application conditions to minimize the environmental impact. By law, pesticides must contain the manufacturer's directions for use. Compliance with application directions is the critical condition for effectively controlling pesticides. Application is almost exclusively under

human control and rarely, if ever, automated. Hence, regardless of how diligent a manufacturer is in formulating and communicating usage instructions, the release of pesticides outside of any given target area is likely if the instructions are not read/learned and followed. This applies to all users including homeowners, professional applicators, and municipal employees.

Hence, the key element in controlling the release of PHFs into the storm water system is to ensure, to the maximum extent possible, that applicators have sufficient knowledge of their proper use. Basically, the means of instruction falls into two categories: public education and licensing programs, both of which are part of a good Integrated PHF Management Program. A well-Integrated PHF Management program follows an approach which evaluates different control options for the regulation of weed growth, horticultural diseases, insects and others. PHF Management is based on effectiveness, environmental impact, site characteristics, economics and worker/public health and safety. Control options include biological, cultural, manual, mechanical and chemical methods to prevent, or remedy unacceptable pest activity or damage. A PHF Management Program utilizes all appropriate pest management options. The goal of a PHF Management system is to manage pests and the environment to balance benefits of control, costs, public health, and environmental quality.

The PHF Management Program is currently being administered by the Parks and Recreation Department in collaboration with the Public Works, Health, and Environmental Services Departments.

The purpose of a PHF Management Program is to efficiently and effectively protect lives, property, and the environment of our community by reducing the impact of flooding, erosion and water pollution potentially caused by the runoff of different types of pollutants including PHFs which may enter the City's MS4 and ultimately into the watershed receiving waters. The IPM Program also assists our City in maintaining compliance with state and federal rules regarding the application of pesticides (including herbicides, insecticides fungicides, and rodenticides on City property. This IPM program will be implemented within one year of the issuance of our permit.

Additionally, the City will develop an Integrated Pest Management (IPM) within one year of our permit issuance where all new commercial development will need to submit an Integrated Pest Management Plan as part of their Maintenance and Monitoring Agreements (MMA). This will discharge pollutants over lands not owned by the City of Laredo.

**Pesticide, Herbicide and Fertilizer Application**

Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Integrated Pest Management ("IPM") plan development and review | Develop an IPM plan within one year. Review yearly. | IPM plan will be developed by October 15, 2020. Reviewed annually thereafter. | Parks and Recreation Department |

## List of Municipal Facilities

The City's Zacate Creek Waste Water Treatment Plant(WQ0010681002), Southside Waste

Water Treatment Plant (WQ0010681003), North Laredo Waste Water Treatment Plant (WQ0010681004), Colombia Waste Water Treatment Plant(WQ0010681006), Jefferson Water Treatment Plant(WQ0010681001), Penitas Waste Water Treatment Plant (WQ0010681007), Sombreretillo Waste Water Treatment Plant (WQ0010681008), and Unitec Waste Water Treatment Plant(WQ0010681005) are permitted and remain in compliance. Additional permitted facilities are the Laredo MSW Landfill(TXR05DC19), which remains in compliance.

## MCM 5 Industrial and High Risk Runoff

## Programs to identify and control pollutants in storm water discharges

## Industrial Storm water Compliance Program

The City has implemented a compliance program for the monitoring and compliance of industries within the City of Laredo by passage of a city ordinance. The City of Laredo initiated an education campaign targeting industrial facilities and staff in an attempt to educate and inform industries of the necessity to comply with the former NPDES, now TPDES, required industrial storm water discharge permit, and advising them of the City Ordinances mandating compliance. Industrial facilities must prepare a comprehensive Storm Water Pollution Prevention Plan “SWPPP”, which will facilitate the performance of all tasks necessary to comply with current TCEQ guidelines for storm water discharges. Industrial facilities which store/handle hazardous materials will also be required to comply with the City's Hazmat Ordinance.

Personnel from the Environmental Services Department will conduct site inspections of the facilities to identify if a Notice of Intent (NOI) has been submitted or a permit has been issued, and to determine compliance with the City Ordinances. The Environmental Services Department will also address any concerns and discuss possible options the facility owner(s) and staff might have. Industrial facilities will be prioritized according to their potential for pollution production and discharge. The Environmental Services Department will determine which facilities will be inspected more frequently according to their previous inspection records and the amount of pollution being discharged. Inspections will be unannounced and the Environmental Services Department inspectors will follow a standardized inspection sheet, which will cover all the necessary attributes for compliance. If a facility is found to be in non-compliance, the proprietor will be notified, given a Notice of Violation(s), and/or cited. The operator will further be required to initiate a remediation program within thirty (30) days and be in full compliance within sixty (60) days from the date of notification and/or citation or face further legal enforcement including severe fines.

A database of active industrial facilities will include a risk level value for each of the facilities. The risk level will consist of a simple three number system (1-3) with the number one (1) being low risk, the number two (2) being medium risk and the number three (3) being high risk. All number 3 risk level facilities will be inspected three (3) times per year.

Facilities with inadequate inspection results will be visited monthly until compliance is obtained and then two (2) to four (4) times yearly until analytical sampling and inspection results show continuous compliance for six (6) months, after which inspection intervals will revert back to yearly at a minimum. Additionally, the City shall review monitoring data submitted for facilities under any TPDES storm water permit, EPCRA Title III, Section 313 industrial facilities, and hazardous waste treatment, disposal, and recovery facilities. Sites under this designation will be inspected quarterly.

Any operator found to be in noncompliance will be required to submit a revised SWPPP which includes, at a minimum the following items:

| | |
|---|---|
| Pollution prevention team | Description of pollutant sources |
| Drainage area and calculations | Inventory of exposed materials |
| Spills and leaks | Sampling data |
| Risk identification | Summary of potential pollutant sources |
| Measures and controls | Good housekeeping requirements |
| Preventive maintenance | Spill prevention & response procedures |
| Internal inspections | Employee training |
| Non-storm water discharges | Record keeping and internal reporting |
| Sediment and erosion control | Management of runoff |

**Industrial Storm Water Compliance Program**

Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Inspections at MSW landfill for compliance with TPDES storm water permit | Once per year | Will be inspected once prior to October 15, 2020, and then annually | Environmental Services Department, Solid Waste Department |
| High Risk Industrial Storm Water Inspections | Three (3) times per year | Will be inspected once prior to October 15, 2020, and then annually | Environmental Services Department |
| Inspection of EPCRA Title III, Section 313 facilities | Quarterly | Will be inspected quarterly in each permit year | Environmental Services Department |
| Develop and maintain a list of active industrial facilities identified by risk level | Develop list by December 2020 and then update twice per year | List will be developed by December 2020 and then updated twice per year | Environmental Services Department |

## Landfill's Storm Water Discharge Monitoring Program

The City of Laredo owns and operates one (1) Type 1 municipal solid waste landfill, which is situated approximately 1.96 miles east of the LOOP 20 and SH-359 intersection. This 200-acre permitted landfill, TCEQ Permit No. MSW-1693A, has been in operation since 1986 and had an initial design lifespan of twenty (20) years. The City has received a permit amendment that will extend the lifespan of the landfill fifteen (15) years. The City developed a SWPPP in compliance with the requirements of the TPDES Multi-Sector General Permit (MSGP), TPDES Permit No. TXR050000, obtaining authorization No. TXR05DC19 effective December 12, 2006. The SWPPP and sampling activities at the City's MSW landfill are in compliance with the MSGP.

The City has implemented major modifications to comply with Subtitle D requirements, including a new cell liner, ground water monitoring wells, a leachate collection system, and erosion

control practices. The City of Laredo Environmental Department maintains compliance with the SWPPP.

**Landfill's Storm Water Discharge Monitoring Program**

Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Inspections at MSW landfill for compliance with TPDES storm water permit | Once per year | Will be inspected once prior to October 15, 2020, and then annually | Environmental Services Department, Solid Waste Department |

## MCM 6 Construction Site Storm Water Runoff

## Program to reduce discharges of pollutants into the MS4 from construction sites.

Reduction of pollutants such as sediment into the MS4 begins with the Subdivision Plat Approval process, where City staff reviews construction plans and reports for proposed public improvements of a submitted plat. The importance of the process is to assure Subdivisions meet all Local, State, and Federal Guidelines and Ordinances (such as the City's Storm Water Management Ordinance). Engineers representing the Subdivision are responsible in assuring that all required submittals such as Construction Plans, SWPPP, and Reports be presented to the One Stop Shop (OSS) Committee for review and approval. The OSS meets every two (2) weeks and reviews these plans to make sure that the proposed development meets all legal requirements. If deficiencies in the plans are found the consulting engineer of the subdivision or commercial site is notified and the process is not allowed to continue until an approval letter is issued by the City. Once all approval letters are issued the project is allowed to continue after a preliminary approval of the Planning and Zoning Commission is granted. Inspection staff are assigned to the project after this initial approval. The next step for a development is to file an NOI with the State and this NOI must be submitted to the City, and proof (followed up by an inspection) of the implementation of BMPs such as silt fencing, so that a Clearing and Grubbing Permit is issued. Afterwards, a pre-construction meeting is held with the developer and staff to review the project and discuss any issues with the development. As construction begins staff periodically visits the site to assure compliance with City engineering standards as well as to ensure storm water BMPs are maintained and functioning as designed. If deficiencies are observed, inspectors will require the developer to correct them. If deficiencies are not corrected, staff inspectors may issue Stop-Work-Orders or citations. Upon completion of the development, the City holds a pre-final construction meeting with the developer to inspect the site for compliance with City's engineering standards and storm water BMPs. If deficiencies are observed the developer is required to correct them and if compliance is not obtained the City will issue citations and/or not allow for the project to receive final plat recordation approval. A final plat recordation is needed in order to obtain a building permit from the Building Services Department. Once the development has finished and obtained plat recordation then individual builders must obtain building permits from the City. As part of this process, City inspectors, inspect the building site at various times to assure compliance with building standards as well as compliance with storm water regulations. Again, Stop-Work-Orders as well as citations may be issued to assure compliance. Finally, once the structure is complete the City will conduct a final

inspection to make sure the site is in compliance before a Certificate of Occupancy “CO” is issued. If the site is deficient in any building standard or storm water requirement, then the site will not be issued a CO.

To assure compliance and educate the development community, the City will offer SWPPP and BMP educational trainings for construction site operators as well as Engineers on an annual basis.

**Program to reduce discharges of pollutants into the MS4 from construction sites**
Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Review of construction plans (OSS) | Bi-monthly | Starts immediately and reported December 2020 and then annually | Building Services Department |
| Issuance of construction permits. | Bi-monthly | Starts immediately and reported December 2020 and then annually | Building Services Department, Engineering Department |
| Inspections of construction sites. | Three (3) times per development as a minimum | Starts immediately and reported December 2020 and then annually | Building Services Department, Engineering Department |
| Issuance of building permits. | Weekly | Starts immediately and reported December 2020 and then annually | Building Services Department |
| Inspection of building permit sites. | Weekly | Starts immediately and reported December 2020 and then annually | Building Services Department |
| Training for Developers and Builders | Annually | Starts immediately and reported December 2020 and then annually | Building Services Department, Engineering Department, Environmental Services Department |

The City has also adopted a Storm Water Management Guidance Manual that identifies suggested BMPs.

## Lists of Sites

The City of Laredo’s Building Services Department maintains a list of construction sites and their corresponding TPDES permit number. This list includes the name, location, and permit number. This list is maintained bi-monthly.

## Construction Site Inspections

As mentioned previously, the City assigns staff to review and inspect developments through the Building Services Department from clearing and grubbing of the site to the issuance of the CO.

# MCM 7 Public Education, Outreach, Involvement, and Participation

The Public Education, Outreach, Involvement, and Participation minimum control measure consists of BMPs that focus on the development of educational and media materials designed to inform public employees, businesses, and the general public of hazards associated with the illegal discharges and improper disposal of waste and about the impact that storm water discharges can have on local waterways, as well as steps the public can take to reduce pollutants in storm water systems. Specifically, these efforts are to teach the importance of protecting storm water quality for the benefit of the environment and human health. The role of each community member at home and at work are a particular emphasis.

The City currently has a variety of programs such as the Household Hazardous Waste (HHW) Collection program and the Love Laredo B.I.G. (Bag It Green) Campaign to help address these issues and educate the residents on how to reduce storm water pollutants. The City also collaborates with Keep Laredo Beautiful (KLB) in coordinating and hosting numerous tree planting events and creek clean-ups throughout the year. The City also provides supplies for the City Beautification Program and the Storm water Mural Installations with Keep Laredo Beautiful. Furthermore, educational information and materials about storm water are also provided through the City at numerous special events with other departments throughout the year. The City assists in planning and hosting numerous annual events such as Senator Judith Zaffirini's Environmental Summit, the Rio Grande International Study Center's Earth Day, and the Lamar Bruni Vergara Environmental Science Center's Earth Day events.

The City of Laredo Environmental Services Department will coordinate the record compilation of outreach activities by the staff including quantities of literature and promotional items distributed, records of media contacts, public speaking engagements, events, and meetings attended. Documentation shall be detailed enough to demonstrate the number of resources used to address each group. Evaluation of the success of this minimum control measure will be through careful analysis of the measurable goals for each BMP included in this minimum measure. The City of Laredo public education BMPs target all sectors of the public including residents, visitors, public service employees, businesses, commercial and industrial facilities. The City of Laredo will continue to refine the public education and outreach program and will summarize the annual activities in the Annual Report.

## Public Education and Outreach

**General Education on Storm Water**

The City will develop articles related to storm water such as the SWMP, storm water pollution prevention, reducing pet waste by the public through promoting use of pet waste bags, public events such as Earth Day and Household Hazardous Waste Event, better landscaping practices, and the effects of pet waste on storm water. The articles will be provided to residents through print publications, social media, and printed on handouts to be distributed at public events and displayed at other City of Laredo departments, or other available avenues.

**General Education on Storm Water**

Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Develop print media to handout for the Household Hazardous Waste Events twice per year | Twice per year | Twice prior to October 15, 2020, and then twice per year | Environmental Services Department |
| Print event information and distribute at City and County events | Once per year | Starts immediately and reported December 2020 and then annually | Environmental Services Department |
| Provide and distribute general storm water brochures at community events and at other City offices | Once per year | Starts immediately and reported December 2020 and then annually | Environmental Services Department |
| Provide storm water education and BMPs to children grades K – 12. Visit a minimum of ten (10) school each year. | Ten schools per year. | Starts immediately and reported December 2020 and then annually | Environmental Services Department |
| Distribute storm water promotional items at events that are relevant to environmental and storm water pollution. | Goal is to distribute 5,000 items per year. | Starts immediately and reported December 2020 and then annually | Environmental Services Department |

**Storm Water Social Media Content**

Social media has proven to be a useful method for reaching residents. Therefore, the City will post information about storm water-related issues and events on the City's social media content as appropriate and within the City's posting guidelines.

**Storm Water Social Media Content**

Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Continue to post new information and events as it becomes available. | Post new information and event information at least once per quarter | Starts immediately and reported December 2020 and then annually. | Environmental Services Department |
| Post general stormwater educational | Post at least two times per year. | Starts immediately and reported December 2020 and | Environmental Services Department |

| | | | |
|---|---|---|---|
| information on the City's social media outlets. | | then annually. | |

**PSA's and other MEDIA Advertisement**

Share Public Service Announcements "PSAs" and Video advertisements in a variety of city and public media outlets. The focus will be on storm water runoff and steps the public can take to reduce storm water pollution

**PSAs and Other MEDIA Advertisement**

Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Publish and promote PSAs and Video media content through City and various other businesses. Topics to promote include events and BMPS that can contribute to improved storm water quality. | Once per year. | October 15, 2020 and then annually | Environmental Services Department |

## Public Involvement and Participation

**Storm water Education at Special Events**

The City sponsors and co-sponsors special events such as the Kite Festival, Environmental Summit, and various events throughout the year where information regarding storm water will be distributed at a minimum of two events annually. The City assists Keep Laredo Beautiful in planning and hosting events and beautification projects where the City staff and KLB members set up booths or hand out information to attendees, as well as discuss storm water pollution issues during conversations at the events. Public events are great opportunities to reach residents, businesses, and visitors to the City

**Storm Water Education at Special Events**

Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Attend public events throughout the year and distribute storm water educational materials to event attendees. Report a summary of the items purchased for the events and total | At least two events per year. | October 15, 2020, and then annually | Environmental Services Department, Keep Laredo Beautiful |

| | | | |
|---|---|---|---|
| estimated attendance. | | | |

**Creekside Clean-Up Events**

City staff and KLB collaborate to host the Chacon Creek and other cleanup events designed to keep large items, floatables, and debris, from entering the waterways. Cleanup events are an excellent activity to create local ownership of environmental resources, educating the public and preventing pollutants from entering local waterways.

**Creekside Clean-up Events**

Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Continue to collaborate with Keep Laredo Beautiful ("KLB") for the Creekside Clean-up events. Track the location of each event, the number of participants, and the weight/volume of items removed. | Once per year. | October 15, 2020, and then annually | Environmental Services Department, Keep Laredo Beautiful, Parks and Recreation Department |

**Household Hazardous Waste "HHW" Program and Event**

The City owns and operates a Household Hazardous Waste Collection Center "HHWCC" located at 6912 TX-359, Laredo, TX 78043. It is open to the public on specific dates throughout the year. Residents may drop off electronic wastes and household hazardous waste such as aerosol cans, paint, fertilizers, oil, and cleaning products. In addition, the city hosts the bi-annual Household Hazardous Waste Events.

**Household Hazardous Waste ("HHW") Collection Program and Event**

Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Continue to offer the service for residents to drop off HHW at the City's HHWCC. Record the weight of materials collected, the amount recycled, and the amount sent off for disposal and participation of Laredo residents and other communities utilizing the facility. | Record identified information quarterly. | Report December 2020 and then annually. | Environmental Services Department |

| | | | |
|---|---|---|---|
| Continue to provide the City bi-annual HHW event for those who cannot make it to the HHWCC | Twice per year | Once by October 15, 2020, and then twice per year afterwards | Environmental Services Department |

**Neighborhood Beautification Program**
The City will provide most supplies and labor for various small neighborhood-wide cleanups and tree planting events. The City does take part in assisting to organize the cleanup. The program is very successful and the City has had thousands of volunteers in the community cleanup events.

**Neighborhood Beautification Program**
Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Continue to provide supplies, materials, and labor for neighborhood cleanup and tree planting events. Track the location of each event, the number of participants, and the weight/volume of items removed. | At least one event per year. | October 15, 2020, and then annually | Environmental Services Department |

**Love Laredo B.I.G. Pledge and Program**

The City and the non-profit group, Rio Grande International Study Center “RGISC”, collaborate on the ‘Love Laredo B.I.G. (Bag It Green) Campaign. This campaign promotes the use of reusable bags and educates the public about the environmental and storm water pollution hazards single-use plastic bags cause. The campaign asks community members and businesses to pledge to stop offering plastic bags and reduce single-use plastic.

**Love Laredo B.I.G. (Bag It Green) Pledge and Program**
Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| City will continue to develop print media on reusable bags and other “Bag It Green” items to promote the campaign and educate the public on best practices in removing single-use | Goal is to distribute reusable bags at every city and county event throughout the year. Attend a minimum of 10 city/county events throughout the year. | Starts immediately and reported December 2020 and then annually | Environmental Services Department, Keep Laredo Beautiful, |

| | | | |
|---|---|---|---|
| plastic. | Goal is to distribute 1000 other "Bag It Green' items each year as prizes. (i.e. Reusable Utensils and straws). | | |
| Share information on the City website and social media to promote taking the Pledge to Love Laredo B.I.G. | Once per year on City website and twice per year on social media | Reported December 2020 and then annually | Environmental Services Department, Keep Laredo Beautiful, |

## MCM 8 Monitoring, Evaluating, and Reporting

### Dry Weather Screening Program

The dry weather field screening program consists of developing a map of the Storm Sewer System for the City of Laredo, locating all storm water outfalls, including major outfalls, and choosing representative field screening points which will attempt to cover 100% screening. The task of sampling all the storm water outfalls will be divided into five (5) annual screening projects of 20% per year. A study on dry weather flow will be performed by collecting samples for laboratory analysis and drawing conclusions on the basis of field and laboratory results. Based on each year's laboratory test results, the environmental technicians will gradually add the task of resampling those outfalls suspected of having illicit discharges to the 20% storm water outfall screening project for that particular year. A residential major outfall consists of a 36-inch pipe or larger into which one or more drainage areas connect through an elaborate pipe system. These major outfalls discharge their total drainage storm water volume into a major creek or channel leading to the Rio Grande, or they discharge directly into the Rio Grande. Differentiating from the previously mentioned non-industrial major outfalls, only by the pipe diameter, a major outfall for an industrial zoned area is considered to be a 12-inch storm drain pipe or larger which directly drains into a major creek, major channel, or directly into the Rio Grande.

A team of technicians will be assigned the task of selecting the outfalls to be tested, taking grab samples from the outfalls, transporting the samples to our headquarters, and performing the corresponding storm water outfall screening tests. Selection of the outfalls to be sampled will be based on the existing numeric identification system of the outfalls. A CHEMetrics™ analysis kit equipped with specific ampoules will be utilized for the analysis of ammonia, total chlorine, total copper, detergents, and total phenols. Also, an Orion M1230 microprocessor based multiprobe meter will be utilized to measure pH, conductivity, temperature, dissolved oxygen (DO), and salinity. Finally, a Quanti-Tray / 2000 with Colisure Test will be utilized to estimate *E. coli* numbers. The designated technicians will follow all necessary QA/QC measures. The dry weather screening schedule is devised to increase productivity by having technicians attend outfall locations in close proximity to one another on a regular basis. The program will be conducted in specific months of every year. All samples will be collected after at least a 72-hour period of dryness between storm events.

**Program Schedule:**

Dry weather screening of all known storm water outfalls will be completed in a five-year period by sampling 20% of the total number of outfalls for each of the five (5) years that cover the permit's period. In addition to the annual 20% outfall screening, samples will be collected from those outfalls that are suspected of having illicit discharges for the remaining permit term.

**Dry Weather Screening Program**
Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Dry weather screening | 20% of the MS4 per year | 20% each year to be reported in December 2020 and then annually | Environmental Services Department |

## Wet Weather Screening Program

The Wet Weather Screening Program is implemented in addition to the representative wet weather monitoring program. It serves a similar purpose in that, for the life of the permit, its intention is to screen for pollutants within the City's four (4) major watersheds during storm events. Screening will be conducted twice a year for each of the watersheds.

Four (4) grab sample locations, one (1) per watershed, will be chosen based on accessibility and safety of the location; thus, alternate locations may be chosen which will remain representative of the discharging watershed. The four (4) watersheds to be tested are Chacon, Zacate, Upper Zacate, and Manadas Watersheds.

Environmental Services Department personnel conduct the field collection, perform the collected sample testing, record the findings obtained, and perform an analysis of the results for the two (2) yearly rain events. This analysis serves to better evaluate the need for continuing current water shed protection BMPs and also consider the need for additional projects.

The City staff will perform analysis of the collected samples by using a CHEMetrics™ analysis kit equipped with specific ampoules for the analysis of ammonia, copper, total chlorine, phenols and detergents. Additionally, an Orion M1230 microprocessor based multiprobe meter will be utilized to measure pH, conductivity, temperature, dissolved oxygen (DO), and salinity. Finally, a Quanti-Tray / 2000 with Colisure Test will be utilized to estimate *E. coli* numbers. The designated technicians will follow all QA/QC measures necessary.

**Wet Weather Screening Program**
Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Wet weather screening in four (4) watersheds | Bi-annually (twice per year) | Starts immediately and reported December 2020 and then annually | Environmental Services Department |

# Industrial and High Risk Runoff Monitoring Program

## Storm Event Discharge Monitoring

The representative wet weather monitoring program was developed by the City of Laredo to characterize the quality of storm water discharges from the MS4. Five (5) representative monitoring outfall locations have been established, based on land-use, and are described below:

Outfall 001 – Station located at 601 West Canal Street approximately 300 yards east of I-35 on West Canal between Pep Boys and Stein Mart
Outfall 002 – Station located at 102 West Guerrero Street on Zacate Creek
Outfall 003 – Station located at the intersection of Bustamante Street and Meadow Street
Outfall 004 – Station located at 602 Enterprise Street
Outfall 005 – Station located at 517 Jefferson Street at San Eduardo Street

These outfall are sampled at least once per season for representative storm events, which is greater than 0.1 inches in magnitude and occurs at least 72 hours from the previously measurable storm event. Analysis and collection of samples are in accordance with the methods specified in 40 C.F.R. Part 136. The parameters analyzed from each sample are as follows - in milligrams per liter (mg/L) except as indicated:

Biochemical Oxygen Demand, 5-day
Chemical Oxygen Demand (COD)
Oil and Grease
Total Suspended Solids (TSS)
Total Dissolved Solids (TDS)
Total Nitrogen
Total Kjeldahl Nitrogen (TKN) (i.e., ammonia nitrogen plus nitrate-nitrogen)
Total Antimony
Total Arsenic
Total Phosphorus
Dissolved Phosphorus
Total Cadmium (µg/L)
Total Chromium (µg/L)
Total Copper (µg/L)
Total Lead (µg/L)
Total Mercury (µg/L)
Total Nickel (µg/L)
Total Silver (µg/L)
Total Selenium (µg/L)
Total Thallium (µg/L)
Total Zinc (µg/L)
Chlordane (µg/L)
4, 4' - DDE (µg/L)
Total Polychlorinated biphenyls (PCBs) (µg/L)
Methylene Chloride (µg/L)
Toluene (µg/L)
E.coli (MPN/100 mL)

pH (report daily minimum and daily maximum results in standard units, "S.U.")
Hardness (as CaCO3)
Temperature (°C)
Atrazine (µg/L)

**Storm Event Discharge Monitoring**
Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Sampling of storm water | Once per season defined in permit | October 15, 2020, and then annually | Environmental Services Department |

## Floatables Monitoring

As mentioned previously the City of Laredo will weigh and document all floatables removed from the MS4 through creek cleaning activities, vacuum truck MS4 cleaning, and floatable controls that will be properly disposed of at the landfill.

**Floatables Monitoring**
Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Weighing and documenting floatables removed from MS4 | Weekly | Starts immediately and reported December 2020 and then annually | Environmental Services Department |

## Impaired Water Bodies and TMDL requirements

The City of Laredo does discharge directly into a water quality-impaired water that does not have an approved TMDL (Rio Grande), thus:

(1) By October 15, 2020, the City must determine whether the MS4 may be a source of the pollutant(s) of concern. The pollutant of concern is bacteria.

(2) The City has determined that the MS4 may discharge bacteria to an impaired water body without a TMDL. Therefore, the City has included in this SWMP focused BMPs, along with corresponding measurable goals that the permittee will implement to reduce the discharge of bacteria.

It must be noted in this section that the major contributor of bacteria to the Rio Grande is Laredo's Sister City in Mexico, Nuevo Laredo. Nuevo Laredo has reduced its bacterial pollutant load to the Rio Grande significantly through a waste water treatment plant funded through NAD Bank, however, Nuevo Laredo continues to contribute approximately 7 million gallons of raw sewage to the Rio Grande daily due to aging and substandard infrastructure. Moreover, there is no legal equivalent MS4 permit program that exists in Mexico.

The City will address this issue through these additional BMPs:

**Sanitary Sewer Systems**
The Utilities Department has implemented an Asset Management Program “AMP” to identify needed improvements to sanitary sewers to reduce overflows and utilizes “Mission Control” software to monitor and address lift station issues and inadequacies. Moreover, the Utilities Department has strengthened sanitary sewer use requirements to reduce blockage from fats, oils, and grease “FOG” with the implementation of an Industrial and High Strength Waste program that applies to all Food Services Establishments (FSEs), Food Processing Establishments (FPEs) and other commercial accounts. This program establishes a monitoring and surcharge program that assesses an additional surcharge that offsets added costs and operation loads the City encounters from treating Industrial and Commercial waste when the sewage concentrations are above the normal domestic Biochemical Oxygen Demand (BOD) and Total Suspended Solids (TSS) design concentrations of 250mg/L.

**Animal Sources**
Additionally, the City is expanding management programs to address pet waste by installing pet waste bag dispensers to all City parks.

**Residential Education**
Finally, to reduce bacteria runoff the City has implemented public education programs to address proper pet waste disposal and FOG education to reduce clogging of sanitary sewer lines to reduce overflows.

**Monitoring and Assessment**
The City will continue to monitor and assess and document these programs and report the results in our annual report.

**Impaired Water Bodies and TMDL requirements**
Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Utilization of AMP to identify needed improvements sanitary sewer lines. | Weekly | Starts immediately and reported December 2020 and then annually. | Utilities Department |
| Utilization of “Mission Control” software to monitor lift stations. | Weekly | Starts immediately and reported December 2020 and then annually | Utilities Department |
| Implementation and monitoring of Industrial and High Strength Waste program on FOG | Monthly | Starts immediately and reported December 2020 and then annually | Utilities Department |
| Installation of pet waste bag dispensers in all City parks. | Quarterly | Starts immediately and reported December 2020 and then annually | Parks Department |
| Residential FOG | Monthly | Starts immediately | Utilities Department |

| | | | |
|---|---|---|---|
| public education | | and reported December 2020 and then annually | |
| Monitoring of programs | Annually | Starts immediately and reported December 2020 and then annually | Environmental Services Department |

# ATTACHMENT 3.B.

**Application for Renewal**

**for the City of Laredo**

**and Laredo College**

**TPDES Phase I MS4 Permit**

**TPDES Permit No. WQ0004592000**

**City of Laredo, Webb County, Texas**

**RN103014353**

**April 17, 2024**

This page replaces Tab 3.B. from hard copy.

# Laredo Community College Storm Water Management Plan

## I. Adequate Legal Authority (122.26(d)(2)(1))

*(A) to control discharges*
*(B) to prohibit illicit discharges improper disposal*
*(C) to control spills*
*(D) to have interagency agreements*
*(E ) to require compliance*
*(F) to inspect*

For authorities required, the community college should include one of the following:

1. Demonstration of the authority (e.g.: copies of ordinances, penalties included);

2 Provide a schedule to pass the ordinance(s).

3. In SWMP, or in an agreement contract, the intent and mutual agreement by both parties that a co-permittee or another entity (with demonstrated authority) will provide the authority; or

4. Demonstrate that authority doesn't affect SWMP tasks proposed by the permittee.

LCC introduced a resolution at the October 15, 1998, Board of Trustees' Meeting to approve the proposed LCC Storm Water Management Program for the college and enter into an inter local agreement with the City of Laredo for this purpose. The Federal Register provides legal authority for the City of Laredo and Laredo Community College to:

a. control discharges
b. prohibit illicit discharges and improper disposal
c. control spills
d. have interagency agreements
e. require compliance
f. inspect

## II. Source Identification (122.26(d)(2)(ii))

Application must include a list of major out falls (or schedule for developing list) and an inventor' of industrial dischargers, (by watershed), if applicable.

This information has already been included in the inventory of outfalls submitted by the City of Laredo in their NPDES Part II application.

## III. Characterization Data (122.26(d)(2)(iii))

Permit term cooperative monitoring program must be submitted.

Schedule for preparation of annual loadings and EMCs for all major outfalls (or appropriate sub-watershed) must be provided. Permit will require submittal of this information no later than with the annual report for the fourth year of the permit.

This data will be submitted by the City of Laredo.

## IV. Proposed Storm Water Management Program (SWMP) (122.26(d)(2(iv))

The integration of SWMP activities by co-applicants must be discussed. For each SWMP element, the permitted must either propose a program element, indicate another co-permittee has agreed to implement their program on your portion of the system, or explain why a particular program element does not apply to your portion of the MS4.

### A. Residential and Commercial Runoff

*1. Structural Controls*

Existing structural controls must be evaluated for opportunities to retrofit for water quality improvement. The SWMP must include a program of maintenance for structure controls that control the discharge of pollutants in storm water runoff. The maintenance program must include a maintenance schedule for controls, or inspection schedules if a maintenance schedule is inappropriate. The maintenance program description must contain procedures for prioritization of maintenance and repair activities.

LCC owns, operates and maintains the drainage system that conveys runoff from the college grounds. The drainage system is typically composed of storm sewers, open ditches and out falls. Maintenance activities are an ongoing process and performed continuously throughout the year. These activities include:

| Facility | Activity | Frequency | Responsible Agency |
|---|---|---|---|
| Storm Sewers | Inspections | Semiannually | City of Laredo |
| | Clean/Flush | Annually | LCC |
| | Repair/Replace | As Needed | LCC |
| Ditches | Weed Control | Annually | LCC |
| | Cleaning | Annually | LCC |
| Out falls | Inspect/Clean | Semiannually | City of Laredo |
| | Clean/flush | Semiannually | LCC |
| | Repair/Replace | As Needed | LCC |

*2. Development/Redevelopment Master Planning Process*

The SWMP must include master planning process to reduce/limit pollutants, after construction, used during the project approval process for both new and significant redevelopment projects. The program should incorporate special requirements for development that may impact environmentally sensitive areas (e.g.: wetlands, aquifer recharge zones, etc. ). Guidelines and/or criteria manuals must be adopted (or existing ones referenced) for use in the design process. The master planning process must include the ability to review projects disturbing less than *five* acres.

Note that the goals of this program should include the reduction of pollutants to the maximum extent practicable and insuring that impacts of urban runoff do not result is degradation of receiving water quality (except as authorized under the State's Antideg-radation Policy). Both the impacts of storm water quality and quantity can be addressed under this master planning process.

Note also the comments on flood control projects below. Revisions to flood control planning should be incorporated into the master planning process.

LCC has established a plan to control pollution of storm water. This includes seeding and landscaping of areas that have been affected by new construction. These areas include islands in parking lots, areas around new buildings and other open areas which are subject to soil erosion. Seeding and landscaping occurs immediately after project close-out.

*3. Street Operation and Maintenance*

The SWMP must include a description of roadway operation and maintenance practices that will reduce the impact of runoff on receiving waters. The program should address litter control,

deicing activities, routine maintenance, materials storage, street sweeping, etc. Inspection and maintenance schedules/priorities must be provided.

Pollution prevention practices/BMPs for vehicle maintenance yards should be discussed.

LCC maintains a proactive approach to street operation and maintenance to reduce pollution of storm water LCC, on a daily basis during the week, addresses the area of litter control by picking up litter throughout the campus including sidewalks and roads. LCC has just completed Phase III of the Infrastructure Project which included repair and asphalt overlay of all roads and parking lots. LCC has also signed an agreement with the City of Laredo to sweep all LCC owned streets on a weekly basis during the weekend.

*4. Flood Control Projects*

Will the College be involved in flood control projects? How will the College's activities be integrated into flood control project planning that addresses reduction of water quality impacts?

If any flood control structures are located on College property, a schedule for evaluating feasibility for retrofitting storm water controls must be provided.

There are no flood control structures located on college property.

*5. Monitoring Runoff from Municipal Concerns*

Does the College have any subject activities within their jurisdiction?

At present, the runoff from municipal concerns is not substantial to require monitoring

*6. Reduction of pesticides, herbicides, and fertilizer*

What practices will the College use to reduce pollutants in runoff that are associated with application of pesticide, herbicide, and fertilizer? What education activities will be included and at what frequency?

LCC does not apply herbicides, insecticides or fertilizers. LCC retains outside contractors for pests such as ants, roaches and termites. These are applied by licensed pest control personnel. LCC is currently investigating the use of the latest technology in pest control to reduce pollutants in runoff water

## B. Illicit Discharges and Improper Disposal

### *1. Prevention - Inspections/Ordinances/Enforcement*

The College must have (or adopt) an effective prohibition on non-storm water discharges to the MS4. The SWMP must contain a list of any discharges that will be not be subject to the prohibition on non-storm water [see 40 CFR 122. 26(d)(2(iv)(B)(1)]. **The co-permittees may place appropriate controls (e.g. dechlorination of super-chlorinated water** line flushings, etc.) in order to insure a class of **discharges does not contribute significant** amounts of pollutants to the MS4. The co-permittees need to retain the ability to prohibit individual discharges on a case-by-case basis, should an individual discharger prove to be a significant source of pollutants.

What types of inspections will be used to complement the dry weather screening program? What will be the priorities and commitments?

As part of the inter local agreement, LCC will work with the City of Laredo to develop and implement a suitable program to comply with Federal Regulations. Illicit discharges are prohibited by the college and we will prevent these occurrences through education, publicity and monitoring of storm water to detect spills, should one occur.

### *2 Field Screening Program*

A continuing illicit discharge/improper disposal detection program must be described. What procedures/parameters will be used? What percentage of the system will be screened each year? What system will be used to determine "percent screened" (e.g number of basins, square miles, linear feet, etc.).

As part of the inter local agreement, LCC and the City of Laredo will develop a dry weather screening program and conduct field inspections required by such programs to screen the LCC drainage system at least once per year during the permit term.

### *3. Follow-up Investigations*

How will follow-up investigations be handled? There must be a commitment to doing the follow-up investigations according to some priority. There must be a commitment to expeditious removal of illicit discharges once *the source is identified.*
Once identified, all discharges will be investigated, documentation about the incident produced and appropriate action will be taken to prevent the reoccurrence of future illicit discharges.

### *4. Spill Response*

The SWMP must include a description of spill response procedures and coordination with co-permittees.

The campus police and college maintenance department will report all spills to the appropriate City of Laredo departments and will contract with a licensed HazMat spill handling company or the City's HazMat Response Team for expeditious spill removal.

*5. Public Involvement*

How will students/citizens be involved in detection and prevention of illicit discharges and improper disposal? Will the College be participating in the a co-applicant's "hotline" to report problems on the storm sewer system? Note that the number of complaints (over time) could be used as an indicator of effectiveness of the SWMP.

LCC will publish the storm water 'hotline' phone number in the campus newspaper to report problems with the MS4. Issues concerning storm water management requiring approval by the LCC Board of Trustees will be placed on the agenda for the first meeting after the issue is brought to light.

*6. Household Hazardous Waste/Used Oil Collection*

How will the College be participating in the required Household Hazardous Waste program? (e.g. funding, staffing, education material, etc.)

LCC currently collects and pays an outside contractor to discard used oil from the auto mechanic class shop and the college vehicle maintenance shop. The college will provide information through campus newspapers and memorandums to affected departments about collecting and disposing of hazardous waste through the city's Household Hazardous Waste (HHW) program. These wastes include chemicals used in science and art labs, cleaning chemicals used by the custodial staff, chemicals used in the print shop and any other hazardous wastes used in offices, classrooms and other areas. Also, LCC has a contract with the City of Laredo for HHW education.

*7. Sanitary Sewer Seepage*

A program to limit seepage from sanitary sewers, including inspection, maintenance, and response activities/procedures, must be described.

LCC will maintain a program of yearly inspections of manholes and sanitary sewer lines to find seepage of sewer material which could possibly contaminate storm water. Repairs will be carried out immediately in the event a defect is discovered in the sanitary system.

**C. Priority Industrial Runoff**

*1. Priorities and Procedures for Inspections and Controls*

Are there any landfills; hazardous waste treatment, disposal, and recovery facilities; facilities subject to reporting under EPCRA

title III, Section 313; or other significant industrial activities located on College property? Does this program element apply to the College?

This category is not applicable to the Laredo Community College.

*2. Monitoring of Industries*

Does this apply to the College?

This category is not applicable to the Laredo Community College.

**D. Construction Runoff**

The Storm Water Management Program must include the permittee's requirements for erosion and sediment control systems at construction sites. **Requirements should be** developed for all construction sites under the permittee's jurisdiction, including sites that disturb less than 5 acres of land. The following must be addressed:

*1. Site Planning Requirements*

LCC requires the submittal of a storm water pollution prevention plan for each construction site covered by the NPDES general permit for construction activities. The plan should describe and ensure the implementation of practices that will be used to reduce the pollutants in storm water discharges associated with the construction site and to assure compliance with the terms and conditions of the general permit. The Storm Water Pollution Prevention Plan must be completed prior to the start of the construction project and shall include the following elements:

a. Site description
b. Control measures during construction
c. Control measures after construction
d. Maintenance
e. Inspections

*2 Structural/Nonstructural Controls*

LCC requires the submittal of a storm water pollution prevention plan for each construction site covered by the NPDES general permit for construction activities. The plan will clearly describe for each major activity the appropriate control measures and the timing during the construction process that the measures will be implemented. The controls to minimize erosion and sedimentation will address the following:

a. stabilization practices
b. structural practices
c. other controls, e.g. waste disposal

*3. Inspections*

Within 24 hours after a significant rainfall event (0.5 inches), the contractor and engineer will inspect the entire project to determine the condition of the erosion control devices. Sediment will be removed from devices and damaged devices repaired as soon as practical. The contractor will remove silt accumulations and deposit the spoils in an area designated by the engineer. Qualified personnel shall inspect the construction site at least once every seven calendar days when the rainfall is less than 0.5 inches. During periods without measurable rain, the site shall be inspected at least once a month.

*4. Training/Education Program*

Existing requirements and technical specification documents may be referenced.

Since most construction will be College projects, the program should be **reviewed for** consistency with NPDES construction runoff permit requirements (e.g. inspections frequency, etc.) Note that all discharges of storm water associated with industrial activity, including construction site runoff, must have a separate NPDES "industrial" storm water permit.

LCC will work with the City of Laredo to provide training to LCC employees and contractors on how construction and maintenance activities can impact erosion control and pollutant removal efforts. This training will be conducted prior to major construction projects which may impact storm water management efforts.

**General Comments on the Storm Water Management Program**

1. How will "success" of the storm water management program be evaluated? Multiple measures of success can be used that would give an indication that SWMP implementation is reducing pollutants discharged to the receiving waters. Possible measures could include:

1 Program Evaluation - Multiple measures of success will be used that will give an indication that SWMP implementation is reducing pollutants discharged to the receiving waters. Runoff will be evaluated for pollutants before implementation to obtain a baseline to compare with future runoff evaluations.

2 *Education program:* Number of mailings, participants at seminars, surveys, number of complaints, etc. should be considered.

2 Education Program - The success of the education program will be measured by the total

number of people trained at SWMP seminars.

3. *Citizen complaints:* With regard to tracking citizen complaints, an initial increase in complaints could indicate more folks are becoming aware of storm water program (good) also followed by a drop-off in complaints (also good) could be one measure of success.

3 Citizen Complaints - These will be tracked to determine the success of the SWMP.

4. *Household hazardous wastes:* Amount recycled, reused, etc. Number of participants. Trend in amounts/types of materials collected.

4. Household Hazardous Wastes - The number of participants and the quantity of disposed hazardous wastes will be tracked.

5. *Monitoring:* Number of illicit discharges identified by dry weather screening program. Results of chemical monitoring and reduction in estimated loadings. Results of rapid bioassessments indicating improvement in biologic community. Amount of material collected in floatables monitoring program.

5 Monitoring - Runoff water will be monitored to determine discharge of illicit materials.

6. *Development/construction:* Projects approved with new construction erosion and sediment and long-term storm water quality controls, etc.

6 Development/Construction - All new construction projects will be approved only if the contractor can provide erosion, sediment, and long-term storm water quality controls.

## V. Assessment of Controls

An estimate of reduction in pollutant loadings due to implementation of the SWMP must be submitted.

An estimate in reduction of pollutant loadings due to the implementation of the SWMP will be submitted by the City of Laredo with the annual report.

## VI Fiscal Analysis

Information required by 40 CFR 122.26(d)(2)(vi) must be submitted.

LCC will submit a fiscal analysis of the capital, operation and maintenance expenditures necessary to

accomplish the activities of the SWMP. This analysis will include the source of funds that are proposed to meet the necessary expenditures.

**VII. Co-applicants**

Provide a copy of the signed interagency agreements that identifies the City of Laredo, Texas Department of Transportation and the Laredo community College as NPDES permit co-applicants. A summary discussion of the roles and responsibilities of co-applicants must be submitted, but can be an attachment to the SWMP, if desired. Reference should be made in the SWMP to the Interagency Agreement signed by all co-applicants.

This information was submitted to the EPA before December 1, 1998.

# ATTACHMENT 3.C.

**Application for Renewal**

**for the City of Laredo**

**and Laredo College**

**TPDES Phase I MS4 Permit**

**TPDES Permit No. WQ0004592000**

**City of Laredo, Webb County, Texas**

**RN103014353**

**April 17, 2024**

This page replaces Tab 3.C. from hard copy.

| **Bustamante Station** | | |
|---|---|---|
| 257.1 acres | **Avg Mean** | **Avg. Pounds** |
| Nitrogen, Organic as N mg/L | 2.35 | 128.54 |
| Solids, Total Dissolved (TDS)mg/L | 282.67 | 15449.95 |
| Solids, Total Suspended (TSS) mg/L | 231.40 | 12647.82 |
| Nitrogen, Total Kjeldahl as N mg/L | 2.20 | 120.43 |
| Biochemical Oxygen Demand mg/L | 33.45 | 1828.49 |
| Chemical Oxygen Demand mg/L | 74.27 | 4059.26 |
| Phosphorus, Diss. ( P ) mg/L | 0.21 | 11.59 |
| Antimony, Total ( Sb ) ug/L | 2.72 | 0.15 |
| Arsenic, Total ( As ) ug/L | 0.00 | 0.00 |
| Cadmium, Total ( Cd )ug/L | 0.71 | 0.04 |
| Chromium, Total ( Cr ) ug/L | 4.85 | 0.27 |
| Copper, Total ( Cu ) ug/L | 22.37 | 1.22 |
| Lead, Total ( Pb ) ug/L | 24.23 | 1.32 |
| Nickel, Total (Ni) ug/L | 4.70 | 0.26 |
| Phosphorus, Total ( P ) mg/L | 0.33 | 18.02 |
| Silver, Total ( Ag ) ug/L | 0.78 | 0.04 |
| Thallium, Total ( Tl ) ug/L | 0.60 | 0.03 |
| Zinc, Total ( Zn ) ug/L | 136.46 | 7.46 |
| Mercury, Total ( Hg ) ug/L | 0.11 | 0.01 |
| Selenium, Total ( Se ) ug/L | 0.90 | 0.05 |
| Atrazine ug/L | 2.77 | 0.15 |
| | | |
| | | |
| (HEM) Oil and Grease mg/L | 2.16 | 118.06 |
| Hardness, as CaCO3 mg/L | 263.83 | 14420.56 |
| Methylene Chloride ug/L | 3.33 | 0.18 |
| Toluene ug/L | 0.57 | 0.03 |

| **Canal Station**<br>859.1 acres | **Avg Mean** | **Avg. Pounds** |
|---|---|---|
| Nitrogen, Organic as N mg/L | 2.34 | 336.92 |
| Solids, Total Dissolved (TDS)mg/L | 488.83 | 70284.38 |
| Solids, Total Suspended (TSS) mg/L | 156.83 | 22549.47 |
| Nitrogen, Total Kjeldahl as N mg/L | 2.10 | 302.37 |
| Biochemical Oxygen Demand mg/L | 19.30 | 2774.47 |
| Chemical Oxygen Demand mg/L | 93.71 | 13473.85 |
| Phosphorus, Diss. ( P ) mg/L | 0.26 | 37.41 |
| Antimony, Total ( Sb ) ug/L | 4.66 | 0.67 |
| Arsenic, Total ( As ) ug/L | 0.00 | 0.00 |
| Cadmium, Total ( Cd )ug/L | 0.71 | 0.10 |
| Chromium, Total ( Cr ) ug/L | 4.00 | 0.57 |
| Copper, Total ( Cu ) ug/L | 16.61 | 2.39 |
| Lead, Total ( Pb ) ug/L | 6.41 | 0.92 |
| Nickel, Total (Ni) ug/L | 5.65 | 0.81 |
| Phosphorus, Total ( P ) mg/L | 0.35 | 50.66 |
| Silver, Total ( Ag ) ug/L | 0.78 | 0.11 |
| Thallium, Total ( Tl ) ug/L | 0.58 | 0.08 |
| Zinc, Total ( Zn ) ug/L | 87.32 | 12.56 |
| Mercury, Total ( Hg ) ug/L | 0.12 | 0.02 |
| Selenium, Total ( Se ) ug/L | 0.88 | 0.13 |
| Atrazine ug/L | 0.72 | 0.10 |
| | | |
| | | |
| (HEM) Oil and Grease mg/L | 1.90 | 273.18 |
| Hardness, as CaCO3 mg/L | 265.43 | 38163.72 |
| Methylene Chloride ug/L | 2.00 | 0.29 |
| Toluene ug/L | 0.39 | 0.06 |

| **Guerrero Station**<br>289 acres | **Avg Mean** | **Avg. Pounds** |
|---|---|---|
| Nitrogen, Organic as N mg/L | 3.43 | 201.87 |
| Solids, Total Dissolved (TDS)mg/L | 255.50 | 15029.82 |
| Solids, Total Suspended (TSS) mg/L | 188.00 | 11059.12 |
| Nitrogen, Total Kjeldahl as N mg/L | 3.86 | 227.16 |
| Biochemical Oxygen Demand mg/L | 33.68 | 1981.43 |
| Chemical Oxygen Demand mg/L | 105.85 | 6226.64 |
| Phosphorus, Diss. ( P ) mg/L | 0.22 | 13.22 |
| Antimony, Total ( Sb ) ug/L | 2.34 | 0.14 |
| Arsenic, Total ( As ) ug/L | 0.00 | 0.00 |
| Cadmium, Total ( Cd )ug/L | 0.71 | 0.04 |
| Chromium, Total ( Cr ) ug/L | 5.08 | 0.30 |
| Copper, Total ( Cu ) ug/L | 25.01 | 1.47 |
| Lead, Total ( Pb ) ug/L | 25.80 | 1.52 |
| Nickel, Total (Ni) ug/L | 6.13 | 0.36 |
| Phosphorus, Total ( P ) mg/L | 0.40 | 23.51 |
| Silver, Total ( Ag ) ug/L | 0.78 | 0.05 |
| Thallium, Total ( TI ) ug/L | 0.58 | 0.03 |
| Zinc, Total ( Zn ) ug/L | 190.54 | 11.21 |
| Mercury, Total ( Hg ) ug/L | 0.12 | 0.01 |
| Selenium, Total ( Se ) ug/L | 1.14 | 0.07 |
| Atrazine ug/L | 0.58 | 0.03 |
| | | |
| | | |
| (HEM) Oil and Grease mg/L | 2.02 | 118.63 |
| Hardness, as CaCO3 mg/L | 183.83 | 10814.02 |
| Methylene Chloride ug/L | 2.00 | 0.12 |
| Toluene ug/L | 0.37 | 0.02 |

| **Jefferson Station** | | |
|---|---|---|
| 411 acres | **Avg Mean** | **Avg. Pounds** |
| Nitrogen, Organic as N mg/L | 2.86 | 249.75 |
| Solids, Total Dissolved (TDS)mg/L | 241.17 | 21072.18 |
| Solids, Total Suspended (TSS) mg/L | 182.00 | 15902.43 |
| Nitrogen, Total Kjeldahl as N mg/L | 3.25 | 284.13 |
| Biochemical Oxygen Demand mg/L | 35.19 | 3074.47 |
| Chemical Oxygen Demand mg/L | 110.70 | 9672.52 |
| Phosphorus, Diss. ( P ) mg/L | 0.19 | 16.76 |
| Antimony, Total ( Sb ) ug/L | 2.30 | 0.20 |
| Arsenic, Total ( As ) ug/L | 0.21 | 0.02 |
| Cadmium, Total ( Cd )ug/L | 0.71 | 0.06 |
| Chromium, Total ( Cr ) ug/L | 11.31 | 0.99 |
| Copper, Total ( Cu ) ug/L | 19.47 | 1.70 |
| Lead, Total ( Pb ) ug/L | 23.40 | 2.04 |
| Nickel, Total (Ni) ug/L | 13.38 | 1.17 |
| Phosphorus, Total ( P ) mg/L | 0.43 | 37.15 |
| Silver, Total ( Ag ) ug/L | 0.78 | 0.07 |
| Thallium, Total ( TI ) ug/L | 0.58 | 0.05 |
| Zinc, Total ( Zn ) ug/L | 120.77 | 10.55 |
| Mercury, Total ( Hg ) ug/L | 0.12 | 0.01 |
| Selenium, Total ( Se ) ug/L | 0.90 | 0.08 |
| Atrazine ug/L | 0.58 | 0.05 |
| | | |
| | | |
| (HEM) Oil and Grease mg/L | 1.42 | 123.78 |
| Hardness, as CaCO3 mg/L | 151.08 | 13201.06 |
| Methylene Chloride ug/L | 2.33 | 0.20 |
| Toluene ug/L | 17.48 | 1.53 |

| **Enterprise Station**<br>43 acres | **Avg Mean** | **Avg. Pounds** |
|---|---|---|
| Nitrogen, Organic as N mg/L | 2.53 | 4.92 |
| Solids, Total Dissolved (TDS)mg/L | 171.67 | 333.89 |
| Solids, Total Suspended (TSS) mg/L | 293.00 | 569.89 |
| Nitrogen, Total Kjeldahl as N mg/L | 2.38 | 4.63 |
| Biochemical Oxygen Demand mg/L | 28.47 | 55.38 |
| Chemical Oxygen Demand mg/L | 142.80 | 277.75 |
| Phosphorus, Diss. ( P ) mg/L | 0.18 | 0.36 |
| Antimony, Total ( Sb ) ug/L | 2.60 | 0.01 |
| Arsenic, Total ( As ) ug/L | 0.00 | 0.00 |
| Cadmium, Total ( Cd )ug/L | 0.85 | 0.00 |
| Chromium, Total ( Cr ) ug/L | 6.12 | 0.01 |
| Copper, Total ( Cu ) ug/L | 16.59 | 0.03 |
| Lead, Total ( Pb ) ug/L | 9.21 | 0.02 |
| Nickel, Total (Ni) ug/L | 5.58 | 0.01 |
| Phosphorus, Total ( P ) mg/L | 0.25 | 0.48 |
| Silver, Total ( Ag ) ug/L | 0.94 | 0.00 |
| Thallium, Total ( Tl ) ug/L | 0.69 | 0.00 |
| Zinc, Total ( Zn ) ug/L | 236.20 | 0.46 |
| Mercury, Total ( Hg ) ug/L | 0.13 | 0.00 |
| Selenium, Total ( Se ) ug/L | 1.08 | 0.00 |
| Atrazine ug/L | 6.11 | 0.01 |
| | | |
| | | |
| (HEM) Oil and Grease mg/L | 7.17 | 13.94 |
| Hardness, as CaCO3 mg/L | 64,827.57 | 126090.02 |
| Methylene Chloride ug/L | 2.00 | 0.00 |
| Toluene ug/L | 0.43 | 0.00 |

| ALL STATIONS | Avg Mean | Avg. Pounds |
|---|---|---|
| Nitrogen, Organic as N mg/L | 2.70 | 187.36 |
| Solids, Total Dissolved (TDS)mg/L | 287.97 | 19960.92 |
| Solids, Total Suspended (TSS) mg/L | 210.25 | 14573.62 |
| Nitrogen, Total Kjeldahl as N mg/L | 2.76 | 191.28 |
| Biochemical Oxygen Demand mg/L | 30.02 | 2080.80 |
| Chemical Oxygen Demand mg/L | 105.47 | 7310.54 |
| Phosphorus, Diss. ( P ) mg/L | 0.21 | 14.89 |
| Antimony, Total ( Sb ) ug/L | 2.93 | 0.20 |
| Arsenic, Total ( As ) ug/L | 0.04 | 0.00 |
| Cadmium, Total ( Cd )ug/L | 0.74 | 0.05 |
| Chromium, Total ( Cr ) ug/L | 6.27 | 0.43 |
| Copper, Total ( Cu ) ug/L | 20.01 | 1.39 |
| Lead, Total ( Pb ) ug/L | 17.81 | 1.23 |
| Nickel, Total (Ni) ug/L | 7.09 | 0.49 |
| Phosphorus, Total ( P ) mg/L | 0.35 | 24.29 |
| Silver, Total ( Ag ) ug/L | 0.82 | 0.06 |
| Thallium, Total ( TI ) ug/L | 0.61 | 0.04 |
| Zinc, Total ( Zn ) ug/L | 154.26 | 10.69 |
| Mercury, Total ( Hg ) ug/L | 0.12 | 0.01 |
| Selenium, Total ( Se ) ug/L | 0.98 | 0.07 |
| Atrazine ug/L | 2.15 | 0.15 |
| | | |
| | | |
| (HEM) Oil and Grease mg/L | 3.31 | 229.50 |
| Hardness, as CaCO3 mg/L | 13108.42 | 908633.04 |
| Methylene Chloride ug/L | 32.08 | 2.22 |
| Toluene ug/L | 0.82 | 0.06 |

# ATTACHMENT 4

**Application for Renewal**

**for the City of Laredo**

**and Laredo College**

**TPDES Phase I MS4 Permit**

**TPDES Permit No. WQ0004592000**

**City of Laredo, Webb County, Texas**

**RN103014353**

**April 17, 2024**

This page replaces Tab 4 from hard copy.

# Attachment 4

## Brief Description of How All Program Elements Have Been Implemented to Meet the Requirements of the Existing Permit

*(1) MCM 1, MS4 Maintenance Activities.*

*a. Structural Controls. The existing permit requires that the permittee(s) operate the MS4 and any stormwater structural controls associated with the MS4 in a manner to reduce the discharge of pollutants to the Maximum Extent Practicable (MEP).*

The City of Laredo's "Specifications and Design Standards for Storm Drainage Improvements" ("Design Standards") is an official subdivision regulation adopted by the City Council in 1999 (amended in 2012 to comply with the "one acre or more" requirement). This document requires all planned subdivisions that are traversed by a water course, drainage easement, channel, or stream, to submit specifications and designs for storm drainage improvements to the City. The purposes of the City's Design Standards are: (1) to establish policies governing storm drainage facilities with the City Limits of Laredo and within its extraterritorial jurisdiction ("ETJ"); and (2) to protect the general health, safety, and welfare of the public by reducing flooding potentialities, controlling excessive runoff, minimizing erosion, providing for maintenance, addressing siltation problems, and eliminating damage to public facilities resulting from uncontrolled storm water runoff.

The City Engineer for the City of Laredo and his staff are involved with reviewing, approving, and inspecting new public improvement projects and subdivision developments to ensure that projects are constructed in accordance to plans and specifications and that construction is in accordance with adopted city standards. During Year 4 of the current permit, the City reviewed approximately thirty-five subdivision plans.

Laredo College ("LC") maintains the drainage system that conveys stormwater runoff from the LC campus. Maintenance activities such as storm sewer inspection, cleaning and repairs, open ditch cleaning, and vegetation control, are ongoing and performed continuously throughout the year.

*b. Floatables. The existing permit requires the permitee(s) to reduce the discharge of floatables, such as litter and other human generated solid refuse, into the MS4.*

The City has implemented the Commercial Litter Prevention Ordinance that addresses litter generated at commercial shopping centers. In addition, the City picks up trash twice per day in the downtown area. The City conducted 680 inspections during Year 4 of the current permit and issued four warnings, and the City collected 341 tons of debris from storm drains through its inlet cleaning and MS4 cleaning program.

Additionally, the City has installed structural controls at Bustamante and Guerrero. The structural controls at Bustamante have removed 15.01 cubic yards of floatables from the MS4, and the structural controls at Guerrero have removed 3.95 cubic yards of floatables from the MS4.

The City has also contracted with a third party to clean Zacate Creek, Chacon Creek, and Manadas Creek monthly, which has resulted in the collection of 21.5 tons of floatables during Year 4 of the current permit. In addition, Keep Laredo Beautiful ("KLB") held twenty-four cleanup events, in which volunteers helped cleanup public sites and collected approximately 12.84 tons of trash and litter.

Finally, in an effort to decrease the volume of pollutants flowing into the Rio Grande, the City has implemented an inlet/manhole/outfall/storm water sewer lines cleaning program. The program decreases pollutants that may reach and contaminate the City's watershed, makes current problem area locations easier to detect, helps control foul odors and make the area more aesthetically pleasing, minimizes the potential for street flooding caused by volume capacity reduction obstructions, and helps make sites safer for dry weather screening.

LC maintenance staff polices roads and grounds on a daily basis and picks up and disposes of all waste materials, including floatables, found in the storm drainage system. Each quarter, LC maintenance staff cleans and removes debris inside storm water manholes.

*c. Roadways. The existing permit requires the permitee(s) operate and maintain public streets, roads, and highways in a manner to minimize discharge of pollutants, including pollutants related to deicing or sanding activities.*

The City's program utilizes twelve street sweepers that maintain the City streets, concentrating on the major thoroughfares within the City. Major streets are cleaned at least once per week, with problem areas such as downtown cleaned on a daily basis. During Year 4 of the current permit, the City swept approximately 45,199 lane miles of streets. The City has also patched approximately 28,182 potholes and repaired 225 blocks of streets.

City employees involved in street asphalt breaking in order to repair underground infrastructure are trained to apply BMPs during such activities. These BMPs include covering and containing piles of dirt and/or trash in order to prevent or minimize the possibility of storm water runoff traveling down the street curves and running into storm inlets, creeks, channel, and/or any other MS4 structure. After finishing, covering the hole, and replacing the asphalt/concrete, the area will be cleaned and any leftover dirt and/or trash will be removed and disposed appropriately.

LC maintenance staff polices roads on a daily basis and picks up and disposes of all waste materials. Biannually, LC maintenance staff sweeps and clears all parking lots and streets.

*(2) MCM 2, Post-Construction Stormwater Control Measures.*

*a. The existing permit require the permittee(s) to continue implementation and enforcement of the controls to minimize the discharge of pollutants from areas of new development and significant redevelopment after construction is completed.*

The City adopted its Stormwater Management Ordinance (Ordinance No. 99-O-186) in June 1999, and it was amended in 2012 to address the "one acre or more" standard. The Storm Water Management Ordinance and the related guidance document address BMPs to be used in areas of new development and significant redevelopment. The ordinance requires the developer to sign a standard maintenance and monitoring agreement ("MMA") for any storm water facilities and BMPs constructed as part of the development process.

Upon final inspection of construction sites, developers of residential sites must provide a two-year warranty where the developer is responsible for maintenance of structural control BMPs. After those two years, the City is responsible for maintaining the BMPs through the Public Works Creek Cleaning Division. On commercial sites, as stated above, the City requires an MMA for the long-term maintenance of BMPs.

The City enforces its Stormwater Management Ordinance, Floodplain Ordinance, and Green Space Ordinance to control new development and significant redevelopment.

To deal with litter from commercial shopping centers, the City enforces the Commercial Litter Ordinance and conducted approximately 680 inspections during Year 4 of the current permit, issuing four warning and no citations.

LC provides temporary stabilization on all construction projects. Exposed soils or disturbed areas are provided a protective cover to reduce or eliminate erosion until final stabilization (*i.e.*, sodding/landscaping) is achieved or until further construction activities take place.

*b. The existing permit requires that the comprehensive master planning process (or equivalent) must be expanded to include all new development and redevelopment projects that disturb one acre or more of land, including projects less than one acre that are part of a larger common plan of development or sale that will result in the disturbance of one acre or more.*

In 2012, the City amended its Stormwater Management Ordinance to include all new development and redevelopment projects that disturb one acre or more of land, including projects of less than one acre that are part of a larger common plan of development or sale that result in the disturbance of one acre or more.

*c. The existing permit requires the permittee(s) to evaluate the existing SWMP(s) as necessary to ensure that this MCM includes a regulatory mechanism, such as an ordinance, to implement and enforce the new requirements of this program and*

*shall ensure that the SWMP includes strategies for structural and non-structural controls (i.e., BMPs) appropriate for the community. In addition, the permittee(s) shall provide for adequate long-term operation and maintenance of BMPs.*

Inspectors from the City's Environmental Services Department visit all public and private structural controls/BMPs at least once per year to assure compliance with maintenance schedules. Moreover, the City assesses receiving water bodies for the effectiveness of these controls and takes corrective actions through improvements (public facilities) or requires private facilities to take corrective actions through the enforcement of the MMA.

The City's Creek Maintenance Division in the Public Works Department is responsible for the cleaning and maintenance of all City creeks and drainage channels. In Year 4 of the current permit, approximately 150 acres of creeks were cleaned and maintained.

*d. The existing permit requires the permittee(s) to assess the impacts on the receiving water(s) for all flood control projects. Where feasible, new flood control structures must be designed, constructed, and maintained to provide erosion prevention and pollutant removal from stormwater. If applicable, the retrofitting of existing structural flood control devices to provide additional pollutant removal from storm water shall be implemented to the MEP.*

To minimize flooding, the City had three flood control projects under design at the time of the Year 4 Annual Report. These flood controls projects amount to approximately $2,800,000,000 worth of improvements. The three flood control projects are:

(1) Flores Avenue Phase II Drainage Project (Construction Phase);
(2) East Chacon Creek Drainage Project (Construction Phase); and
(3) Cherry Hill Drainage.

In addition, the City inspects all private and public Flood Control structures yearly. Environmental Services Department staff coordinates with the City's Public Works Department and commercial entities on required maintenance.

With regard to assessing impacts on receiving waters, the City's Environmental Services Department staff reviews water quality data to assess impacts from

development. The City reported in the Year 4 Annual Report that the data reviewed did not indicate obvious impacts to receiving waters for that year.

*(3) MCM 3, Illicit Discharge Detection and Elimination.*

*a. The existing permit requires the permittee(s) implement an ongoing program to detect and eliminate illicit discharges and improper disposal into the MS4.*

The City has implemented numerous ordinances to define and prohibit illicit discharges from entering the MWS4. The two main ordinances relied upon by the City are the Water Pollution Prevention Ordinance and the Illegal Dumping Ordinance. City enforcement staff investigate and cite offenders to eliminate illicit discharge violations. The City's Environmental Services Department staff are responsible for routine inspections of industrial storm water permits, mechanic shop inspections, and hazardous material permit inspections. These staff members also respond to and investigate 311 calls from the public regarding cases of illicit discharges and illegal dumping.

The City's dry weather screening and wet weather screening programs also help to identify potential cases of illicit discharge or illegal dumping.

LC contains potential illicit discharges of storm water associated with construction activities such as concrete and asphalt batch wastes, equipment staging areas, material storage yards, material borrow areas, excavated material disposal areas, *et cetera*, by implementing appropriate BMPs to reduce erosion and discharge of pollutants into storm water runoff from project sites.

*b. The existing permit requires the permittee(s) to identify all categories of miscellaneous, non-stormwater discharges that may be discharged into the MS4, and includes a description of any local controls or conditions placed on discharges exempted from the prohibition on non-stormwater.*

The City's Environmental Services Department has a list of "Allowable" discharges and requires businesses and individuals to submit a Non-Stormwater Discharge Form (via fax or internet form) to the Department prior to discharge activities. These "Allowable" discharges are:

(1) a discharge or flow from water line flushing/breakdown/ repair/overflow of potable water sources, but not including a discharge from water line disinfection by super chlorination or other means unless the discharge contains no harmful quantity of any chemical used in line disinfection;
(2) a discharge or flow from a diverted stream or natural spring;
(3) landscape irrigation, lawn watering, and irrigation;
(4) uncontaminated ground water infiltration, rising ground water, and uncontaminated pumped ground water;
(5) uncontaminated foundation drains and footing drains;
(6) residential and noncommercial/charitable car washing;
(7) discharge or flow from air conditioning condensation that is unmixed with water from a cooling tower, emissions scrubber, emissions filter, or any other source of pollutant;
(8) flows from riparian habitats and wetlands;
(9) a discharge or flow from emergency fire protection water that does not contain excessive oil or hazardous substances or materials. The emergency fire protection water from industrial or hazardous sites is required to be contained and treated prior to discharge, in which case adequate treatment to remove harmful quantities of pollutants must have occurred prior to discharge;
(10) agricultural storm water runoff;
(11) discharge or flow from a potable water source not containing any harmful substance or material from the cleaning or draining of a storage tank or other container;
(12) routine external building wash water, including graffiti removal (without detergent or other contaminants);
(13) pavement wash where spills or leaks of toxic or hazardous materials have not occurred (unless all spilled material has been removed and no detergents were used).

During Year 4 of the current permit, the City issued one non-stormwater permit.

*c. The existing permit requires the permittee(s) to address discharges or flows from firefighting only where such discharges or flows are identified as significant sources of pollutants.*

If discharges from firefighting activities are identified as significant sources of pollutants, the City will notify TCEQ within twenty-four hours.

*d. The existing permit requires the permittee(s) to prohibit any individual non-stormwater discharge otherwise exempted under this paragraph from the prohibition on non-stormwater that is determined by the permittee(s) to be contributing significant amounts of pollutants to the MS4.*

If an individual non-storm water discharge otherwise exempted by the City is found to be contributing significant amounts of pollutants to the MS4, the City will take enforcement action under the City's Water Pollution Prevention Ordinance.

*e. Elimination of Illicit Discharges and Improper Disposal. The existing permit requires the operator of an illicit discharge or improper disposal practice to eliminate the illicit discharge or stop the improper disposal practice as quickly as reasonably possible. If the elimination of an illicit discharge within 30 days is not possible, the permittee(s) shall require the operator of an illicit discharge to remove the discharge according to an expeditious schedule. Until the illicit discharge or improper disposal is eliminated the permittee(s) shall require the operator of the illicit discharge to take all reasonable measures to minimize the discharge of pollutants to the MS4.*

In order to detect and eliminate illicit discharges, during Year 4 of the current permit, the City conducted 62,267 feet of CCTV inspections on areas of the MS4 and conducted 2,094 pole camera inspections where deemed appropriate. No illicit connections were identified during Year 4.

The City has also completed a partial study of the downtown sanitary sewer system and is including projects in the Capitol Improvement Program (CIP) to resolve identified issues with the sanitary sewer system. Additionally, the City has cleaned 312,708 linear feet of sanitary sewer lines.

*f. Overflows and Infiltration. The existing permit requires the permittee(s) to implement controls where necessary and feasible to prevent dry weather and wet weather overflows from sanitary sewers in to the MS4. The permittee(s) shall continue to limit the infiltration of seepage from municipal sanitary sewers into the MS4.*

To address potential wastewater overflows, the City has undertaken an ambitious lift station overhaul program, acquired an additional vacuum truck for maintenance tasks, developed an inspection and enforcement program for restaurants, schools,

and other grease generators, and identified stricter standards for construction materials in the collection system. A sewage overflow is immediately vacuumed and removed or disinfected with granular chlorine on its route to the sewer.

In order to minimize the number of wastewater overflows, the City provides the following:

- Grease Control – continued inspections of food preparation establishments for proper grease trap capacity and maintenance.
- Line Obstructions – a vacuum truck is assigned exclusively to preventative maintenance of lines in the area where historic data shows recurring problems.
- A citywide educational campaign in order to inform the public in general about the proper disposal alternatives for waste cooking grease, used wipes, and other items generally thrown in the sinks and toilets. The Utilities Department gives out special grease disposal bags to the public.

During Year 4 of the current permit, the City addressed nine sanitary sewer spills or overflows. The City cleaned 312,708 linear feet of sanitary sewer lines and repaired fifty-five main sewer lines, thirteen force-mains, and 152 lateral lines.

*g. Household Hazardous Waste and Used Motor Vehicle Fluids. The existing permit prohibits the discharge or disposal of used motor vehicle fluids and household hazardous wastes, and the intentional disposal of collected quantities of grass clippings, leaf litter, and animal wastes in the MS4.*

The City has developed a community-based household hazardous waste ("HHW") collection and education program aimed at increasing community awareness and participating in proper disposal of HHW. The Environmental Services Department has implemented a HHW Collection Program, which includes a permanent residential hazardous waste drop-off facility as well as collection events that take place in the spring and fall. The City has also established a community-wide used oil recycling program in 1994. The used oil recycling program consists of neighborhood drop-off locations throughout the City.

During Year 4 of the current permit, the City collected a total of 44,694 pounds of HHW at the City's permanent facility and from one collection event. Also, during Year 4, the City collected and recycled approximately 74,110 gallons of used oil

and collected 91 fifty-five gallons drums of used oil filters for recycling. The City's Environmental Services Department inspected fifty-three vehicle maintenance shops for compliance and issued ten citations and twelve warnings.

*h.* *MS4 Screening and Illicit Discharge Inspections. The existing permit requires the permittee(s) to continue implementation of the Dry Weather Screening Program described in Part III, Section B.2.h.i. of the permit. Follow-up activities to eliminate illicit discharges and improper disposals may be prioritized on the basis of magnitude and the nature of the suspected discharge, sensitivity of the receiving water, or other relevant factors. The entire MS4, but not necessarily each individual outfall, shall continue to be screened at least once per five years.*

During Year 4 of the current permit, the Environmental Services Department conducted inspections on twenty percent of the outfalls in the City for a total of 191 dry weather inspections. Of the 191 inspections, twelve had effluent, but none of the had test values that indicated illicit discharges.

LC's maintenance department monitors the MS4 within the LC campuses. They periodically conduct inspections and report any illicit discharges to the City.

*i.* *Priority Areas. The existing permit requires the permittee(s) to develop a list of priority areas likely to have illicit discharges. The permittee(s) shall continue to evaluate and update this list each year and report the results in the annual report.*

The City has assessed priority areas, and based on industrial inspections, has identified Wilkison Iron and Metal and City Ready Mix as priority area. These two priority areas were reported in the Year 4 Annual Report.

*j.* *NPDES and TPDES Permittee List. The existing permit requires the permittee(s) to maintain an updated list of dischargers that discharge directly to the MS4 and that have been issued an NPDES or a TPDES permit. The list shall include the name, location, and permit number (if known) of the discharger.*

The City maintains and updates a list of dischargers that discharge directly to the MS4 and that have been issued a TPDES or NPDES Permit. The City includes the list in its Annual Report. The Year 4 Annual Report list of industrial facilities in

Laredo included thirty-four facilities. In addition, it identified two EPCRA Title 313 Industrial Facilities. The facilities were inspected and found to be in compliance with city ordinances.

*k. MS4 Map. The existing permit requires the permittee(s) to maintain a current, accurate MS4 map of the location of all MS4 outfalls; the names and locations of all waters of the U.S. that receive discharges from the outfalls; and any additional information needed by the permittee(s) to implement its(their) SWMP. Where possible, the permittee(s) shall use the Global Positioning System (GPS) to locate outfalls and photographs for documenting baseline conditions. The permittee(s) shall document the source information used to develop the MS4 map, including how the outfalls are verified and how the map will be regularly updated.*

The City's GIS Division and Environmental Services Department staff keep the MS4 map up-to-date. This includes ensuring that new storm drains, outfalls, and permitted facilities are located on the City's MS4 Map. Tools such as GPS are used to verify locations of new outfalls and facilities.

*l. Spill Prevention and Response. The existing permit requires the permittee(s) to implement existing programs which prevent, contain, and respond to spills that may discharge into the MS4.*

Through the City's Hazardous Materials Permit Program, the City's Environmental Services Department inspects facilities that may have a higher chance of chemical spills that could affect the MS4. During Year 4 of the current permit, the Environmental Services Department issued approximately 614 Hazardous Materials Handling Permits, conducted 2,387 inspections, issued 845 warnings, and issued zero citations. All facilities were brought into compliance.

Additionally, the City's Fire Department has a Hazmat Response Unit to respond to any spills of hazardous materials. There were eight responses to hazmat spills during Year 4 of the current permit. Staff from the City's Environmental Services Department followed up and found no discharges to any water bodies. For non-hazmat spills, the City utilizes the Public Works Department and then Texas Department of Transportation to respond.

*(4) MCM 4, Pollution Prevention and Good Housekeeping for Municipal Operations.*

*a. Pollution Prevention and Good Housekeeping program. The existing permit requires the permittee(s) to implement a pollution prevention and good housekeeping program for municipal operations.*

The City has identified various City activities that can potentially affect the MS4 and takes several actions to prevent pollution impacts to the MS4. The City conducts:

- Street Sweeping for City construction projects, in addition to an annual schedule for City-wide sweeping;
- Right of way mowing and mowed grass collection and removal;
- Storm system maintenance and cleaning, including detention facilities, on site detention ponds, -and outfalls.
- Maintenance of city-owned creeks and channels by City personnel and/or contractors.
- Maintenance-scheduled inspections by City personnel of commercially or privately owned creeks and channels to make sure private owners perform their contract agreed maintenance duties.
- Cleaning/mowing maintenance of City parks and regular emptying of trash disposal container dispensability at all City parks.
- Special Pet waste disposal containers maintenance and continual replacement of collection bags at City parks.
- Integrated Pest Management ("IPM") plan development at parks and other city owned open space areas.
- As part of the IPM plan, any private contracted commercial applicator shall have to follow all pesticide, herbicide, and fertilizer application rules on city property.
- Proper collection and disposal of accumulated storm water runoff waste.
- Landfill erosion and solid waste control maintenance.
- Municipal curbside solid waste activities.
- Wastewater and water treatment facility storm water protection operations.
- Operation and maintenance of lift stations.
- Implementation of training and BMPs to reduce pollutants from equipment yards (*e.g.*, sand filters at Public Works), road repair activities, and maintenance facilities.

The City's Environmental Services Department has a full-time crew and vacuum truck to handle the cleaning of inlets and the MS4. The crew has a cleaning schedule and performs multiple cleanings on heavy use areas, such as in the downtown area. During Year 4 of the current permit, the City cleaned approximately 3,860 inlets and 223, 260 linear feet of MS4 and collected 341 tons of debris that were disposed of in the City's landfill.

In addition, twelve street sweepers are used to maintain City streets, concentrating on major thoroughfares within the City. Major streets are cleaned at least once per week, with problem areas such as downtown cleaned on a daily basis. During Year 4 of the current permit, the City swept approximately 45,199 lane miles of streets. These sweepers utilize a sand trap (reviewed and approved by TCEQ) at the Public Works Department to discharge water from these operations.

City staff is trained on Good Housekeeping techniques for Public Works, Parks, and Fllet Management operations.

When required, LC includes a Storm Water Pollution Prevention Plan ("SWPPP") incorporating BMPs into all of its construction projects.

*b. Waste Handling. The existing permit requires the permittee(s) to ensure that waste removed from the MS4 or other municipal operations is properly disposed of.*

All waste from maintenance of municipal operations is disposed at the City's landfill. The landfill issues receipts for disposal of waste, and staff verifies receipts with contractors hired to maintain Zacate Creek, Chacon Creek, and Manadas Creek monthly. Over 21.5 tons of waste were collected during Year 4.

Additionally, the Environmental Services Department provides the staff necessary to manage the illegal dumping program, which assures proper waste disposal by individuals and businesses within the City.; The team consists of four code enforcement officers, who are certified by the Texas Department of Health. During Year 4 of the current permit, the City conducted 1,981 inspections and issued fifty-six citations and thirty-four warnings for environmental violations.

All waste materials from LC construction projects are taken to the City of Laredo MSW Landfill for proper disposal.

*c. Pesticide, Herbicide, and Fertilizer Application. The existing permit requires the permittee(s) to continue to implement controls to reduce the discharge of pollutants related to the storage and application of pesticides, herbicides, and fertilizers, by the (permittee's/permittees') employees or contractors, to public rights-of-way, parks, or other municipal property. The permittee(s), if it/they have jurisdiction over lands it/they do not directly own (e.g., incorporated city), shall implement programs to reduce the discharge of pollutants related to the commercial application and distribution of pesticides, herbicides, and fertilizers on those lands.*

The City has licensed commercial applicators and has partnered with the Agricultural Extension Service to conduct trainings. The City's Parks and Recreation Department has distributed educational information to its employees and is considering subcontracting pest control services to private companies. The City is also revising its Parks ordinance to include an Integrated Pest Management (IPM) plan. The City has completed a draft of the revised ordinance and will be working with the Parks Department on implementing this plan. It should be noted, that the City's Parks Department does not use pesticides or herbicides in city parks.

The City looks for alternatives to using pesticides and herbicides. For example, the City uses lady bugs (released at Keep Laredo Beautiful events) and other beneficial insects for pest control. The City also holds tire roundup events and minnow releases for mosquito control.

If the LC maintenance department or its contractors use pesticides, herbicides, or fertilizer, they follow the materials/manufacturer's recommended instructions.

*d. List of Municipal Facilities. The existing permit requires that the SWMP must include a list of all municipal operations subject to the municipal operation, maintenance, and training programs listed under this MCM and all municipally owned and operated industrial activities subject to TPDES or NPDES industrial stormwater regulations.*

The City maintains a list of all municipal operations subject to the municipal operation, maintenance, and training programs and all municipally owned and operated industrial activities subject to TPDES or NPDES industrial stormwater regulations. The City's list includes: Southside Wastewater Treatment Plant (WQ0010681003); North Laredo Wastewater Treatment Plant (WQ0010681004); Colombia Bridge Wastewater Treatment Facility (WQ0010681006); Jefferson

Water Treatment Plant (WQ0010681001); Penitas Wastewater Treatment Plant (WQ0010681007); Sombreretillo Wastewater Treatment Plant (WQ0010681008); Unitec Wastewater Treatment Plant (WQ0010681005); Zacate Creek Wastewater Treatment Plant (WQ0010681002); and Manadas Creek Wastewater Treatment Plant (WQ0015501001), all of which are permitted and in compliance. Additional permitted facilities are the Laredo MSW Landfill (TXR05DC19), the Ponderosa Regional Landfill (TXR05ET01), and the Laredo International Airport (TXR05V022), which also remain in compliance.

LC is made up of two campuses: the West Laredo Main campus (Ft. McIntosh) and the newer South Laredo campus.

*(5) MCM 5, Industrial and High Risk Runoff.*

*a. The existing permit requires the permittee(s) to continue to improve (its/their) existing programs to identify and control pollutants in stormwater discharges to the MS4 from: municipal landfills; other treatment, storage, or disposal facilities for municipal waste (e.g., transfer stations, incinerators, etc.); hazardous waste treatment, storage, disposal and recovery facilities; facilities that are subject to Emergency Planning and Community Right-to-Know Act (EPCRA) Title III, Section 313; and any other industrial or commercial discharge the permittee(s) determine(s) is/are contributing a substantial pollutant loading to the MS4.*

Staff with the Environmental Services Department conducts yearly inspections at the City's two MSW landfills. Also, landfill staff conducts a weekly checklist inspection for compliance with applicable storm water regulations and TCEQ's MSGP for industrial activities. The two MSW landfills were found to be in compliance during the Environmental Services Department's annual inspection.

There are no industrial or high risk runoffs at the LC campuses

*b. The program must include: priorities and procedures for inspections and for establishing and implementing control measures for such discharges; and an Industrial and High Risk Monitoring Program as described in Part III, Section B.2.h.iii. of the permit.*

During Year 4 of the current permit, staff with the Environmental Services Department (pursuant to the requirements of the City's Industrial Stormwater

Pollution Prevention Ordinance) inspected twenty-seven industrial facilities that have stormwater permits. They issued one warning and zero citations.

Additionally, as part of the City's Hazardous Materials Permit Program (pursuant to the requirements of the City's Hazardous Materials Storage Ordinance), staff with the Environmental Services Department inspects facilities that may have a higher chance of chemical spills that could affect the MS4. During Year 4 of the current permit, staff with the Environmental Services Department issued approximately 614 Hazardous Materials Handling Permits, conducted 2,387 inspections, and issued 845 warnings. No citations were issued. All facilities were brought into compliance.

*(6) MCM 6, Construction Site Stormwater Runoff.*

*a. The existing permit requires the permittee(s) to continue to implement a program to reduce the discharge of pollutants into the MS4 from construction sites. This MCM must include an ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under State or local law. The permittee(s) shall ensure that the existing program is revised as necessary to address construction projects that result in a land disturbance of one acre or more, including activities disturbing less that one acre that are part of a larger common plan of development or sale that would disturb one acre or more.*

The City amended its Stormwater Management Ordinance to construction projects that result in a land disturbance of one acre or more, including activities disturbing less than one acre that are part of a larger common plan of development or sale that would disturb one acre or more, on August 6, 2012.

The Stormwater Management Ordinance requires that a storm water management permit be obtained from the City for all land disturbances of one or more acres. The permit requires the development of a Storm Water Pollution Prevention Plan ("SWPPP") for proposed major construction, minor construction, street/road construction, and trenching and filling projects. Inspections of construction sites for compliance are also covered by the ordinance. Each storm water management permit issued by the City requires:

- completion of the City's standard Storm Water Pollution Prevention permit application form, which includes development of the SWPPP;
- a site, vicinity, contour, and drainage map;
- erosion control plans, methods and practices, as part of the SWPPP;
- the work schedule;
- the application process fee;
- a copy of the TPDES storm water discharge Notice of Intent ("NOI") and the approved permit from TCEQ; and
- an estimate of the monetary costs to develop and implement the permit requirements.

During construction, City inspectors visit the construction sites routinely, inspecting for compliance with the SWPPP and to inspect BMPs for effectiveness. Inspectors may issue citations for noncompliance to ensure the reduction of sediments from erosion entering the MS4.

*b. The program must include the following:*

- *requirements to use and maintain appropriate erosion and sediment control BMPs to reduce pollutants discharged to the MS4 from construction sites;*

  Reduction of pollutants such as sediment into the MS4 beings with the Subdivision Plat Approval process, where City staff reviews construction plans and reports for proposed public improvements of a submitted plat. The NOI submitted to TCEQ must also be submitted to the City. Proof of implementation of BMPs (e.g., silt fencing) must also be submitted to the City, resulting in the issuance of a Clearing and Grubbing Permit. As construction begins, City staff periodically visits the site to assure compliance with City engineering standards as well as to ensure that storm water BMPs are maintained and are functioning as designed. If deficiencies are observed, inspectors will require the developer to correct them. If deficiencies are not corrected, staff inspectors may issue Stop Work Orders or citations.

  Upon completion of the development, the City holds a pre-final construction meeting with the developer to inspect the site for compliance with the City's engineering standards and storm water BMPs.

To assure compliance and educate the development community, the City offers SWPPP and BMP educational trainings for construction site operators as well as engineers on an annual basis.

Where required, LC incorporates structural and non-structural BMPs such as silt fencing into its construction projects.

- *requirements for construction site operators to address the control of site waste, such as discarded building materials, concrete truck washout water, chemicals, litter, and sanitary waste;*

  As described above, the Stormwater Management Ordinance requires that a storm water management permit be obtained from the City for all land disturbances of one or more acres. The permit requires the development of a SWPPP that must address the control of site waste, such as discarded materials, concrete truck washout water, chemicals, litter, and sanitary waste.

- *requirements for inspections of construction sites and enforcement of control measure requirements;*

  All requirements for construction site operators are discussed in the City's Stormwater Management Ordinance and in the City's Illegal Dumping Ordinance. The City conducts inspections during all phases of the construction process, from the time a developer breaks ground until construction is completed.

  During Year 4 of the current permit, the City conducted 2,748 inspections of construction sites and issued twenty-one warnings and three citations.

- *requirements for the permittee(s) to provide appropriate education and training measures to construction site operators;*

  Site specific trainings were conducted during the approval process of construction sites, and were followed-up with site specific training in the field. During initial installation inspections, City staff train the site contractor regarding proper BMP installation techniques. At any after rain

event monitoring and modification sessions, the City ensures that the BMPs are functioning as desired. These sessions occur at all sites during the construction process. They City held twenty general stormwater trainings for the development community during Year 4 of the current permit.

- *notifications to construction site operators of their potential responsibilities under the NPDES or TPDES permitting regulations and permits for construction site runoff;*

  Site operators are notified of all stormwater-related requirements during initial plan and site review as well as through follow-up inspections and meetings.

  At LC, the construction site operator, general contractor, and any sub-contractors are notified of a site's storm water runoff requirements through the SWPPP for that project.

- *procedures for site plan review that incorporate consideration of potential water quality impacts;*

  Site plan review begins with the Subdivision Plat Approval Process with developer submissions to the City's OSS Committee for review and approval. The Planning and Zoning Commission also reviews and approves development plans. Pursuant to City ordinances, the potential for water quality impacts on the City's MS4 are considered throughout review and approvals, and BMPs required to address potential water quality impacts are inspected by City staff. Failure to comply with applicable water quality standards will result in citations and stop work orders.

- *procedures for receiving and considering input received from the public.*

  The public can provide input regarding proposed developments at meetings of the Planning and Zoning Commission. During the construction process, members of the public can contact the City via 311 or by contacting the Environmental Services Department directly to report potential violations affecting water quality.

- *a description of a program to implement and maintain structural and non-structural BMPs to reduce pollutants in stormwater runoff from construction sites to the MS4, which must include a description of the following;*

  All requirements for structural and non-structural BMPs are discussed in the City's Stormwater Management Ordinance and the Stormwater Guidance Manual.

- *procedures for site planning which incorporate consideration of potential water quality impacts;*

  As addressed above, the City's Stormwater Management Ordinance and the Stormwater Guidance Manual identify procedures for site planning which incorporate considerations of potential water quality impacts.

- *requirements for nonstructural and structural best management practices;*

  As addressed above, the City's Stormwater Management Ordinance and the Stormwater Guidance Manual identify requirements for nonstructural and structural BMPs.

- *procedures for identifying priorities for inspecting sites and enforcing control measures that consider the nature of the construction activity, topography, and the characteristics of soils and receiving water quality; and*

  Construction site inspections occur a minimum of three times during development. Inspection of building permit sites occur weekly.

- *appropriate educational and training measures for construction site operators.*

  Site specific trainings were conducted during the approval process of construction sites, and were followed-up with site specific training in the field. During initial installation inspections, City staff train the site contractor regarding proper BMP installation techniques. At any after rain

event monitoring and modification sessions, the City ensures that the BMPs are functioning as desired. These sessions occur at all sites during the construction process. They City held twenty general stormwater trainings for the development community during Year 4 of the current permit.

c. *Lists of Sites. The existing permit requires the permittee(s) to maintain a current list of construction sites that discharge directly to the MS4 and that have been issued an NPDES or TPDES permit. The list must include the name, location and permit number of the discharges that have been authorized under an NPDES or TPDES stormwater discharges permit for construction activities (if known).*

The City maintains a list of "Small Construction" site and a list of "Large Construction" sites. Both lists are included in the Year 4 Annual Report.

d. *The existing permit requires the permittee(s) to ensure and demonstrate that the program includes the following elements, in addition to those listed above:*

- *The permittee(s) shall require construction site contractors to implement appropriate erosion and sediment control BMPs and control waste (for example, discarded building materials, concrete truck washout water, chemicals, litter, and sanitary waste) at the construction site that may cause adverse impacts to water quality.*

  As addressed above, the City's Stormwater Management Ordinance and the Stormwater Guidance Manual identify requirements for nonstructural and structural BMPs, including erosion and sediment control BMPs.

- *The permittee(s) shall develop procedures for site plan reviews that incorporate consideration of potential water quality impacts, receipt and consideration of information submitted by the public, and site inspections and enforcement of control measures to the extent allowable under state and local law.*

  As addressed above, the City's Stormwater Management Ordinance and the Stormwater Guidance Manual identify procedures for site plan reviews that incorporate consideration of potential water quality impacts, receipt and

consideration of information submitted by the public, and site inspections and enforcement of control measures to the extent allowable under state and local law.

*(7) MCM 7, Public Education, Outreach, Involvement and Participation.*

*a. Public Education and Outreach*

- *The existing permit requires that the permittee(s) shall document and ensure that the SWMP promotes, publicizes, and facilitates public education and outreach to residents, visitors, public service employees, businesses, commercial and industrial facilities, and construction site personnel and provide justification for any group that is not addressed by the program The permittee(s) shall document the activities conducted and materials used to fulfill this program element and provide enough detail to demonstrate the amount of educational and outreach resources and materials used to address each group.*

  The City has an impressive multimedia education campaign that utilizes TV, radio, newspaper, and billboard ads to reach the public to promote household hazardous waste and used oil disposal, illicit discharge and illegal dumping reporting, and floatables reduction. The Education and Outreach program is designed to inform public employees, businesses, and the general public of hazardous associated with the illegal discharges and improper disposal of waste and about the impact that storm water discharges can have on local waterways, as well as steps the public can take to reduce pollutants in storm water systems.

  The City has a variety of programs, such as the HHW Collection program and the Love Laredo B.I.G. (Bag It Green) Campaign to help address these issues and educate the residents on how to reduce storm water pollutants. The City also collaborates with Keep Laredo Beautiful ("KLB") in coordinating and hosting numerous tree planting events and creek clean-ups throughout the year. The City provides supplies for the City Beautification Program and the Stormwater Mural Installations with Keep Laredo Beautiful. Furthermore, educational information and materials about storm water are provided through the City at numerous special events with other departments throughout the year. The City assists in planning and hosting numerous annual events such as Senator Judith Zaffirini's Environmental

Summit, the Rio Grande International Study Center's Earth Day, and the Lamar Bruni Vergara Environmental Science Center's Earth Day events.

The City's Environmental Services Department coordinates the record compilation of outreach activities by the staff including quantities of literature and promotional items distributed, records of media contacts, public speaking engagements, events, and meetings attended. The City's public education BMPs target all sectors of the public including residents, visitors, public service employees, businesses, commercial facilities, and industrial facilities.

During Year 4 of the current permit, the City's Environmental Services Department conducted school visits in both school districts, reaching approximately 1,705 students and citizens. Staff attended thirty-four seminars and training events, reaching 4,705 participants. These are high energy events that teach students and citizens about stormwater, water pollution, recycling, water conservation, litter prevention, and environmental stewardship.

LC posts information regarding the City's hazardous materials disposal program on bulletin boards on campus and utilizes its TV access to inform the public of trash recycling events. LC also notifies its personnel to notify the Physical Plant department of any storm water problems.

- *The existing permit requires the permittee(s) to continue to implement a public education and outreach program component to promote, publicize, and facilitate:*

  - *public reporting of illicit discharges or improper disposal of materials, including floatables, into the MS4;*

    See discussion, above.

  - *the proper management and disposal of used oil and household hazardous wastes; and*

    See discussion, above.

- *the proper use, application, and disposal of pesticides, herbicides, and fertilizers by public, commercial, and private applicators and distributors.*

  See discussion, above.

*b. Public Involvement and Participation. The existing permit requires the permittee(s) to develop and implement a public involvement and participation program which complies with State, Tribal, and local public notice requirements. This program element must include opportunities for a wide variety of constituents within the MS4 area to participate in the SWMP development and implementation.*

The City's public education BMPs target all sectors of the public including residents, visitors, public service employees, businesses, commercial facilities, and industrial facilities. In addition, as described above, the City works with a number of other groups ensure input in the development of educational programs and widescale participation in the implementation of the SWMP.

Keep Laredo Beautiful (KLB) held twenty-four cleanup events in which volunteers helped cleanup public sites and plant trees and flowers to beautify areas. The events promoted environmental stewardship and personal responsibility. These events collected approximately 12.84 tons of trash and litter. KLB advertises extensively using TV, radio, newspaper, and billboard ads.

*(8) MCM 8, Monitoring, Evaluating and Reporting. The existing permit requires the permittee(s) to continue to implement, and modify as necessary, the following monitoring or screening programs for dry weather, wet weather, and industrial and high-risk runoff:*

*a. Dry Weather Screening Program. This program shall continue the permittee(s)' efforts to detect the presence of illicit connections and improper discharges to the MS4. All areas of the MS4 must be screened at least once during the permit term. The permittee(s) may utilize modified screening methods based on experience gained during previous field screening activities; the screening methods are not required to conform to the protocol in 40 CFR § 122.26(d)(1)(iv)(D). Sample collection and analysis is not required to conform to the requirements of Part V, Section B.2. of the permit, "Test Procedures;" however, samples taken to confirm (e.g., in support of possible legal action) a particular illicit connection or improper*

*disposal practice must conform to the requirements of Part V, Section B.2. of the permit, "Test Procedures."*

The dry weather field screening program consists of developing a map of the City's MS4, locating all storm water outfalls, including major outfalls, and choosing representative field screening points which will attempt to cover 100% screening. The task of sampling all the storm water outfalls is divided into five annual screening projects of twenty percent per year. A study on dry weather flow is performed by collecting samples for laboratory analysis and drawing conclusions on the basis of field and laboratory results. Based on each year's laboratory test results, the environmental technicians gradually add the task of resampling those outfalls suspected of having illicit discharges to the twenty percent storm water outfall screening project for that particular year.

A team of technicians is assigned the task of selecting the outfalls to be tested, taking grab samples from the outfalls, transporting the samples to the City's headquarters, and performing the corresponding storm water outfall screening tests. The selection of outfalls to be sampled is based on the existing numeric identification system of the outfalls. A CHEMetrics™ analysis kit equipped with specific ampoules is utilized for the analysis of ammonia, total chlorine, total copper, detergents, and total phenols. Also, an Orion M1230 microprocessor based multiprobe meter is utilized to measure pH, conductivity, temperature, dissolved oxygen (DO), and salinity. Finally, a Quanti-Tray / 2000 with Colisure Test is utilized to estimate *E. coli* numbers. The designated technicians follow all necessary QA/QC measures. The dry weather screening schedule is devised to increase productivity by having technicians attend outfall locations in close proximity to one another on a regular basis. The program is conducted in specific months of every year. All samples are collected after at least a 72-hour period of dryness between storm events.

During Year 4 of the current permit, staff with the Environmental Services Department conducted inspections on twenty percent of the outfalls in the City for a total of 191 dry weather inspections. Of the 191 inspections, twelve identified effluent, none of which test values indicating illicit discharges.

*b. Wet Weather Screening Program: The existing permit requires the permittee(s) to identify, investigate, and address areas within their jurisdiction that may be contributing excessive levels of pollutants to the MS4.*

*The wet weather screening program shall:*

- *screen the MS4, as specified in the SWMP; and*
- *specify the sampling and non-sampling techniques to be used for current screening and also for follow-up screening.*

*Sample collection and analysis for the Wet Weather Screening Program is not required to conform to the requirements of Part V, Section B.2. of the permit, "Test Procedures;" however, samples taken to confirm (e.g., in support of possible legal action) a particular illicit connection or improper disposal practice must conform to the requirements of Part V.B.2. of the permit, "Test Procedures."*

The Wet Weather Screening Program is implemented in addition to the representative wet weather monitoring program. It serves a similar purpose in that, for the life of the permit, its intention is to screen for pollutants within the City's four (4) major watersheds during storm events. Screening is conducted twice per year for each of the watersheds.

Four grab sample locations, one (1) per watershed, are chosen based on accessibility and safety of the location; thus, alternate locations may be chosen which will remain representative of the discharging watershed. The four watersheds tested are Chacon, Zacate, Upper Zacate, and Manadas watersheds.

Environmental Services Department personnel conduct the field collection, perform the collected sample testing, record the findings obtained, and perform an analysis of the results for the two yearly rain events. This analysis serves to better evaluate the need for continuing current watershed protection BMPs and also consider the need for additional projects.

The City staff perform analysis of the collected samples by using a CHEMetrics™ analysis kit equipped with specific ampoules for the analysis of ammonia, copper, total chlorine, phenols and detergents. Additionally, an Orion M1230 microprocessor based multiprobe meter will be utilized to measure pH, conductivity, temperature, DO, and salinity. Finally, a Quanti-Tray / 2000 with Colisure Test will be utilized to estimate *E. coli* numbers. The designated technicians will follow all QA/QC measures necessary.

In Year 4 of the current permit, City staff conducted wet weather screening on a watershed basis. No high or above normal pollution loadings were detected.

*c. Industrial and High Risk Runoff Monitoring Program.*

- *The existing permit states that this program must include monitoring for pollutants in stormwater discharges to the MS4 from municipal landfills; other treatment, storage, or disposal facilities for municipal waste (e.g., transfer stations, incinerators, etc.); hazardous waste treatment, storage, disposal and recovery facilities; facilities that are subject to EPCRA Title III, Section 313; and any other industrial or commercial discharge the permittee(s) determine(s) is/are contributing a substantial pollutant loading to the MS4.*

  The City has implemented a compliance program for the monitoring and compliance of industries by passage of a city ordinance. The City initiated an education campaign targeting industrial facilities and staff in an attempt to educate and inform industries of the necessity to comply with the TPDES industrial storm water discharge permit (*i.e.*, MSGP), and advising them of the City Ordinances mandating compliance. Industrial facilities must prepare a comprehensive SWPPP, which will facilitate the performance of all tasks necessary to comply with current TCEQ guidelines for storm water discharges. Industrial facilities which store/handle hazardous materials will also be required to comply with the City's Hazmat Ordinance.

  Personnel from the Environmental Services Department conduct site inspections of the industrial facilities to identify if an NOI has been submitted or a permit has been issued, and to determine compliance with City ordinances. The Environmental Services Department addresses any concerns and discuss possible options the facility owner and staff might have. Industrial facilities are prioritized according to their potential for pollution production and discharge. The Environmental Services Department determines which facilities will be inspected more frequently according to their previous inspection records and the amount of pollution being discharged. Inspections are unannounced, and the Environmental Services Department inspectors follow a standardized inspection sheet, which covers all the necessary attributes for compliance. If a facility is found to be in non-compliance, the owner/operator will be notified, issued a Notice of Violation, and/or cited. The owner/operator will further be required to initiate a remediation program within thirty days and be in full compliance within sixty days from the date of notification and/or citation or face further legal enforcement including severe fines.

A database of active industrial facilities includes a risk level value for each of the facilities. The risk level will consist of a simple three number system (1-3), with the number one being low risk, the number two being medium risk, and the number three being high risk. All number three risk level facilities are inspected three times per year.

Facilities with inadequate inspection results are visited monthly until compliance is obtained and then two to four times yearly until analytical sampling and inspection results show continuous compliance for six months, after which inspection intervals will revert back to yearly at a minimum. Additionally, the City reviews monitoring data submitted for facilities under any TPDES storm water permit, EPCRA Title III, Section 313 industrial facilities, and hazardous waste treatment, disposal, and recovery facilities. Sites with any of these designations are inspected quarterly.

Any owner/operator found to be in compliance is required to submit a revised SWPPP, which address, at a minimum:

- Pollution prevention team
- Drainage area and calculations
- Spills and leaks
- Risk identification
- Measures and controls
- Preventive maintenance
- Internal inspections
- Non-storm water discharges
- Sediment and erosion control
- Description of pollutant sources
- Inventory of exposed materials
- Sampling data
- Summary of potential pollutant sources
- Good housekeeping requirements
- Spill prevention and response procedures
- Employee training
- Record keeping and internal reporting
- Management of runoff

- *The Industrial and High-Risk Runoff Monitoring Program must include the collection of quantitative data on parameters which have been identified by the permittee(s) as a pollutant of concern for that facility and shall:*

  - *coincide with the corresponding industrial sector-specific requirements of the TPDES Multi-Sector General Permit No. TXR050000 or any applicable general permit issued after September 29, 1995, and is not contingent on whether a particular facility is actually covered by the general permit;*

  - *coincide with the monitoring requirements of any individual permit for the stormwater discharges from that facility; and*

  - *include pollutants of concern for the stormwater discharge from that facility as identified by the permittee(s).*

  The City's Industrial and High-Risk Monitoring Program is operated in accordance with applicable City ordinances in conjunction with the City's program for inspection of industrial and high risk industries.

- *To avoid the duplication of efforts, the permittee(s) may review data collected by a facility as required by any individual or general permit for that facility rather than performing additional sample collection and analysis.*

  The City accepts monitoring data from industrial facilities in lieu of performing duplicative sampling and analysis.

- *In lieu of the monitoring discussed above, the permittee(s) may accept a certification from a facility that raw and waste materials, final and intermediate products, by-products, material handling equipment or activities, industrial machinery or operations, or significant materials from past industrial activity are not presently exposed to stormwater and are not expected to be exposed to stormwater for the certification period. Where a permittee accepts a "no exposure" certification, the permittee shall conduct site inspections of the facility not less than once per permit term to verify the "no exposure" exemption*

The City accepts "Not Exposure" certifications from industries.

- *The permittee(s) may also waive monitoring requirements under this permit for facilities that it/they determine(s) are in compliance with the TPDES Multi-Sector General Permit No. TXR050000.*

  Based on inspections and compliance with the City's Industrial Stormwater Pollution Prevention Ordinance, the City has waived monitoring requirements under the current MS4 permit for facilities determined to be in compliance with the TPDES Multi-Sector General Permit (MSGP).

d. *Wet Weather Characterization Sampling Program (if applicable): The permittee(s) participate(s) in a Wet Weather Characterization Program through a regional effort coordinated by the North Central Texas Council of Governments (NCTCOG). From 1997-2001 the permittee(s) conducted land use monitoring of stormwater outfalls within the MS4. For the current permit term, as well as the upcoming permit term, the permittee(s) is/are working in conjunction with other regional participants on an instream monitoring program to more accurately assess the effects of urban runoff on city streams and establish baseline data on the receiving streams to use in determining the long-term trends associated with stormwater runoff. The TCEQ, by letter of April 15, 2003, approved the original NCTCOG monitoring program.*

   N/A

   *In this application, the permittee(s) has/have requested approval to conduct sampling in accordance with a revised Regional Wet Weather Characterization Program (RWWCP). Specific changes to the original approved RWWCP were proposed by the NCTCOG by letter dated December 13, 2010. TCEQ approved this updated plan by letter dated February 11, 2011. The approved RWWCP includes certain revisions, and is described in Part VII.B.1.a of this fact sheet.*

   N/A

   *TCEQ supports the participation of the permittee(s) in the RWWCP. However, if the permittee(s) choose(s) instead to perform Wet Weather Characterization*

*Sampling according to the Representative Storm Event Monitoring option in lieu of the Regional Wet Weather Characterization Program (RWWCP) option then the permittee(s) must conduct outfall monitoring at the____ (insert number of outfalls) specified in the permit.*

N/A

*e. Storm Event Discharge Monitoring. The existing permit requires the permittee(s) to comply with the monitoring requirements in Part IV of the permit to characterize the discharge from the MS4.*

The representative wet weather monitoring program was developed by the City to characterize the quality of storm water discharges from the MS4. Five representative monitoring outfall locations have been established, based on land-use, and are described below:

- Outfall 001 – Station located at 601 West Canal Street approximately 300 yards east of I-35 on West Canal between Pep Boys and Stein Mart.
- Outfall 002 – Station located at 102 West Guerrero Street on Zacate Creek.
- Outfall 003 – Station located at the intersection of Bustamante Street and Meadow Street.
- Outfall 004 – Station located at 602 Enterprise Street.
- Outfall 005 – Station located at 517 Jefferson Street on San Eduardo Street.

These outfalls are sampled at least once per season for representative storm events, which is greater than 0.1 inches in magnitude and occurs at least 72 hours from that previously measurable storm event. Analysis and collection of samples are in accordance with the methods specified in 40 C.F.R. part 136. The parameters analyzed for each sample are identified in the current permit and the SWMP.

During Year 4 of the current permit, staff with the Environmental Services Department sampled all five of the following sample stations: Canal; Enterprise; Guerrero; Bustamante; and Jefferson. Grab samples and composite samples were sampled during the following seasons: October 2022 to January 2023; February 2023 to May 2023; and July 2023 to September 2023. DMRs for these sampling events have been submitted online via NetDMR to TCEQ.

Additionally, City staff has installed a network of ten rainfall stations throughout the City to allow staff and citizens to view rainfall data from specific locations in real time on the internet.

*f.* *Floatables Monitoring. The existing permit requires the permittee(s) to implement a floatables program as described in Part IV, Section B of the permit.*

The City has implemented the Commercial Litter Prevention Ordinance that addresses litter generated at commercial shopping centers. In addition, the City picks up trash twice per day in the downtown area. The City conducted 680 inspections during Year 4 of the current permit and issued four warnings, and the City collected 341 tons of debris from storm drains through its inlet cleaning and MS4 cleaning program.

Additionally, the City has installed structural controls at Bustamante and Guerrero. The structural controls at Bustamante have removed 15.01 cubic yards of floatables from the MS4, and the structural controls at Guerrero have removed 3.95 cubic yards of floatables from the MS4.

Finally, the City has contracted with a third party to clean Zacate Creek, Chacon Creek, and Manadas Creek monthly, which has resulted in the collection of 21.5 tons of floatables during Year 4 of the current permit. In addition, KLB held twenty-four cleanup events, in which volunteers helped cleanup public sites and collected approximately 12.84 tons of trash and litter.

# ATTACHMENT 5

**Application for Renewal**

**for the City of Laredo**

**and Laredo College**

**TPDES Phase I MS4 Permit**

**TPDES Permit No. WQ0004592000**

**City of Laredo, Webb County, Texas**

**RN103014353**

**April 17, 2024**

This page replaces Tab 5 from hard copy.

# Attachment 5

## Narrative Responses to Items on Application Form

*No. B.(c). Permittee (Applicant); Credential for Person Signing the Application*

Joseph Neeb is the City Manager of the City of Laredo. The City Manager is the principal executive officer of the City, as identified in the City Charter of the City of Laredo. *See* City Charter § 3.05 at Attachment 5.A. As the principal executive officer of the City, Mr. Neeb, as City Manager, complies with TCEQ's signatory requirements. *See* 30 TEX. ADMIN. CODE § 305.44(a)(3).

*No. C.(c). Co-applicant; Credential for Person Signing the Application*

Cesar Vela is the Vice President of Finance and Administration of Laredo College ("LC"). The Vice President of Finance and Administration is a principal executive officer of LC. As a principal executive officer of LC, Mr. Vela, as Vice President of Finance and Administration, complies with TCEQ's signatory requirements. *See* 30 TEX. ADMIN. CODE § 305.44(a)(3).

*No. E.(e). Briefly describe the primary business of the Regulated Entity.*

The Regulated Entity – the City of Laredo MS4 – is a series of conveyances, owned and operated by the City of Laredo and Laredo Community College, that is designed and used for collecting and conveying storm water.

*No. K. (d). Are there any modifications or changes from conditions of the current permit that are requested for consideration during the processing of this application for a TPDES MS4 permit? Including modifications or changes to the existing Storm Water Management Program (SWMP).*

No modifications or changes to the current TPDES permit are requested.

The City of Laredo requests the following modifications to its SWMP:

(1) The SWMP currently identifies that many Best Management Practices ("BMPs") are carried out, at least in part, by the Building Services Department. Specifically, BMPs identified in MCM 2, Post-Construction Stormwater Control Measures, MCM 3, Illicit Discharge Detection and Elimination, and MCM 6, Construction

Site Stormwater Runoff, identify the Building Services Department as one of the responsible departments. Due to a reassignment of services between City departments, the City requests to modify its SMWP to identify that the following BMPs will no longer be addressed by the Building Services Department, but instead will be carried out by the City's Engineering Department and/or Environmental Services Department:

- MCM 2 – Implementation and Enforcement of Controls to minimize discharge of pollutants from areas of new development and redevelopment.
- MCM 2 – Implementation of a comprehensive master planning process for new development and redevelopment projects that disturb one acre or more of land.
- MCM 2 – Evaluation of the existing SWMP as necessary to ensure that this MCM includes a regulatory mechanism, such as an ordinance to implement and enforce the new requirements of this program and shall ensure that the SWMP includes strategies for structural and nonstructural controls (*i.e.*, BMPs) appropriate for the community.
- MCM 2 – Assessment of the impacts on receiving water(s) for all flood control projects.
- MCM 3 – NPDES and TPDES Permittee List.
- MCM 3 – MS4 Mapping
- MCM 6 – Program to reduce discharges of pollutants into the MS4 from construction sites.
- MCM 6 – List of Sites.
- MCM 6 – Construction Site Inspections.

The City's budget now allocates funding associated with these activities to the Engineering Department and the Environmental Services Department.

(2) The City has updated the List of Municipal Facilities included in MCM 4 to add the Manadas Creek Waste Water Treatment Plant, the Ponderosa Regional Landfill, and the Laredo International Airport.

(3) The City has also added a description of the Ponderosa Regional Landfill in MCM 5.

(4) The City also requests to make minor revisions throughout the SWMP, as shown in the attached redline-formatted SWMP. See Attachment 9.A. These revisions are simply intended to clarify and/or update the SWMP to current practices.

LC does not request any revisions to its SWMP.

*No. L. Have all schedules of the current permit, relating to implementation and compliance with the Storm Water Management Program (SWMP), been met?*

The City inadvertently did not include the estimates of seasonal loadings and event mean concentrations in its Fourth Year Annual Report submitted to TCEQ, as identified in Part IV, Section A.4. of the permit. The City is submitting the estimates of seasonal loadings and event mean concentrations to TCEQ via separate letter. In addition, while the City met all of the established timeframes in the current permit and reported the steps taken toward compliance in the appropriate annual reports, it did not send separate notice of compliance to TCEQ. It is unclear to the City whether a separate notification of compliance is required to be sent to TCEQ because there is no specific Compliance Schedule in the permit. The City will be contacting TCEQ stormwater permitting staff to clarify the reporting requirements of the Permit, and if specific date-related obligation compliance reporting is required, the City will establish procedures to ensure that in the future all compliance-related reports are provided timely to the appropriate TCEQ offices. Lastly, the City did not include information in the Year 4 Annual Report that Laredo College had not provided information in support of the report more than forty-five days prior to submittal of the Annual Report. Laredo College did not submit its Year 4 Annual Report to TCEQ timely. The Laredo College Year 4 Annual Report is being submitted to TCEQ via separate letter.

*SPIF No. 4. Address of the project (description of the MS4 boundaries).*

This renewal application does not propose the construction of any "project" in the sense that an application for a wastewater discharge authorization might contemplate the construction of a wastewater treatment facility. Thus, there is no "address" for the MS4 "project" that is the subject of this application. The location of the MS4 is essentially all areas, except agricultural lands, within the corporate boundaries of the City of Laredo.

*SPIF No. 5. Provide the name, address, telephone and fax number of an individual that can be contacted to answer specific questions about the property.*

It is unclear what the term "property" means in this item, in that the application covers all areas, excluding any agricultural lands, located within the corporate boundaries of the City of Laredo. John Porter, Director of the City's Environmental Services Department, can answer specific questions about this renewal application and can be reached at:

John Porter, CFM, CPM, REM
Director
Environmental Services Department
City of Laredo

619 Reynolds Street
Laredo, Texas 78040
(956) 794-1650 (telephone)
(956) 727-7944 (facsimile)
jporter@ci.laredo.tx.us

*SPIF No. 8. Identify the name of the water body (receiving waters) or TCEQ segment number that will receive the discharge.*

The following bodies of water receive waters from the Laredo MS4: Rio Grande, Chacon Creek, Sombrerito Creek, Zacate Creek, Manadas Creek, Pinto Valle Creek, and San Idelfonso Creek. The discharge finally drains into the Rio Grande Below Amistad Reservoir, Segment No. 2304 of the Rio Grande River Basin.

*SPIF No. 9. Provide a 7.5-minute USGS quadrangle map with the project boundaries plotted and a general location map showing the project area. (This map is required in addition to the map requested in the application administrative report.)*

It is unclear what the term "project" means in this item, in that the application is for the renewal of the existing MS4 permit, which includes all areas, excluding agricultural lands, located within the corporate boundaries of the City of Laredo. A map depicting the location of the Laredo MS4 is included as Attachment 8 to this application.

*SPIF No. 10. Provide original photographs of any structures 50 years or older on the property.*

It is unclear what the term "property" means in this item because the application covers all areas, excluding agricultural lands, located within the corporate boundaries of the City of Laredo. The "property" associated with the Laredo MS4 is not a single tract of property, as would normally be the case with regard to a typical wastewater treatment and discharge application. Therefore, this item is not applicable to this renewal application. Due to the large geographic area covered by the City of Laredo's MS4 permit, it is not feasible to provide photographs of all structures fifty years or older within the City's corporate boundaries, i.e., within the "property" of the MS4.

*SPIF No. 11. Does your project involve any of the following?*

The use of the term "project" in this item is somewhat misleading. The renewal application does not propose the construction of any "project" in the sense that an application for a wastewater

discharge authorization might contemplate the construction of wastewater treatment facilities. The City has identified those activities most likely identified with the operation of the Laredo MS4.

*SPIF No. 12. List proposed construction impact (surface acres to be impacted, depth of excavation, sealing of caves or other karst features).*

Maintenance and development of the MS4 may result in the impacts indicated in response to SPIF No. 11 throughout the term of the permit.

*SPIF No. 13. Describe existing disturbances, vegetation & land use (plowing, other ground disturbances).*

Maintenance and development of the MS4 may result in ground disturbances throughout the term of the permit.

**List of Attachments**

Attachment 5.A. City of Laredo Charter § 3.05

# ATTACHMENT 5.A.

**Application for Renewal**

**for the City of Laredo**

**and Laredo College**

**TPDES Phase I MS4 Permit**

**TPDES Permit No. WQ0004592000**

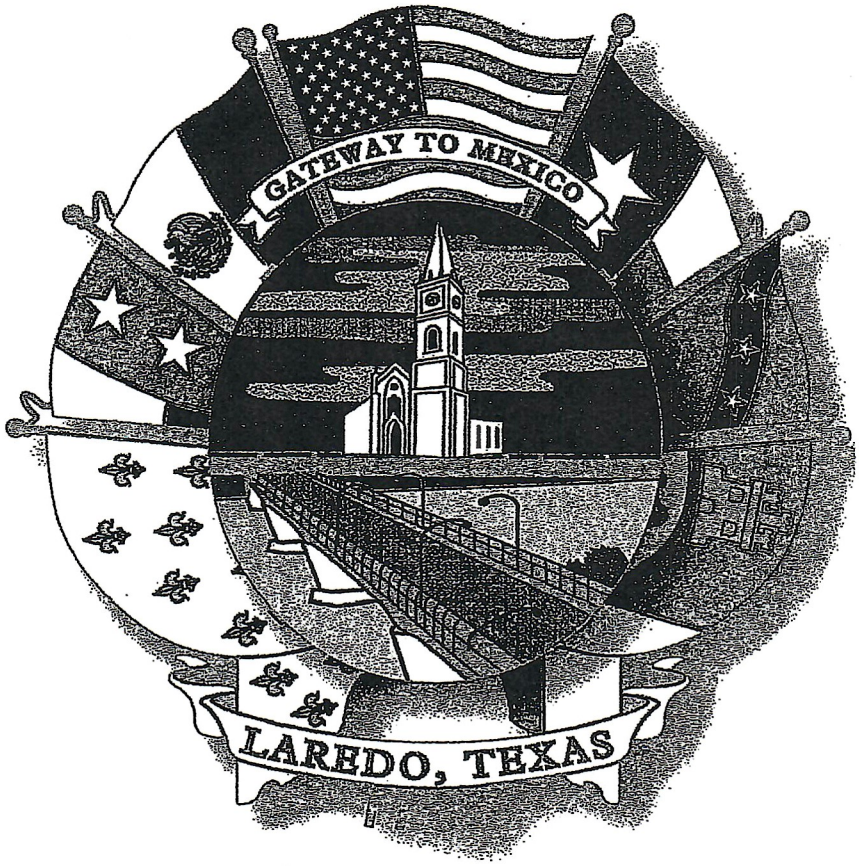
**City of Laredo, Webb County, Texas**

**RN103014353**

**April 17, 2024**

This page replaces Tab 5.A. from hard copy.

# City Charter




# of the City of Laredo

## ARTICLE III

## CITY MANAGER

### Section 3.01 Appointment; Compensation

The City Council, by a majority vote of total membership, shall appoint a City Manager for an indefinite term and fix the manager's compensation. His/her compensation shall be reviewed on a yearly basis upon the anniversary of his/or employment date.

### Section 3.02 Qualifications

The City Manager shall be appointed on the basis of executive and administrative qualifications. He/she shall have a Bachelor's Degree and no less than seven years experience in municipal government, five of which must be supervisory managerial experience. A Master's Degree in Public Administration is preferred. The City Manager need not be a resident of the City or State at the time of appointment, but must reside inside the City while in office.

### Section 3.04 Acting City Manager

By letter filed with the City Secretary, the City Manager shall designate, subject to approval of the City Council, a qualified City administrative officer to exercise the powers and perform the duties of City Manager during his/her temporary absence or disability. During such absence of disability, the Council may revoke such designation at any time and appoint another officer of the City to serve until the City Manager shall return or his/her disability shall cease. In the event the City Manager is incapacitated and cannot or will not designate an Acting City Manager, then the City Council shall appoint an Acting City Manager by a majority vote of total membership.

### Section 3.03 Removal

The City Manager shall not be appointed for a definite term, but may be removed at the will and pleasure of the City Council by a majority vote of total membership. The action of the City Council in removing the City Manager shall be final, it being the intention of the Charter to vest all authority and fix all responsibility for such removal on the City Council.

### Section 3.05 Powers and Duties of the City Manager.

The City Manager shall be the chief administrative and executive officer of the City. He/she shall be responsible to the City Council for the administration of all City affairs placed in his/her charge by or under this Charter. He/she shall have the following powers and duties:

(1) Shall appoint and, when he/she deems it in the best interest of the City, suspend or remove any City department directors provided for by or under this Charter, except as otherwise provided by law, this Charter or personnel rules adopted pursuant to this Charter. Department directors shall have the power to appoint, remove, or suspend all employees in their respective departments pursuant to policy as stated in Section 4.01(B), Directors of Departments;

(2) Shall direct and supervise the administration of all departments, offices, and agencies of the City, except as otherwise provided by this Charter or by law;

(3) Shall attend all City Council meetings and shall have the right to take part in discussion but may not vote;

(4) Shall see that all laws, provisions of this Charter and acts of this Council, subject to enforcement by the City Manager or by officers subject to City Manager's direction and supervision, are faithfully executed;

(5) Shall prepare and submit the annual budget and capital program to the City Council;

(6) Shall submit to the City Council and make available to the public a complete report on the finances and administrative activities of the City as of the end of each fiscal year;

(7) Shall make such other reports as the City Council may require concerning the operations of City departments, offices and agencies subject to his/her direction and supervision;

(8) Shall keep the City Council fully advised as to the financial condition and future needs of the City and make such recommendations to the City Council concerning the affairs of the City as he/she deems desirable, and

(9) Shall perform such other duties as are specified in this Charter or may be required by the City Council.

# ATTACHMENT 6

**Application for Renewal**

**for the City of Laredo**

**and Laredo College**

**TPDES Phase I MS4 Permit**

**TPDES Permit No. WQ0004592000**

**City of Laredo, Webb County, Texas**

**RN103014353**

**April 17, 2024**

This page replaces Tab 6 from hard copy.

# Attachment 6

## Letter from Texas General Land Office
## (Application No. J.(g))

TEXAS GENERAL LAND OFFICE
COMMISSIONER DAWN BUCKINGHAM, M.D.

March 8, 2024

Angela K. Moorman, Esq.
Birch, Becker & Moorman, LLP
1000 Heritage Center Circle, Suite 146
Round Rock, TX 78664

Re: GLO Response to Determination of Effect on Permanent School Fund Lands, Application to TCEQ for Renewal of TPDES Permit No. WQ0004592000, City of Laredo MS4 Permit

Dear Mrs. Moorman,

Upon careful examination, it has been ascertained that there are no Permanent School Fund Lands within the corporate boundaries of the City of Laredo. Consequently, the stormwater discharge from Laredo will not impact Permanent School Fund Lands. Should you require any further clarification, please do not hesitate to reach out to me directly at rob.watson@glo.texas.gov or (512) 463-5252.

Sincerely,

Rob Watson
Asset Management

# ATTACHMENT 7

**Application for Renewal**

**for the City of Laredo**

**and Laredo College**

**TPDES Phase I MS4 Permit**

**TPDES Permit No. WQ0004592000**

**City of Laredo, Webb County, Texas**

**RN103014353**

**April 17, 2024**

This page replaces Tab 7 from hard copy.

## Attachment 7

## List of Pollution Control Permits Held by Applicant and Co Applicant (Application No. K.(e))

*City of Laredo (CN600131908) Pollution Control Permits and Registrations*

| Permit/ Registration No. | Permittee Name | Permit/Registration Type |
|---|---|---|
| WQ0010681001 | City of Laredo | Wastewater. City of Laredo Jefferson Water Treatment Facility. |
| WQ0010681002 | City of Laredo | Wastewater. City of Laredo Zacate Creek WWTP. |
| WQ0010681003 | City of Laredo | Wastewater. South Laredo WWTP. |
| WQ0010681004 | City of Laredo | Wastewater. North Laredo WWTP. |
| WQ0010681005 | City of Laredo | Wastewater. Unitec WWTP. |
| WQ0010681006 | City of Laredo | Wastewater. City of Laredo Columbia Bridge WWTF. |
| WQ0010681007 | City of Laredo | Wastewater. Penitas WWTF. |
| WQ0010681008 | City of Laredo | Wastewater. Sombreretillo WWTP. |
| WQ0015501001 | City of Laredo | Wastewater. Manadas Creek WWTP. |
| R10681002 | City of Laredo | Wastewater Authorization. City of Laredo Zacate Creek WWTP. |
| R10681002A | City of Laredo | Wastewater Authorization. City of Laredo Zacate Creek WWTP. |
| R10681003 | City of Laredo | Wastewater Authorization. City of Laredo Southside WWTP. |
| R10681003A | City of Laredo | Wastewater Authorization. City of Laredo Southside WWTP. |
| R10681004 | City of Laredo | Wastewater Authorization. City of Laredo North Laredo WWTP. |

| Permit/ Registration No. | Permittee Name | Permit/Registration Type |
|---|---|---|
| R10681004A | City of Laredo | Wastewater Authorization. City of Laredo North Laredo WWTP. |
| R10681005 | City of Laredo | Wastewater Authorization. City of Laredo Unitec WWTP. |
| R10681007 | City of Laredo | Wastewater Authorization. City of Laredo Penitas WWTP. |
| R10681008 | City of Laredo | Wastewater Authorization. City of Laredo Manadas Creek WWTP |
| | | |
| TXR05AY15 | City of Laredo | Stormwater. City of Laredo North Laredo WWTP. |
| TXR05DC19 | City of Laredo | Stormwater. City of Laredo Landfill. |
| TXR05EE43 | City of Laredo | Stormwater. Laredo El Metro Operations. |
| TXR05ET01 | City of Laredo | Stormwater. Ponderosa Regional Landfill. |
| TXR05N289 | City of Laredo | Stormwater. City of Laredo Zacate Creek WWTP. |
| TXR05N904 | City of Laredo | Stormwater. Southside WWTP. |
| TXR05V022 | City of Laredo | Stormwater. City of Laredo. Laredo International Airport. |
| TXRNEAD77 | City of Laredo | Stormwater. City of Laredo Columbia Bridge WWTF. |
| TXRNEAQ84 | City of Laredo | Stormwater. City of Laredo – Penitas WWTP. |
| TXRNEAR11 | City of Laredo | Stormwater. City of Laredo Unitec WWTP. |
| | | |
| WQ0004592000 | City of Laredo | Stormwater MS4. Laredo MS4 Facility. |
| | | |
| 2371 | City of Laredo | Air Operating Permit. City of Laredo Landfill. |
| 3564 | City of Laredo | Air Operating Permit. Ponderosa Regional Landfill. |

| Permit/ Registration No. | Permittee Name | Permit/Registration Type |
|---|---|---|
| 80765 | City of Laredo | Air New Source Permit. Registration. City of Laredo Landfill. |
| 105661 | City of Laredo | Air New Source Permit. Registration. Ponderosa Regional Landfill. |
| 115214 | City of Laredo | Air New Source Permit. Registration. City of Laredo Landfill. |
| 4847900641 | City of Laredo | Air New Source Permit. AFS. City of Laredo Landfill. |
| 4847900678 | City of Laredo | Air New Source Permit. AFS. Ponderosa Regional Landfill. |
| WE0006E | City of Laredo | Air New Source Permit. Account. Laredo Landfill, Odors, Open Burning. |
| WE0264D | City of Laredo | Air Emissions Inventory. Account. City of Laredo Landfill. |
| WE0264D | City of Laredo | Air Operating Permit. Account. City of Laredo Landfill. |
| WEA0105 | City of Laredo | Air Operating Permit. Account. Ponderosa Regional Landfill. |
| WEA010J | City of Laredo | Air Emissions Inventory. Account. Ponderosa Regional Landfill. |
| | | |
| 95757 | City of Laredo | Industrial and Hazardous Waste. Solid Waste Registration. Ponderosa Regional Landfill. |
| EPA ID TXR000084596 | City of Laredo | Industrial and Hazardous Waste. Ponderosa Regional Landfill. |
| | | |
| 1693B | City of Laredo | MSW. City of Laredo Landfill. |
| 2286 | City of Laredo | MSW. Ponderosa Regional Landfill. |
| R16110962446 | City of Laredo | MSW Non-Permitted. Ponderosa Regional Landfill. |
| UNA455160071 | City of Laredo | MSW Non-Permitted. City of Laredo Landfill. |

| Permit/ Registration No. | Permittee Name | Permit/Registration Type |
|---|---|---|
| | | |
| 9940 | City of Laredo | PST. Registration. Laredo International Airport P O L, Aircraft Refueling. |
| 34146 | City of Laredo. | PST. Registration. Laredo International Airport. |
| 43617 | City of Laredo | PST. Registration. City of Laredo. Laredo El Metro Operations. |
| 52681 | City of Laredo | PST. Registration. |
| 69459 | City of Laredo | PST. Registration. City of Laredo Landfill, Fleet Refueling. |
| 75470 | City of Laredo | PST. Laredo Fire Training Facility. |
| | | |
| 95021 | City of Laredo | Leaking PST Remediation. City of Laredo. Laredo International Airport P O L. |
| 104866 | City of Laredo | Leaking PST Remediation. City of Laredo. Laredo International Airport P O L. |
| 106165 | City of Laredo | Leaking PST Remediation. City of Laredo. Laredo International Airport P O L. |
| | | |
| 2400001 | City of Laredo | Public Water System/Supply. Registration. City of Laredo. |
| 2400044 | City of Laredo | Public Water System/Supply. Registration. City of Laredo. Water Hauler. |
| | | |
| 21804 | City of Laredo | Sludge. Registration. City of Laredo Sludge Transporter. |
| | | |
| 10389 | City of Laredo | Tires. Registration. City of Laredo Public Works. |
| 11129 | City of Laredo | Tires. Registration. City of Laredo El Metro Operations. |
| 12444 | City of Laredo | Tires. Registration. El Metro Operations. |

| Permit/ Registration No. | Permittee Name | Permit/Registration Type |
|---|---|---|
| 6200048 | City of Laredo | Tires. Registration. City of Laredo. |
| | | |
| A85881 | City of Laredo | Used Oil. Registration. City of Laredo Solid Waste Department. |
| A86460 | City of Laredo | Used Oil. Registration. Rio Grande Autoplex. |
| C86798 | City of Laredo | Used Oil. Registration. City of Laredo HWY 359. |
| C86799 | City of Laredo | Used Oil. Registration. City of Laredo Fire Station 9. |
| C87604 | City of Laredo | Used Oil. Registration. City of Laredo Public Works Department. |

*City of Laredo – Other Environmental Authorizations*

| Permit/Registration Type | Permittee Name | Permit/ Registration Type |
|---|---|---|
| ID Nos. ADJ 67, ADJ 224, ADJ 538, ADJ 601, ADJ 952, ADJ 2698, ADJ 2761, ADJ 2774, ADJ 2777, ADJ 2783, ADJ 3997 | City of Laredo | Water Rights. |
| | | |
| TX07193 | City of Laredo | Dam Safety. City of Laredo San Isidro Detention Pond No. 3 Dam. |

*Laredo College (CN601429350) Pollution Control Permits and Registrations:*

| Permit/ Registration No. | Permittee Name | Permit/Registration Type |
|---|---|---|
| WQ0004592000 | Laredo College | Stormwater MS4. Laredo MS4 Facility. |

# ATTACHMENT 8

**Application for Renewal**

**for the City of Laredo**

**and Laredo College**

**TPDES Phase I MS4 Permit**

**TPDES Permit No. WQ0004592000**

**City of Laredo, Webb County, Texas**

**RN103014353**

**April 17, 2024**

This page replaces Tab 8 from hard copy.

# Attachment 8

## 7.5 Minute USGS Quadrangle Map
## (SPIF No. 9)

*Provide a 7.5 minute USGS quadrangle map with the project boundaries plotted and a general location map showing the project area.*

See attached map:

- USGS Quadrangle and General Location Map

San_Pedro_Hill
Cerritos_Blancos
Nido_Ranch
Callaghan_Ranch_South
Callaghan Ranch SE
Pato Creek
Fort_Mcintosh_3_NE
Dolores_Ranch
Cuervo_Creek
Orvil
Cibolo Ranch
Piedra Parada Tank
Laredo_West
Laredo_East
Tios Creek
Burrito Tank
Laredo_South
Blancas Creek North
Retama Creek
Isla_Mesteno
OKeefe_Lake
Blancas Creek South
Agua Azul Creek West

Inset:
General Location Map

Project Location

CITY OF LAREDO – ENVIRONMENTAL SERVICES DEPARTMENT
Map Compilation by: AGuajardo@laredo.tx.us


# City of Laredo, Texas TPDES Permit Renewal
# Resource Agency Review Map

## USGS Quadrangle and General Location Map

Middle Rio Grande Basin Segment 2304

0 0.5 1 2 3 4 5 6 7 8 Miles

1 = 106,000

N
W E
S

**Legend**

- Laredo City Limits
- One Mile Buffer of MS4 Service Area



Map Date: April 2024

# ATTACHMENT 9

**Application for Renewal**

**for the City of Laredo**

**and Laredo College**

**TPDES Phase I MS4 Permit**

**TPDES Permit No. WQ0004592000**

**City of Laredo, Webb County, Texas**

**RN103014353**

**April 17, 2024**

This page replaces Tab 9 from hard copy.

# Attachment 9

## Proposed Revisions to the City of Laredo's Storm Water Management Program

Included in this attachment are two documents:

| | |
|---|---|
| Attachment 9.A. | Proposed Revisions to the City of Laredo's Storm Water Management Plan ("SWMP") in **redline format** identifying proposed changes to the current SWMP. |
| Attachment 9.B. | A clean version of the proposed City of Laredo SWMP (*i.e.*, all redline revisions have been incorporated into the document for readability). |

# ATTACHMENT 9.A.

**Application for Renewal**

**for the City of Laredo**

**and Laredo College**

**TPDES Phase I MS4 Permit**

**TPDES Permit No. WQ0004592000**

**City of Laredo, Webb County, Texas**

**RN103014353**

**April 17, 2024**

This page replaces Tab 9.A. from hard copy.

# STORM WATER MANAGEMENT PLAN

## ~~2019 TO 2024~~

City of Laredo, Texas

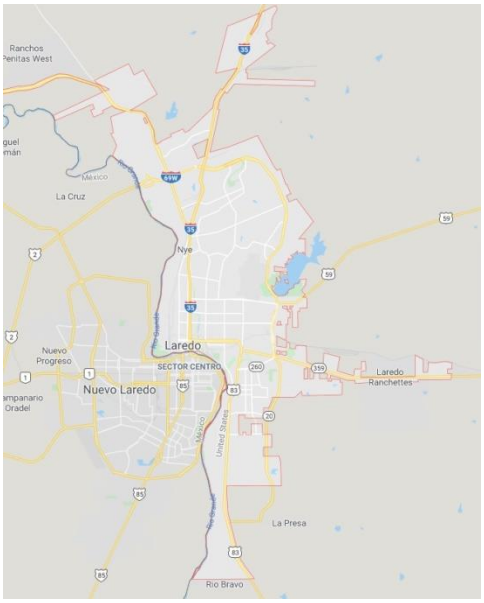
Phase I MS4 (WQ0004592000)

PROPOSED REVISIONS

April 17, 2024 RENEWAL APPLICATION

www.esd.cityoflaredo.com
City of Laredo
Environmental & Solid Waste Services Department
619 Reynolds Street, Laredo, Texas 78040

# CITY OF LAREDO
# WQ0004592000




## MUNICIPAL SEPARATE STORM SEWER SYSTEM (***MS4)***
## STORM WATER MANAGEMENT PROGRAM (***SWMP)***

In compliance with
The Texas Commission on Environmental Quality
Permit to Discharge
Under the Texas Pollutant Discharge Elimination System
Permit No. WQ0004592000, issued October 15, 2019
Permit term 5 years ~~***2019-2024***~~

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In 1972, Congress amended the Federal Water Pollution Control Act (commonly referred to as the Clean Water Act "CWA" to prohibit the discharge of any pollutant to waters of the United States from a point source unless the discharge is authorized by a~~n~~ National Pollutant Discharge Elimination System ("NPDES") permit. The NPDES program is designed to track point sources and requires the implementation of controls necessary to minimize the discharge of pollutants.

~~-~~In 1987, Congress amended the CWA to require implementation, in two phases, of a comprehensive national program for addressing storm water discharges. The first phase of the program, commonly referred to as "Phase I," was promulgated by the U.S. Environmental Protection Agency ("EPA") on November 16, 1990 (Federal Register, Volume 55, Page 47,990 [55 FR 47990]). Phase I requires NPDES permits for storm water discharges from a large number of priority sources, including municipal separate storm sewer systems ("MS4~~'~~s") generally serving populations of 100,000 or more and several categories of industrial activity, including construction sites that disturb five or more acres of land.

~~-~~EPA promulgated the second phase of the storm water regulatory program, commonly referred to as "Phase II," on December 8, 1999 (64 FR 68722). Phase II regulations address storm water discharges from certain MS4~~'~~s serving populations of less than 100,000 people and~~–,~~ included construction sites that disturb one or more acres of land.

As a Phase I city, the City of Laredo is required to implement and enforce a Storm Water Management Program ("SWMP") designed to reduce the discharge of pollutants from~~–~~ the MS4 to the maximum extent practicable, to protect water quality.

EPA has delegated authority to issue MS4 storm water discharge permits to the State of Texas. Under the authority of the Texas Water Code and the CWA, the Texas Commission on Environmental Quality ("TCEQ") is the regulatory body responsible for issuing permits regulating discharges from Phase I and II MS4s to surface waters in the state.

On October 15, 2019 the TCEQ issued the third storm water permit to the City of Laredo (WQ0004592000). This permit requires that the City of Laredo comply with a number of administrative and legal requirements and to update, implement, and enforce a SWMP designed to reduce the discharge of pollutants from the MS4 to the maximum extent practicable to protect water quality.

The MS4 permit is issued to both the City of Laredo and Laredo Community College, now Laredo College (“L~~C~~C”). The City of Laredo and L~~C~~C entered into an Interlocal Agreement ~~several~~ whereby the City of Laredo implements a SWMP for L~~C~~C.

**2019 to 2024 Best Management Practices**

Best Management Practices (BMPs) can include schedules of activities, prohibition of practices, maintenance procedures, structural controls, local ordinances, and other management practices to prevent or reduce the discharge of pollutants. BMPs also include treatment requirements, operating procedures and practices to control runoff, spills, or leaks, waste disposal, or drainage from raw material storage areas.

**Minimum Control Measures** Established in the MS4 Permit

**Best Management Practices** Selected by the MS4 Operator (City of Laredo)

**Responsible Authority (City Department)** Identified to do the following:

- ☐ Implement BMPs;
- ☐ Evaluate BMP effectiveness annually; and
- ☐ Document activity for annual reports.

**Measurable Goals** are milestones used by the MS4 operator (City of Laredo) and TCEQ to track progress and effectiveness of BMPs in reducing pollutants to the Maximum Extent Practicable (MEP). Measurable Goals include:

- A quantifiable target or other specified frequency to measure progress
- A schedule or date of completion

| Minimum Control Measures (MCMs) | |
|---|---|
| **MCM 1** | **MS4 Maintenance Activities** |
| **MCM 2** | **Post- Construction Stormwater Control Measures** |
| **MCM 3** | **Illicit Discharge Dectection and Elimination** |
| **MCM 4** | **Pollution Prevention and Good Housekeeping for Municipal Operations** |
| **MCM 5** | **Industrial and High Risk Runoff** |
| **MCM 6** | **Construction Site Stormwater Runoff** |
| **MCM 7** | **Public Education, Outreach, Involvement and Participation** |
| **MCM 8** | **Monitoring, Evaluating, and Reporting** |

| Minimum Control Measures & Best Management Practices | Responsible Department |
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| Structural Controls | Environmental & Solid Waste Services Department, Engineering Department |
| Floatables | Environmental & Solid Waste Services Department |
| Roadways | Public Works Department |
| **MCM 2 Post-Construction Stormwater Control Measures** | |
| Implementation and Enforcement of Controls to minimize discharge of pollutants from areas of new development and significant redevelopment | Environmental & Solid Waste Services Department, Engineering Department~~, and Building Services Department~~ |
| Implementation of a comprehensive master planning process for new development and redevelopment projects that disturb ~~more than~~ one acre or more of land | Environmental & Solid Waste Services Department, Engineering Department~~, and Building Services Department~~ |
| Evaluation of the existing SWMP as necessary to ensure that this MCM incudes a regulatory mechanism, such as an ordinance, to implement and enforce the new requirements of this program and shall ensure that the SWMP includes strategies for structural and nonstructural controls (i.e., BMPs) appropriate for the community. | Environmental & Solid Waste Services Department, Engineering Department~~, and Building Services Department~~ |
| Assessment of the impacts on receiving water(s) for all flood control projects. | Environmental & Solid Waste Services Department, Engineering Department~~, and Building Services Department~~ |
| **MCM 3 Illicit Discharge Detection and Elimination** | |
| Prohibition of illicit non-stormwater discharges from entering the MS4. | Environmental & Solid Waste Services Department |
| Miscellaneous, non-stormwater discharges that are authorized. | Environmental & Solid Waste Services Department |
| Elimination of Illicit Discharges and Improper Disposal. | Environmental & Solid Waste Services Department |
| Overflows and Infiltration. | Environmental & Solid Waste Services Department, Utilities Department |
| Household Hazardous Waste and Used Motor Vehicle Fluids. | Environmental & Solid Waste Services Department~~, Solid Waste Department~~ |
| MS4 Screening and Illicit Discharge Inspections | Environmental & Solid Waste Services Department |
| Priority Areas. | Environmental & Solid Waste Services Department |
| NPDES and TPDES Permittee List. | Environmental & Solid Waste Services Department, Engineering Department~~, Building Services Department~~, |
| MS4 Mapping | ~~Building Services~~Engineering Department |
| Spill Prevention and Response | Environmental & Solid Services Department, Public Works Department, Fire Department |
| **MCM 4 Pollution Prevention and Good Housekeeping Program** | |
| Pollution Prevention and Good Housekeeping | Various City Departments |
| Waste Handling | Various City Departments |
| Pesticide, Herbicide, and Fertilizer Application | Environmental & Solid Waste Services Department, Parks and Recreation Department |
| List of Municipal Facilities | Environmental & Solid Waste Services Department |
| **MCM 5 Industrial and High Risk Runoff** | |
| Programs to identify and control pollutants in stormwater discharges | Environmental & Solid Waste Services Department~~, Solid Waste Department~~ |
| **MCM 6 Construction Site Stormwater Runoff** | |
| Program to reduce discharges of pollutants into the MS4 from construction sites. | Environmental & Solid Waste Services Department, Engineering Department~~, and Building Services Department~~ |
| Lists of Sites | ~~Building Services~~ Engineering Department |
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| **MCM 7 Public Education, Outreach, Involvement, and Participation** | |
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| | Department |
|---|---|
| Storm Event Discharge Monitoring | Environmental & Solid Waste Services Department |
| Floatables Monitoring | Environmental & Solid Waste Services Department |
| Impaired Water Bodies and TMDL requirements | Environmental & Solid Waste Services Department |

## MCM 1 MS4 Maintenance Activities

### Structural Controls

Where a subdivision is traversed by a water course, drainage easement, channel, or stream, specifications and designs for storm drainage improvements shall be provided to the City, according to the document titled "Specifications and Design Standards for Storm Drainage Improvements," adopted by the City Council of the City of Laredo as an official subdivision regulation.

The purposes of the storm drainage standards are: 1) to establish policies governing storm drainage facilities within the City Limits of the City of Laredo and its extraterritorial jurisdiction; and 2) to protect the general health, safety, and welfare of the public by reducing flooding potentialities, controlling excessive runoff, minimizing erosion, providing for maintenance, addressing siltation problems, and eliminating damage to public facilities resulting from uncontrolled storm water runoff.

As a general requirement for any property involved in the platting process, the owner/developer is to provide, at his expense, a preliminary drainage study of the area proposed for development. The City Engineer or his authorized designee may specifically exempt in writing plats that have previously approved drainage studies, or amended plats. The study shall include the following:

- Existing topography shown by contour lines.
- Existing and proposed drainage facilities both on-site and on adjacent affected properties.
- The scale shall not be smaller than one inch (1") = two hundred feet (200').
- Sufficient design calculations showing preliminary sizes of drainage facilities and easement sizes and locations.

Requirements for completed final plans are as follows:

- The developer and his engineer shall be responsible for the accuracy of the information furnished in the design of the storm drainage facilities, pertaining to both the development site in question (on-site) and affected (off-site) properties.
- All drainage easements, both within the subdivision and off-site, shall be dedicated to the City of Laredo if constructed in conformance with city standards. If not designed to city standards, the developer has the option to construct and maintain.
- A general location map of the subdivision showing the entire watershed shall be provided.
- Calculations showing the anticipated storm water flow computed on the basis of ultimate development of the entire watershed area, percent runoff, and time of the concentrations shall be provided.
- Calculations shall be submitted based on 10-year and 25-year frequency design.

- When a drainage channel or storm sewer is proposed, calculations on design and complete plans and specifications shall be submitted showing complete construction details.
- When conditions downstream from a proposed channel or storm sewer cannot handle maximum design flow, high water surface elevations based on a 25-year frequency shall be indicated based on existing conditions.
- Compliance with Federal Emergency Management Agency ("FEMA") regulations is mandatory.
- Compliance with the Green Space Ordinance.

Drainage facilities covered by the ordinance are streets, conventional systems (*e.g.*, enclosed underground structures), reinforced concrete-lined open channels, combination earthen/concrete channels, and natural creeks/streams.

The storm drainage improvements and maintenance requirements for subdivisions were passed and approved by the City Council on June 28, 1999, and the ordinance was amended in 2012 to comply with the "one (1) acre or more" requirement.

The City Engineer and his staff are involved with reviewing, approving, and inspecting new public improvement projects and subdivision developments to ensure that the projects are constructed according to plans and specifications and that construction is in accordance with adopted city standards.

The subdivision ordinance document, "Specifications and Design Standards for Storm Drainage Improvements and Maintenance," has reduced the risk of flooding during large magnitude storm events in new subdivisions around the City.

**Structural Controls**

Measurable Goals ~~2019-2024~~

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Review of Drainage Plans for Subdivisions | Bi-monthly (twice per month) review | Reviews start immediately and are reported December 2020 and then annually | Environmental & Solid Waste Services Department, Engineering Department |

## Floatables

In an effort to decrease the amount of pollutants flowing into the Rio Grande, the City has implemented an inlet/manhole/outfall/storm water sewer lines cleaning program. The storm water main and lateral line conditions are first inspected by utilizing a CCTV Audio/Video recording Pole Camera, and for larger area distances, a specialized van loaded with a CCTV Electro/Mechanically controlled robot and a computerized recording system. The program will decrease pollutants that may reach and contaminate the City's~~our~~ watershed, will make current problem area locations easier to detect, will help control foul odors and make the area more aesthetically pleasing, will help minimize the potential for street flooding caused by volume capacity reduction obstructions, and will help -make sites safer for dry-weather screening.

The program will be designed in a systematic fashion so that all locations will receive attention in an expedient manner. The crew will thoroughly clean the main and lateral storm sewer lines, inlets, manholes, and outfalls in the specified areas on a daily basis. All the information pertaining to the inlets, manholes, and outfalls will be recorded and reported as the actual number of them that are actually maintained. On the other hand, the amount of main and lateral storm water sewer lines CCTV inspected, flushed, and vacuumed, will be recorded and reported in linear feet.

The Environmental & Solid Waste Services Department will be responsible for the cleaning of all inlets, manholes, and outfalls and sewer lines on a scheduled basis. Thus a major duty of this crew is to clean the inlets, manholes, and outfalls. The goal of this program is to clean all the inlets, manholes, and outfalls at least once a year. It is anticipated that an average of 20 to 30 manholes, inlets, and outfalls can be cleaned on a single working day.

The proposed goal for the minimum amount of storm sewer lines cleaned will be 20,000 linear feet per month. The proposed goal for the minimum amount of storm sewer lines CCTV inspected will be 2,000 linear feet per month. The mud and trash collected from the sewer system will be properly collected, transported, and disposed at the local city landfill. This mud/trash collected will be weighted, recorded and reported in pounds and/or tonnage collected.

The criteria used to establish priorities for inspection and cleaning include: amount of trash accumulation in specific land use areas, which have heavy traffic and are highly visible commercial/business/industrial areas; new development storm water infrastructure warranty expiration deadline in which ownership and maintenance responsibility is transferred to the city after a two year period from the end of development completion; and an existing older subdivision inspection/cleaning rotation program.

Additionally, along with the City picking up trash twice per day in the downtown area, the City has implemented a Commercial Litter Prevention Ordinance that deals with litter generated at commercial shopping centers. The City will conduct inspections of commercial centers multiple times a year to assure compliance.

Finally, the City has installed structural controls at Bustamante and one at Guerrero. These structural controls will be cleaned monthly.

Also, in an effort to address floatables, the City enforces its Commercial Litter Ordinance to address litter from commercial shopping centers. The City conducts inspections throughout the year.

**Floatables**

Measurable Goal~~s 2019 2024~~

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Cleaning of MS4 by Vacuum Truck (20,000 LF per month) | Weekly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |
| Commercial Litter Ordinance Inspections | Bi-yearly (twice per year) | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |

| | | | |
|---|---|---|---|
| CCTV Inspection of MS4 (2,000 LF per month) | Weekly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |
| Cleaning of Structural Controls (Guerrero & Bustamante) | Monthly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |

## Roadways

In order to improve driving conditions and reduce pollutants entering the MS4 from un-maintained streets, a street maintenance program was developed. This program is intended to keep the state of the local streets in superior condition.

This program has been in effect for the repair and maintenance of city streets for transportation purposes for many years. However, the program is now also utilized to decrease pollutants entering the MS4 and the associated storm water. This program utilizes twelve~~eighteen~~ (12~~8~~) street sweepers that maintain the City streets, concentrating on the major through fares within the City. Major streets are cleaned at least once per week, with problem areas such as downtown cleaned on a daily basis.

This program also involves pothole repair, which utilizes seven (7) pothole-patching trucks that respond to citizen complaints as well as patrol the City for problem areas.

Any city employee involved in street asphalt breaking in order to repair underground infrastructure has been and will continue to be trained to apply BMPs during such activities, such as covering and containing piles of dirt and/or trash in order to prevent or minimize the possibility of storm water runoff traveling down the street curves and running into storm inlets, creeks, channels, and/or any other MS4 structure. After finishing, covering the hole, and replacing the asphalt/concrete, the area will be cleaned up and any leftover dirt and/or trash will be removed and disposed appropriately.

**Roadways**

Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Street Sweeping | Weekly | Starts immediately and reported December 2020 and then annually | Public Works Department |

## MCM 2 Post-Construction Storm Water Control Measures

### Implementation and Enforcement of Controls to minimize discharge of pollutants from areas of new development and significant redevelopment

In June 1999, the City of Laredo adopted its storm water ordinance (Ordinance No. 99-O-186) which was amended in 2012 to include one (1) acre or more sites to protect, maintain, and enhance the public health, safety, and general welfare by establishing minimum requirements and procedures to control the adverse impacts associated with storm water runoff. Proper management of storm water runoff will minimize damage to public and private property, reduce the effects of development on land and stream channel erosion, assist in the attainment and maintenance of water quality standards, reduce local flooding, and maintain after development, as nearly as possible, the pre-development runoff characteristics. The City's storm water ordinance and the related guidance document address BMPs that will be used in areas of new development and significant redevelopment. The ordinance requires the developer to sign a standard maintenance and monitoring agreement ("MMA") for any storm water facilities and BMPs constructed as part of the development process.

The Storm Water Management Ordinance requires that a storm water management permit be obtained from the City for all land disturbances of one (1) or more acres. The permit requires Storm Water Pollution Prevention Plans ("SWPPPs") for proposed major construction, minor construction, street/road construction, and trenching and filling projects. Inspections of construction sites for compliance are also covered by the ordinance.

Additionally, each permit requires the following:

- Completion of the City's standard Storm Water Pollution Prevention ("SWPP") permit application form which includes a Storm Water Pollution Prevention Plan ("SWPPP").
- Site, vicinity, contour, and drainage map.
- Erosion control plans, methods and practices, as part of the SWPPP.
- Work schedule.
- Application process fee.
- A copy of the TPDES storm water discharge Notice of Intent ("NOI") application and the approved permit, if the site is one (1) acre~~s~~ or more.
- Estimates, in dollar amount, to develop and implement this permit requirement.

All engineering consultants, and/or developers involved in the planning and/or clearing of (one) 1 or more acres of land for the purpose of constructing residential, commercial, or industrial developments are required to prepare and distribute to all contractors and subcontractors involved a copy of the SWPPP, which is specific for the proper storage and handling of construction hazardous materials, the proper construction or placement of project site operational and practical erosion and run-off prevention controls, and the proper implementation of any other required SWPPP BMPs at the project area. The SWPPP should also describe the need for the developer to obtain storm water discharge permit coverage from TCEQ through the submission of an NOI. In addition, the SWPPP should include the name of the General Project Manager, his/her responsibilities, and the construction site self-inspection check list or evaluation, which the project manager should conduct in order to make sure the construction site meets all local and state storm water regulations and stays in compliance.

During construction, City Inspectors visit the construction sites routinely to inspect~~ed~~ for compliance with the SWPPP and to inspect BMPs for effectiveness. Inspectors may issue citations for non-compliance to ensure the reduction of sediments from erosion entering the MS4.

Upon final inspection of construction sites, residential sites must provide a two (2) year warranty where the Developer is responsible for the maintenance of structural control BMPs. After those two years the City is responsible for maintaining the BMPs through the Public Works Creek Cleaning Division. On commercial sites, the City requires a Maintenance and Monitoring Agreement ("MMA") for the long-term maintenance of BMPs.

Environmental & Solid Waste Services Department inspectors visit all public and private Structural Controls/BMPs at least once per year to assure compliance with maintenance schedules. Moreover, the City will assess receiving water bodies for the effectiveness of these controls and take corrective actions through improvements (for public facilities) or require private facilities to take corrective actions through the enforcement of the MMA.

**Post-Construction Storm Water Control Measures**
Measurable Goals ~~2019-2024~~

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Review of Master Plans, Development Plans, and SWPPPs | Bi-Monthly (twice per month) | Starts immediately and reported December 2020 and then annually | ~~Building Services Department,~~ Engineering Department, Environmental & Solid Waste Services Department |
| Inspections of Construction Sites | Weekly | Starts immediately and reported December 2020 and then annually | Engineering ~~Building Services~~ Department |
| Inspection of Flood Control Structures | Once per year | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department, Engineering Department~~, Building Services Department~~ |
| Assessment of Impacts on Receiving Waters | Once per year | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department, Engineering Department~~, Building Services Department~~ |
| Cleaning and Maintenance of Structural Controls | Monthly | Starts immediately and reported December 2020 and then annually | Public Works Department, Environmental & Solid Waste Services Department |

## MCM 3 Illicit Discharge Detection and Elimination

### Prohibition of illicit non-storm water discharges from entering the MS4

The City has two main ordinances that prohibit illicit non-storm water discharges from entering the MS4: the Water Pollution Prevention Ordinance and the Illegal Dumping Ordinance. The Environmental & Solid Waste Services Department has four (4) full time staff to investigate and enforce cases involving illicit non-storm water discharges. These staff members are responsible for routine inspections of industrial storm water permits and~~,~~ mechanic shop inspections, as well as hazardous materials permit inspections. Moreover, these staff members respond to and investigate 311 calls from the public regarding cases of illicit discharges and illegal dumping. The enforcement staff works closely with Environmental & Solid Waste Services staff who~~that~~ conduct dry-weather and wet-weather screening as well as with staff that utilize CCTV to inspect the MS4 for illicit discharges from illegal connections.

**Prohibition of illicit non-storm water discharges**
Measurable Goals ~~2019-2024~~

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Citizen Complaints via 311 | Weekly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |
| Dry weather screening | 20% of the MS4 per year | 20% each year to be reported in December 2020 and then annually | Environmental & Solid Waste Services Department |
| Wet weather screening in four (4) watersheds | Bi-annually (twice per year) | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |
| Inspections of Hazardous Material Permittees | Inspection of permittees quarterly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |
| High Risk Industrial Storm Water Inspections | Three (3) times per year | Will be inspected once prior to October 15, 2020, and then annually | Environmental & Solid Waste Services Department |

### Miscellaneous, non-storm water discharges that are authorized

The City has an online non-storm water discharge permit process where the following allowable discharges can be reported so that staff can review and follow up:

A) water line flushing;
B) landscape irrigation;
C) diverted stream flows;
D) rising ground waters;
E) uncontaminated ground water infiltration;

F) uncontaminated pumped ground water;
G) discharges from potable water sources;
H) foundation drains;
I) air conditioning condensation;
J) irrigation water;
K) springs;
L) water from crawl space pumps;
M) footing drains;
N) lawn watering;
0) street wash water;
P) individual residential vehicle washing;
Q) wash waters using only potable water, and which are similar in quality and character to street wash water or individual residential vehicle washing but without the use of detergents or surfactants;
R) flows from riparian habitats and wetlands;
S) dechlorinated swimming pool discharges;
T) other allowable non-storm water discharges listed in 40 CFR § 122.26(~~-~~d)(~~-~~2~~-~~)(iv~~-~~*)(B)(1);*
U) other allowable non-storm water discharges listed in the TPDES Construction General Permit No. TXR150000 and TPDES Multi Sector General Permit No. TXR050000; and
V) other similar occasional incidental non-storm water discharges

If discharges from fire-fighting activities are identified as significant sources of pollutants the City of Laredo will notify TCEQ within 24 hours. Moreover, if an individual non-storm water discharge otherwise exempted under this section is found to be contributing significant amounts of pollutants to the MS4 the City will take enforcement actions under the City's Water Pollution Prevention Ordinance.

## Overflows and Infiltration

Wastewater overflow in collection systems occurs predominantly due to obstructions in lines that limit the carrying capacity of the line. Some overflows are also the direct result of excessive flows due to demand and usage of an inadequate pipe size or due to the fact that rain infiltrates through cracks and faulty gaskets creating a demand, which supersedes the capacity of the line. In areas where septic tanks are prevalent, they usually overflow during prolonged periods of persistent rain. Finally, a corroded or cracked pipe can leak to the surrounding areas during periods of high flow. Overflowing wastewater generally ends up in the storm water system where it stays until a significant rain event flushes the pipes.

The City has experienced overflows due to obstructions, which overwhelm~~s~~ the system's capacity. The overflows have primarily occurred as a consequence of grease, paper, rags, wipes and other incidental objects that fall in or are maliciously introduced into the lines. Also, roots in the lines are occasionally the cause of sewage backups or manhole overflows. The older sections of town, including the downtown area, are suspected to have a number of illegal connections to the storm sewers, since they are usually found to have a strong sewer odor within a given area.

The City has responded to these problems by undertaking an ambitious lift station overhaul program, acquiring an additional vacuum truck for maintenance tasks, developing an inspection and enforcement program for restaurants, schools, and other grease generators, and by selecting stricter standards for construction materials in the collection system. Presently, a sewage

overflow is immediately vacuumed and removed or disinfected with granular chlorine on its route to the storm sewer.

In order to minimize the number of wastewater overflows, the City provides the following:

- Grease Control – Continued inspections of food preparation establishments for proper grease trap capacity and maintenance.
- Line Obstructions – A vacuum truck will be assigned exclusively to preventative maintenance of lines in the areas where historic data shows recurring problems.
- Line Maintenance Information Management – The existing computerized database will be refined to incorporate tasks that will allow the department to issue work orders upon certain frequency of events.
- The Utilities Department conducts a citywide educational campaign, utilizing all conventional types of media (TV, Radio, Bill Boards, Utilities Billing Mail, etc.), issuing educational pamphlets at local schools, and utilizing any electronic social media available to the City, in order to inform the public in general about the proper disposal alternatives for waste cooking grease, used wipes, and other items usually thrown in the sinks and toilets. The Utilities Department will also be giving out special grease disposal bags to the public.

In the event of a wastewater overflow, the Utilities Department Wastewater Collection Division will dispatch a vacuum truck to collect as much of the spill as possible, then a crew equipped with granular chlorine will apply it to the storm water inlet in an amount proportional to the perceived spill. Laboratory data will be generated to determine an appropriate ratio of chlorine to sewage. The chlorine applied is used to minimize coliform count and reach acceptable levels for discharge while not exceeding the chlorine amount that can be placed in the receiving stream. Simultaneously, the Environmental & Solid Waste Services Department field investigators will be notified via a 24-hour hot line for an immediate assessment of the volume and type of discharge being discharged into the storm sewer. The investigators then will determine whether additional remediation actions are necessary.

The City's Utilities Department utilizes several crews to operate vacuum trucks and these are available on a 24 hour/7 day schedule. The Utilities Department also has crews that conduct CCTV inspections as well as smoke and/or dye tests on wastewater lines to identify leaks or illegal connections in the system.

In identifying infiltration to the MS4, the Environmental & Solid Waste Services Department utilizes a CCTV inspection system to inspect our MS4 for infiltration from sanitary sewer lines as well as illicit connections. This is done on existing lines and on areas of new development to ensure that there are no defects in areas of new development before the City accepts a new subdivision.

**Overflows and Infiltration**
Measurable Goals ~~2019-2024~~

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| CCTV Inspection of MS4 | Weekly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |

| | | | |
|---|---|---|---|
| Cleaning of Sanitary Lines by Vacuum Trucks | Weekly | Starts immediately and reported December 2020 and then annually | Utilities Department |
| Inspection of Sanitary Lines | Weekly | Starts immediately and reported December 2020 and then annually | Utilities Department |

## Household Hazardous Waste and Used Motor Vehicle Fluids

In an effort to decrease the risk of contaminating storm water and surface water, the City has developed a community-based household hazardous waste (“HHW”) collection and education program aimed at increasing community awareness and participation in proper disposal of HHW. This program is intended to provide education on HHW through a mass media campaign, as well as to conduct biannual HHW collection events in addition to maintaining a permanent Household Hazardous Waste Collection Facility (“HHWCF”).

In order to deal with HHW generated by the citizens of Laredo, the Environmental & Solid Waste Services Department has implemented a HHW Collection Program, which includes a permanent residential hazardous waste drop-off facility as well as a couple of collection events per year that take place in the spring and fall. This program has been extremely effective in reducing the improper disposal of HHW. Over the years, the Environmental & Solid Waste Services Department has sustained a gradual increase in cost to support this successful program by faithfully budgeting the accounts that sustain the transportation and disposal fees involved in running this program. Part of the budget is dedicated for education and awareness campaigns for the program. The program has collected and properly recycled, reused, and disposed of over a million pounds of HHW materials since the program’s inception.

Due to its tremendous success, the Environmental & Solid Waste Services Department proudly supports and grows this program and will continue to host biannual collection events as well as continue operations at the permanent HHWCF~~facility~~.

In an effort to reduce the hazards of storm water and surface water contamination by the indiscriminate dumping of used oil, a used oil recycling program was established in the City of Laredo. This project implemented a community-wide oil recycling system and an educational program directed at increasing community knowledge and participation in the used oil recycling program. This program has been in place since May 1994.

The used oil recycling program consists of neighborhood drop-off stations throughout the City. The City has acquired four (4) 450-gallon neighborhood collection bins for placement in neighborhoods throughout the City, one trailer and collection tank to pick up used oil from the neighborhood collection sites, and a central collection tank located at the Department of Public Works to act as the primary collection facility. The used oil is received by a contracted oil recycling company, which is responsible for analyzing for contaminants, recycling, and/or proper disposal. The Recycling Coordinator provides community education at local schools (as part of presentations on recycling) and on the City’s Public Access TV channel. Also, literature on oil recycling is distributed at community and school events, along with free individual spill resistant oil change receptacles.

The City currently accepts used oil at various locations distributed throughout the City, using the neighborhood collection bins. Currently, the neighborhood collection bins are found at the following locations:

**City of Laredo Landfill**
2 miles East of the Intersection of HWY 359 & Loop 20 on Hwy 359
**Fire Station #3 (Civic Center)**
2420 San Bernardo Avenue
**Fire Station # 9**
11700 Mines Rd.
**Department of Public Works**
5512 Daughtery

**Household Hazardous Waste and Used Motor Vehicle Fluids**
Measurable Goals ~~2019-2024~~

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Operation of the Household Hazardous Waste Collection Center | Advertisement ~~t~~Twice per year in print and television media. Social media advertisement four times per year. Information on collection center available on the ~~e~~Environmental ~~s~~Services website and S~~s~~olid W~~w~~aste website. | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services, Public Information Office~~, and Solid Waste Department.~~ |
| Maintenance of Used Oil Recycling Centers | Weekly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |

## MS4 Screening and Illicit Discharge Inspections

The MS4 screening program consists of developing a map of the Storm Sewer System for the City of Laredo, locating all storm water outfalls, including major outfalls, and choosing representative field screening points which will attempt to cover 100% screening. The task of sampling all the storm water outfalls will be divided into five (5) annual screening projects of 20% per year. A study on dry weather flow will be performed by collecting samples for laboratory analysis and drawing conclusions on the basis of field and laboratory results. Based on each year's laboratory test results, the environmental technicians will gradually add the task of resampling those outfalls suspected of having illicit discharges to the 20% storm water outfall screening project for that particular year.

A team of technicians will be assigned the task of selecting the outfalls to be tested, taking grab samples from the outfalls, transporting the samples to our headquarters, and performing the corresponding storm water outfall screening tests. Selection of the outfalls to be sampled will be based on the existing numeric identification system of the outfalls. A CHEMetrics™ analysis kit equipped with specific ampoules will be utilized for the analysis of ammonia, total chlorine, total copper, detergents, and total phenols. Also, an Orion M1230 microprocessor based multiprobe meter will be utilized to measure pH, conductivity, temperature, dissolved oxygen (DO), and salinity. Finally, a Quanti-Tray / 2000 with Colisure Test will be utilized to estimate *E. coli* numbers. The designated technicians will follow all necessary QA/QC measures. The dry weather screening schedule is devised to increase productivity by having technicians attend outfall locations in close proximity to one another on a regular basis. The program will be conducted in specific months of every year. All samples will be collected after at least a 72-hour period of dryness between storm events.

As previously mentioned, the Environmental & Solid Waste Services Department conducts CCTV inspections on the MS4 to identify illicit discharges weekly.

**MS4 Screening and Illicit Discharge Inspections**
Measurable Goals ~~2019-2024~~

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Dry Weather Inspections | 20% of the MS4 per year | 20% each year to be reported in December 2020 and then annually | Environmental & Solid Waste Services Department |

## Priority Areas

Within one year from the date of permit issuance, the City of Laredo will develop a list of priority areas likely to have illicit discharges. The City will continue to evaluate and update this list each year and report the results in the annual report.

**Priority Areas**
Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Priority Area List | Develop a priority area list within one year. Update list each year. | October 15, 2020 and then review and report annually | Environmental & Solid Waste Services Department |

## NPDES and TPDES Permittee List

The Environmental & Solid Waste Services Department maintains a list of NPDES and TPDES industrial permittees and the Engineering~~Building Services~~ Department maintains a list of NPDES and TPDES construction permittees. These are updated as needed or on a monthly basis.

**NPDES and TPDES Permittee List**
Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| NPDES and TPDES Permittee List | Update list monthly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department, Engineering ~~Building Services~~ Department |

## MS4 Mapping

The Environmental & Solid Waste Services Department utilizes various technologies and equipment to prevent contaminants from entering the MS4. To address the prevention of contaminants as well as implementing the Department's programs, the "what," "where," "when," and "how many" questions are regularly answered by the development and use of the City's storm water Geographical Information System (GIS).

The primary use of the Department's GIS has been for the storm water management program. Every year, the department conducts storm water screening and monitoring activities at numerous locations where water exits the man-made portion of the MS4 and enters the natural environment of creeks and the Rio Grande. Database development is supported through the use of GPS (Global Positioning System) technology, drainage project as-builts, and storm system sub-surface camera investigations.

In 2010, in an effort to consolidate resources and to better serve internal and external clients, storm water GIS personnel and equipment were relocated from the Environmental & Solid Waste Services Department to the City's Building Department. Storm Water GIS personnel and equipment were more recently relocated to the City's Engineering Department.

The Engineering~~Building Services~~ Department will update the GIS system monthly to reflect additions to the MS4. This is done by requiring as-builts for newly completed development and field inspections. Older data is updated when information is obtained by CCTV inspections and camera pole inspections.

**MS4 Mapping**
Measurable Goals ~~2019-2024~~

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| MS4 Mapping | GIS system will be updated monthly | Starts immediately and reported December 2020 and then annually | Engineering ~~Building Services~~ Department |

## Spill Prevention and Response

An internal municipal storm water pollution prevention program has been implemented in order to train city employees who work within specific city departments that have a higher chance of having accidental chemical spills, which in turn may run off to the local MS4 and potentially pollute the

City's main waterways. Some of these departments include Public Works, Utilities, ~~Solid Waste,~~ Fleet, and the Parks & Recreation ~~D~~departments. The program includes having Environmental & Solid Waste Services Department personnel conduct regular employee trainings at each of the identified departments in order to teach or refresh the employees on the most current BMPs available. Such BMPs include good housekeeping, spill prevention and response techniques, proper vehicle and equipment washing and maintenance techniques, proper spill reporting, MS4 protecting street maintenance techniques, pollution preventing outdoor storage of materials and wastes, and non-polluting landscaping and lawn care techniques.

Moreover, the City of Laredo Fire Department is responsible for the management and cleanup of hazardous material spills that pose an imminent threat to life or property or where permitted hazardous materials are involved. The Fire Department follows standard operating procedures when responding to spill situations. If the spill is located on private property, hired contractors will clean up and dispose of the spill material accordingly; however, if the spill occurs on the right-of-way, the Fire Department will properly clean up and dispose of the spill waste material.

In addition to ensuring that the private contractor or fire department spill clean-up crews contain, clean up, and properly dispose of the collected spilled waste material, the Environmental & Solid Waste Services Department may assists with advice or physically applying pollutant containment BMPs in order to prevent the pollutant from running down into storm inlets, channels, creeks, etc. ~~.~~ Additionally, the City has implemented a program to deal with hazardous waste generated and stored by conditionally-exempt small quantity generators ("CESQGs") and small businesses. This program has been in existence since 1999, and over the years, the City has assisted with the proper collection and disposal of a significant~~ly large~~ amount of hazardous waste from CESQGs ~~generators~~. Furthermore, through the Hazardous Materials Permitting Division, the City has coordinated the proper disposal of thousands of pounds of hazardous abandoned material that had accumulated in many of the local warehouses. The City currently conducts quarterly training for hazardous materials handling and spill prevention and has trained ~~-~~a large number of people since 2001.

**Spill Prevention and Response**
Measurable Goals ~~2019-2024~~

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Spill Prevention Training | Quarterly | Starts immediately and reported December 2020 and then annually | Various City Departments |
| Hazardous Materials Handling Training | Quarterly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |
| Inspections of Hazardous Material Permittees | Inspection of permittees quarterly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |
| CESQG Collection Program | Yearly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |

# MCM 4 Pollution Prevention and Good Housekeeping Program

## Pollution Prevention and Good Housekeeping

The City has identified various City activities that could potentially affect the MS4 and has expedited activities to prevent pollution impacts to the MS4. The City conducts:

- Street Sweeping for City construction projects, in addition to an annual schedule for City-wide sweeping;
- Right of way mowing and mowed grass collection and removal;
- Storm system maintenance and cleaning, including detention facilities, on site detention ponds, and outfalls;
- City owned creeks and channels maintenance by City personnel and/or contractors;
- Commercially or p~~P~~rivately owned creeks and channels maintenance scheduled inspections by City personnel to make sure private owners perform their contract agreed maintenance duties;~~.~~
- Parks cleaning/mowing maintenance and regular emptying of trash disposal container dispensability at all parks;
- Special p~~P~~et waste disposal containers maintenance and continual replacement of collection bags at City parks;
- Integrated Pest Management (IPM) plan development at parks and other city owned open space areas;
- As part of the IPM plan, any private contracted commercial applicator shall have to follow all pesticide, herbicide, and fertilizer application rules o~~i~~n city property;
- Proper collection and disposal of accumulated storm water runoff waste;
- Landfill erosion and solid waste control maintenance;
- Municipal curbside solid waste activities;
- Wastewater and water treatment facility storm water protection operations;
- Operation and maintenance of lift stations.
- Implementation of training and BMPs to reduce pollutants from equipment yards (sand filters at Public Works), road repair activities, and maintenance facilities.

In addition to these identified activities, the City has developed a Storm Water Protection Guidance Manual for public and private projects.

In general, the City's programs to operate and maintain City ~~-~~-owned structural and non-structural BMPs, as outlined in this SWMP, have been and continue to be fully implemented.

Moreover, the City has implemented training programs that include employee training with the ultimate goal of preventing or reducing pollutant runoff from municipal operations. Training Programs inform public employees of the impacts associated with illegal discharges and improper disposal of waste from municipal operations.

The Environmental & Solid Waste Services Department provides an annual storm water pollution prevention BMPs and good housekeeping techniques training for City employees who work ~~o~~in departments which perform mechanical maintenance work in City vehicles, handle and/or store potential polluting materials on their yards, and/or operate a significantly large fleet of regular or large/heavy vehicles. Such City departments include Fire, Utilities, Public Works, Police, Fleet Maintenance, Parks & Recreation, and Health.

In order to minimize excessive pesticide application and/or over fertilization of public green areas, which may contribute to run off pollution of our waterways, the Parks Department with collaboration of Environmental & Solid Waste Services Department personnel will continue to provide ~~–~~proper pesticide and fertilizer application trainings to any City employee and/or contracted individuals who apply pest control and plant growth materials on any public green areas. These techniques include focused BMPs, following label requirements, avoiding/minimizing the use of extremely hazardous pesticides, and utilizing non-pesticide application techniques whenever possible.

The Utilities and Public Works departments, with cooperation from the Environmental & Solid Waste Services Department, will continue to train their personnel on how to best apply storm water pollution runoff prevention BMPs whenever they have to conduct fixing or maintenance work on any part of the MS4.

Overall, through the City's compliance with Phase I of the NPDES/TPDES regulations, training of City personnel is conducted by individual departments and emphasizes prevention and reduction of pollutant runoff from municipal operations.

Finally, the City is currently implementing a program for structural control maintenance where the City inspects all public and private facilities and is requiring a maintenance schedule for these facilities. The City will enforce these maintenance schedules on privately owned facilities through Maintenance and Monitoring Agreements ("MMAs"). This program will be fully implemented within one year of the issuance of the City's permit.

**Pollution Prevention and Good Housekeeping**
Measurable Goals ~~2019-2024~~

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Street sweeping | Weekly | Starts immediately and reported December 2020 and then annually | Public Works Department |
| Right-of-Way Mowing | Weekly | Starts immediately and reported December 2020 and then annually | Public Works Department |
| Inspection of Privately-owned Facilities to Ensure Maintenance | Inspections will be conducted once per year | All inspections will be completed by October 15, 2020, and then annually thereafter | Environmental & Solid Waste Services Department |
| Parks Cleaning/Mowing and Removal of Trash | Daily | Starts immediately and reported December 2020 and then annually | Parks and Recreation Department |
| Pet waste disposal containers maintenance | Weekly | Starts immediately and reported December 2020 and then annually | Parks and Recreation Department |

| | | | |
|---|---|---|---|
| Integrated Pest Management ("IPM") plan development and review | Develop an IPM plan within one year. Review yearly. | IPM plan will be developed by October 15, 2020. Reviewed annually thereafter. | Parks and Recreation Department |
| Collection of municipal trash | Weekly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |
| Landfill erosion and solid waste control maintenance | Weekly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |
| Maintenance of lift stations | Weekly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |
| Training of Employees | Quarterly training will be provided | First training will be held prior to October 15, 2020, and then quarterly thereafter | Environmental & Solid Waste Services Department, ~~Solid Waste Department,~~ Utilities Department, Parks and Recreation Department, Public Works Department, Fleet Department |

## Waste Handling

Sediment and floatables collected through the implementation of MS4 maintenance BMPs are disposed of properly. Waste materials collected are weighed and disposed of at the City's permitted landfill. Any automotive fluids, *e.g.*, oil or antifreeze, collected through vehicle maintenance operations are disposed of through contracted services.

Overall, through the City's compliance with Phase I of the NPDES/TPDES regulations, waste disposal from maintenance of the City MS4 and other municipal activities is completed in accordance to applicable waste regulations.

**Waste Handling**
Measurable Goals ~~2019-2024~~

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Weighing of waste materials removed from the MS4 and disposed at the City's permitted MSW landfill | Weekly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department, Public Works Department |

## Pesticide, Herbicide, and Fertilizer Application

Certain water quality problems can be traced to pollutants associated with pesticides, herbicides, and fertilizers (“PHFs”). Pesticides and herbicides in storm water runoff can degrade water quality and often have a toxic effect on sensitive organisms even at very low concentrations. Fertilizers are also capable of degrading water quality. Excessive phosphates, nitrates, and other nutrients in water bodies may create a eutrophic condition, which may lead to an excessive growth of microscopic organisms, such as algae, which in turn leads to excessive oxygen consumption required to sustain their growth, which in turn reduces dissolved oxygen levels (anoxic condition) necessary to sustain aquatic life.

Manufacturers of pesticides conduct extensive research in developing the optimum pesticide dosage and application conditions to minimize the environmental impact. By law, pesticides must contain the manufacturer's directions for use. Compliance with application directions is the critical condition for effectively controlling pesticides. Application is almost exclusively under human control and rarely, if ever, automated. Hence, regardless of how diligent a manufacturer is in formulating and communicating usage instructions, the release of pesticides outside of any given target area is likely if the instructions are not read/learned and followed. This applies to all users including homeowners, professional applicators, and municipal employees.

Hence, the key element in controlling the release of PHFs into the storm water system is to ensure, to the maximum extent possible, that applicators have sufficient knowledge of their proper use. Basically, the means of instruction falls into two categories: public education and licensing programs, both of which are part of a good Integrated PHF Management Program. A well-Integrated PHF Management program follows an approach which evaluates different control options for the regulation of weed growth, horticultural diseases, insects and others. PHF Management is based on effectiveness, environmental impact, site characteristics, economics and worker/public health and safety. Control options include biological, cultural, manual, mechanical and chemical methods to prevent, or remedy unacceptable pest activity or damage. A PHF Management Program utilizes all appropriate pest management options. The goal of a PHF Management system is to manage pests and the environment to balance benefits of control, costs, public health, and environmental quality.

The PHF Management Program is currently being administered by the Parks and Recreation Department in collaboration with the Public Works, Health, and Environmental & Solid Waste Services dDepartments.

The purpose of a PHF Management Program is to efficiently and effectively protect lives, property, and the environment of our community by reducing the impact of flooding, erosion and water pollution potentially caused by the runoff of different types of pollutants including PHFs which may enter the City’s MS4 and ultimately into the watershed receiving waters. The IPM Program also assists our City in maintaining compliance with state and federal rules regarding the application of pesticides (including herbicides, insecticides fungicides, and rodenticides on City property. This IPM program will be implemented within one year of the issuance of our permit.

Additionally, the City will develop an Integrated Pest Management (IPM) within one year of our permit issuance where all new commercial development will need to submit an Integrated Pest Management Plan as part of their Maintenance and Monitoring Agreements (MMA). This will discharge pollutants over lands not owned by the City of Laredo.

**Pesticide, Herbicide and Fertilizer Application**
Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Integrated Pest Management ("IPM") plan development and review | Develop an IPM plan within one year. Review yearly. | IPM plan will be developed by October 15, 2020. Reviewed annually thereafter. | Parks and Recreation Department |

## List of Municipal Facilities

The City's Zacate Creek Waste Water Treatment Plant(WQ0010681002), Southside Waste Water Treatment Plant (WQ0010681003), ~~-~~North Laredo Waste Water Treatment Plant (WQ0010681004), Colombia Bridge Waste Water Treatment Plant(WQ0010681006), Jefferson Water Treatment Plant (WQ0010681001), Penitas Waste Water Treatment Plant (WQ0010681007), Sombreretillo Waste Water Treatment Plant (WQ0010681008), ~~and~~ Unitec Waste Water Treatment Plant(WQ0010681005), and Manadas Creek Waste Water Treatment Plant (WQ0015501001) are permitted and remain in compliance. Additional permitted facilities are the City of Laredo MSW Landfill (TXR05DC19), the Ponderosa Regional Landfill (TXR05ET01), and the Laredo International Airport (TXR05V022), all of which remain~~s~~ in compliance.

## MCM 5 Industrial and High Risk Runoff

## Programs to identify and control pollutants in storm water discharges

## Industrial Storm water Compliance Program

The City has implemented a compliance program for the monitoring and compliance of industries within the City of Laredo by passage of a city ordinance. The City of Laredo initiated an education campaign targeting industrial facilities and staff in an attempt to educate and inform industries of the necessity to comply with the former NPDES, now TPDES, required industrial storm water discharge permit, and advising them of the City Ordinances mandating compliance. Industrial facilities must prepare a comprehensive Storm Water Pollution Prevention Plan ("SWPPP"), which will facilitate the performance of all tasks necessary to comply with current TCEQ guidelines for storm water discharges. Industrial facilities which store/handle hazardous materials will also be required to comply with the City's Hazmat Ordinance.

Personnel from the Environmental & Solid Waste Services Department will conduct site inspections of the facilities to identify if a Notice of Intent ("NOI") has been submitted or a permit has been issued, and to determine compliance with the City Ordinances. The Environmental & Solid Waste Services Department will also address any concerns and discuss possible options the facility owner(s) and staff might have. Industrial facilities will be prioritized according to their potential for pollution production and discharge. The Environmental & Solid Waste Services Department will determine which facilities will be inspected more frequently according to their previous inspection records and the amount of pollution being discharged. Inspections will be unannounced and the Environmental & Solid Waste Services Department inspectors will follow a standardized inspection sheet, which will cover all the necessary attributes for compliance. If a

facility is found to be in non-compliance, the proprietor will be notified, given a Notice of Violation(s) ("NOV"), and/or cited. The operator will further be required to initiate a remediation program within thirty (30) days and be in full compliance within sixty (60) days from the date of notification and/or citation or face further legal enforcement including severe fines.

A database of active industrial facilities will include a risk level value for each of the facilities. The risk level will consist of a simple three number system (1-3) with the number one (1) being low risk, the number two (2) being medium risk and the number three (3) being high risk. All number 3 risk level facilities will be inspected three (3) times per year.

Facilities with inadequate inspection results will be visited monthly until compliance is obtained and then two (2) to four (4) times yearly until analytical sampling and inspection results show continuous compliance for six (6) months, after which inspection intervals will revert back to yearly at a minimum. Additionally, the City shall review monitoring data submitted for facilities under any TPDES storm water permit, EPCRA Title III, Section 313 industrial facilities, and hazardous waste treatment, disposal, and recovery facilities. Sites under this designation will be inspected quarterly.

Any operator found to be in noncompliance will be required to submit a revised SWPPP which includes, at a minimum the following items:

| | |
|---|---|
| Pollution prevention team | Description of pollutant sources |
| Drainage area and calculations | Inventory of exposed materials |
| Spills and leaks | Sampling data |
| Risk identification | Summary of potential pollutant sources |
| Measures and controls | Good housekeeping requirements |
| Preventive maintenance | Spill prevention & response procedures |
| Internal inspections | Employee training |
| Non-storm water discharges | Record keeping and internal reporting |
| Sediment and erosion control | Management of runoff |

**Industrial Storm Water Compliance Program**

Measurable Goals ~~2019-2024~~

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Inspections at MSW landfill for compliance with TPDES storm water permit | Once per year | Will be inspected once prior to October 15, 2020, and then annually | Environmental & Solid Waste Services Department~~, Solid Waste Department~~ |
| High Risk Industrial Storm Water Inspections | Three (3) times per year | Will be inspected once prior to October 15, 2020, and three times per year~~then annually~~ | Environmental & Solid Waste Services Department |
| Inspection of EPCRA Title III, Section 313 facilities | Quarterly | Will be inspected quarterly in each permit year | Environmental & Solid Waste Services Department |

| | | | |
|---|---|---|---|
| Develop and maintain a list of active industrial facilities identified by risk level | Develop list by December 2020 and then update twice per year | List will be developed by December 2020 and then updated twice per year | Environmental & Solid Waste Services Department |

## Landfill's Storm Water Discharge Monitoring Program

The City of Laredo owns and operates two~~one~~ (2~~1~~) Type 1 municipal solid waste landfills.

The City of Laredo MSW Landfill, which is situated approximately 1.96 miles east of the LOOP 20 and SH-359 intersection. This 200-acre permitted landfill, TCEQ Permit No. MSW-1693A, has been in operation since 1986 and had an initial design lifespan of twenty (20) years. The City has received a permit amendment that will extend the lifespan of the landfill fifteen (15) years. The City developed a SWPPP in compliance with the requirements of the TPDES Multi-Sector General Permit (MSGP), TPDES Permit No. TXR050000, obtaining authorization No. TXR05DC19 effective November~~December~~ 15~~2~~, 201~~0~~6. The SWPPP and sampling activities at the City's MSW landfill are in compliance with the MSGP.

The City has implemented major modifications to comply with Subtitle D requirements, including a new cell liner, ground water monitoring wells, a leachate collection system, and erosion control practices. The City of Laredo Environmental & Solid Waste Services Department maintains compliance with the SWPPP.

The City owns and operates a second MSW landfill – the Ponderosa Regional Landfill, TCEQ Permit No. MSW-2286. The Ponderosa Regional Landfill is a 499-acre permitted Type I MSW landfill with a disposal footprint of approximately 347 acres. It has been in operation since 2013 and has a design life span of approximately 94.3 years. The City purchased the Ponderosa Regional Landfill in 2020. A SWPPP has been developed for the Ponderosa Regional Landfill in compliance with the requirements of the TPDES MSGP. The MSGP authorization number assigned to the Ponderosa Regional Landfill is TXR05ET01. The SWPPP and sampling activities at the Ponderosa Regional Landfill are in compliance with the TPDES MSGP, Laredo ordinances, and the Laredo MS4 permit.

**Landfill~~'~~s' Storm Water Discharge Monitoring Program**
Measurable Goals ~~2019-2024~~

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Inspections at MSW landfills for compliance with TPDES storm water permit | Once per year | Will be inspected once prior to October 15, 2020, and then annually | Environmental & Solid Waste Services Department~~, Solid Waste Department~~ |

## MCM 6 Construction Site Storm Water Runoff

### Program to reduce discharges of pollutants into the MS4 from construction sites.

Reduction of pollutants such as sediment into the MS4 begins with the Subdivision Plat Approval process, where City staff reviews construction plans and reports for proposed public improvements of a submitted plat. The importance of the process is to assure Subdivisions meet all Local, State, and Federal Guidelines and Ordinances (such as the City's Storm Water Management Ordinance). Engineers representing the Subdivision are responsible in assuring that all required submittals such as Construction Plans, SWPPPs, and Reports be presented to the One Stop Shop ("OSS") Committee for review and approval. The OSS meets every two (2) weeks and reviews these plans to make sure that the proposed development meets all legal requirements. If deficiencies in the plans are found, the consulting engineer of the subdivision or commercial site is notified and the process is not allowed to continue until an approval letter is issued by the City. Once all approval letters are issued the project is allowed to continue after a preliminary approval of the Planning and Zoning Commission is granted. Inspection staff are assigned to the project after this initial approval. The next step for a development is to file an NOI with the State and this NOI must be submitted to the City, and proof (followed up by an inspection) of the implementation of BMPs such as silt fencing, so that a Clearing and Grubbing Permit is issued. Afterwards, a pre-construction meeting is held with the developer and staff to review the project and discuss any issues with the development. As construction begins staff periodically visits the site to assure compliance with City engineering standards as well as to ensure storm water BMPs are maintained and functioning as designed. If deficiencies are observed, inspectors will require the developer to correct them. If deficiencies are not corrected, staff inspectors may issue Stop-Work-Orders or citations. Upon completion of the development, the City holds a pre-final construction meeting with the developer to inspect the site for compliance with the City's engineering standards and storm water BMPs. If deficiencies are observed the developer is required to correct them and if compliance is not obtained the City will issue citations and/or not allow for the project to receive final plat recordation approval. A final plat recordation is needed in order to obtain a building permit from the Building Services Department. Once the development has finished and obtained plat recordation then individual builders must obtain building permits from the City. As part of this process, City inspectors~~,~~ inspect the building site at various times to assure compliance with building standards as well as compliance with storm water regulations. Again, Stop-Work-Orders as well as citations may be issued to assure compliance. Finally, once the structure is complete the City will conduct a final inspection to make sure the site is in compliance before a Certificate of Occupancy ("CO") is issued. If the site is deficient in any building standard or storm water requirement, then the site will not be issued a CO.

To assure compliance and educate the development community, the City will offer SWPPP and BMP educational trainings for construction site operators as well as Engineers on an annual basis.

**Program to reduce discharges of pollutants into the MS4 from construction sites**
Measurable Goals ~~2019-2024~~

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Review of construction plans (OSS) | Bi-monthly | Starts immediately and reported December 2020 and then annually | Engineering ~~Building Services~~ Department |
| Issuance of construction permits. | Bi-monthly | Starts immediately and reported December 2020 and then annually | Building Services Department, Engineering Department |
| Inspections of construction sites. | Three (3) times per development as a minimum | Starts immediately and reported December 2020 and then annually | ~~Building Services Department,~~ Engineering Department |
| Issuance of building permits. | Weekly | Starts immediately and reported December 2020 and then annually | Building Services Department |
| Inspection of building permit sites. | Weekly | Starts immediately and reported December 2020 and then annually | Engineering ~~Building Services~~ Department |
| Training for Developers and Builders | Annually | Starts immediately and reported December 2020 and then annually | Building Services Department, Engineering Department, Environmental & Solid Waste Services Department |

The City has also adopted a Storm Water Management Guidance Manual that identifies suggested BMPs.

## Lists of Sites

The City of Laredo's Engineering~~Building Services~~ Department maintains a list of construction sites and their corresponding TPDES permit number. This list includes the name, location, and permit number. This list is maintained bi-monthly.

## Construction Site Inspections

As mentioned previously, the City assigns staff to review and inspect developments through the Engineering~~Building Services~~ Department from clearing and grubbing of the site to the issuance of the CO.

# MCM 7 Public Education, Outreach, Involvement, and Participation

The Public Education, Outreach, Involvement, and Participation minimum control measure consists of BMPs that focus on the development of educational and media materials designed to inform public employees, businesses, and the general public of hazards associated with the illegal discharges and improper disposal of waste and about the impact that storm water discharges can have on local waterways, as well as steps the public can take to reduce pollutants in storm water systems. Specifically, these efforts are to teach the importance of protecting storm water quality for the benefit of the environment and human health. The role of each community member at home and at work are a particular emphasis.

The City currently has a variety of programs such as the Household Hazardous Waste ("HHW") Collection program and the Love Laredo B.I.G. (Bag It Green) Campaign to help address these issues and educate the residents on how to reduce storm water pollutants. The City also collaborates with Keep Laredo Beautiful ("KLB") in coordinating and hosting numerous tree planting events and creek clean-ups throughout the year. The City also provides supplies for the City Beautification Program and the Storm water Mural Installations with K~~eep L~~~~aredo B~~~~eautiful~~. Furthermore, educational information and materials about storm water are also provided through the City at numerous special events with other departments throughout the year. The City assists in planning and hosting numerous annual events such as Senator Judith Zaffirini's Environmental Summit, the Rio Grande International Study Center's Earth Day, and the Lamar Bruni Vergara Environmental Science Center's Earth Day events.

The City of Laredo Environmental & Solid Waste Services Department will coordinate the record compilation of outreach activities by the staff including quantities of literature and promotional items distributed, records of media contacts, public speaking engagements, events, and meetings attended. Documentation shall be detailed enough to demonstrate the number of resources used to address each group. Evaluation of the success of this minimum control measure will be through careful analysis of the measurable goals for each BMP included in this minimum measure. The City of Laredo public education BMPs target all sectors of the public including residents, visitors, public service employees, businesses, commercial and industrial facilities. The City of Laredo will continue to refine the public education and outreach program and will summarize the annual activities in the Annual Report.

## Public Education and Outreach

**General Education on Storm Water**

The City will develop articles related to storm water such as the SWMP, storm water pollution prevention, reducing pet waste by the public through promoting use of pet waste bags, public events such as Earth Day and Household Hazardous Waste Event, better landscaping practices, and the effects of pet waste on storm water. The articles will be provided to residents through print publications, social media, and printed on handouts to be distributed at public events and displayed at other City of Laredo departments, or other available avenues.

**General Education on Storm Water**
Measurable Goals ~~2019-2024~~

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Develop print media to handout for the Household Hazardous Waste Events twice per year | Twice per year | Twice prior to October 15, 2020, and then twice per year | Environmental & Solid Waste Services Department |
| Print event information and distribute at City and County events | Once per year | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |
| Provide and distribute general storm water brochures at community events and at other City offices | Once per year | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |
| Provide storm water education and BMPs to children grades K – 12. Visit a minimum of ten (10) schools each year. | Ten schools per year. | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |
| Distribute storm water promotional items at events that are relevant to environmental and storm water pollution. | Goal is to distribute 5,000 items per year. | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |

**Storm Water Social Media Content**
Social media has proven to be a useful method for reaching residents. Therefore, the City will post information about storm water-related issues and events on the City's social media content as appropriate and within the City's posting guidelines.

**Storm Water Social Media Content**
Measurable Goals ~~2019-2024~~

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Continue to post new information and events as it becomes available. | Post new information and event information at least once per quarter | Starts immediately and reported December 2020 and then annually. | Environmental & Solid Waste Services Department |

| | | | |
|---|---|---|---|
| Post general stormwater educational information on the City's social media outlets. | Post at least two times per year. | Starts immediately and reported December 2020 and then annually. | Environmental & Solid Waste Services Department |

**PSA's and other MEDIA Advertisement**

Share Public Service Announcements ("PSAs") and Video advertisements in a variety of city and public media outlets. The focus will be on storm water runoff and steps the public can take to reduce storm water pollution

**PSAs and Other MEDIA Advertisement**

Measurable Goals 2019 2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Publish and promote PSAs and Video media content through City and various other businesses. Topics to promote include events and BMPsS that can contribute to improved storm water quality. | Once per year. | October 15, 2020 and then annually | Environmental & Solid Waste Services Department |

## Public Involvement and Participation

**Storm water Education at Special Events**

The City sponsors and co-sponsors special events such as the Kite Festival, Environmental Summit, and various events throughout the year where information regarding storm water will be distributed at a minimum of two events annually. The City assists Keep Laredo Beautiful in planning and hosting events and beautification projects where the City staff and KLB members set up booths or hand out information to attendees, as well as discuss storm water pollution issues during conversations at the events. Public events are great opportunities to reach residents, businesses, and visitors to the City

**Storm Water Education at Special Events**
Measurable Goals ~~2019-2024~~

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Attend public events throughout the year and distribute storm water educational materials to event attendees. Report a summary of the items purchased for the events and total estimated attendance. | At least two events per year. | October 15, 2020, and then annually | Environmental & Solid Waste Services Department, Keep Laredo Beautiful |

**Creekside Clean-Up Events**
City staff and KLB collaborate to host the Chacon Creek and other cleanup events designed to keep large items, floatables, and debris, from entering the waterways. Cleanup events are an excellent activity to create local ownership of environmental resources, educating the public and preventing pollutants from entering local waterways.

**Creekside Clean-up Events**
Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Continue to collaborate with ~~Keep Laredo Beautiful (“KLB”)~~ for the Creekside Clean-up events. Track the location of each event, the number of participants, and the weight/volume of items removed. | Once per year. | October 15, 2020, and then annually | Environmental & Solid Waste Services Department, Keep Laredo Beautiful, Parks and Recreation Department |

**Household Hazardous Waste (“HHW”) Program and Event**
The City owns and operates a Household Hazardous Waste Collection Center (“HHWCC”) located at 6912 TX-359, Laredo, TX 78043. It is open to the public on specific dates throughout the year. Residents may drop off electronic wastes and household hazardous waste such as aerosol cans, paint, fertilizers, oil, and cleaning products. In addition, the ~~c~~City hosts the bi-annual Household Hazardous Waste Events.

**Household Hazardous Waste ("HHW") Collection Program and Event**
Measurable Goals ~~2019-2024~~

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Continue to offer the service for residents to drop off HHW at the City's HHWCC. Record the weight of materials collected, the amount recycled, ~~and~~ the amount sent off for disposal, and participation of Laredo residents and other communities utilizing the facility. | Record identified information quarterly. | Report December 2020 and then annually. | Environmental & Solid Waste Services Department |
| Continue to provide the City's bi-annual HHW event for those who cannot make it to the HHWCC | Twice per year | Once by October 15, 2020, and then twice per year afterwards | Environmental & Solid Waste Services Department |

**Neighborhood Beautification Program**
The City will provide most supplies and labor for various small neighborhood-wide cleanups and tree planting events. The City ~~does~~ takes part in assisting to organize the cleanup. The program is very successful and the City has had thousands of volunteers in the community cleanup events.

**Neighborhood Beautification Program**
Measurable Goals ~~2019-2024~~

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Continue to provide supplies, materials, and labor for neighborhood cleanup and tree planting events. Track the location of each event, the number of participants, and the weight/volume of items removed. | At least one event per year. | October 15, 2020, and then annually | Environmental & Solid Waste Services Department |

**Love Laredo B.I.G. Pledge and Program**

The City and the non-profit group, Rio Grande International Study Center ("RGISC"), collaborate on the ~~'~~Love Laredo B.I.G. (Bag It Green) Campaign. This campaign promotes the use of reusable

bags and educates the public about the environmental and storm water pollution hazards single-use plastic bags cause. The campaign asks community members and businesses to pledge to stop offering plastic bags and reduce single-use plastic.

**Love Laredo B.I.G. (Bag It Green) Pledge and Program**
Measurable Goals ~~2019-2024~~

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| City will continue to develop print media on reusable bags and other "Bag It Green" items to promote the campaign and educate the public on best practices in removing single-use plastic. | Goal is to distribute reusable bags at every city and county event throughout the year. Attend a minimum of 10 city/county events throughout the year.<br><br>Goal is to distribute 1000 other "Bag It Green' items each year as prizes. (*i.e.*, Reusable Utensils and straws). | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department, Keep Laredo Beautiful, |
| Share information on the City website and social media to promote taking the Pledge to Love Laredo B.I.G. | Once per year on City website and twice per year on social media | Reported December 2020 and then annually | Environmental & Solid Waste Services Department, Keep Laredo Beautiful, |

## MCM 8 Monitoring, Evaluating, and Reporting

### Dry Weather Screening Program

The dry weather field screening program consists of developing a map of the Storm Sewer System for the City of Laredo, locating all storm water outfalls, including major outfalls, and choosing representative field screening points which will attempt to cover 100% screening. The task of sampling all the storm water outfalls will be divided into five (5) annual screening projects of 20% per year. A study on dry weather flow will be performed by collecting samples for laboratory analysis and drawing conclusions on the basis of field and laboratory results. Based on each year's laboratory test results, the environmental technicians will gradually add the task of resampling those outfalls suspected of having illicit discharges to the 20% storm water outfall screening project for that particular year. A residential major outfall consists of a 36-inch pipe or larger into which one or more drainage areas connect through an elaborate pipe system. These major outfalls discharge their total drainage storm water volume into a major creek or channel leading to the Rio Grande, or they discharge directly into the Rio Grande. Differentiating from the previously mentioned non-industrial major outfalls, only by the pipe diameter, a major outfall for an industrial zoned area is considered to be a 12-inch storm drain pipe or larger which directly drains into a major creek, major channel, or directly into the Rio Grande.

A team of technicians will be assigned the task of selecting the outfalls to be tested, taking grab samples from the outfalls, transporting the samples to our headquarters, and performing the corresponding storm water outfall screening tests. Selection of the outfalls to be sampled will be based on the existing numeric identification system of the outfalls. A CHEMetrics™ analysis kit equipped with specific ampoules will be utilized for the analysis of ammonia, total chlorine, total copper, detergents, and total phenols. Also, an Orion M1230 microprocessor based multiprobe meter will be utilized to measure pH, conductivity, temperature, dissolved oxygen (DO), and salinity. Finally, a Quanti-Tray / 2000 with Colisure Test will be utilized to estimate *E. coli* numbers. The designated technicians will follow all necessary QA/QC measures. The dry weather screening schedule is devised to increase productivity by having technicians attend outfall locations in close proximity to one another on a regular basis. The program will be conducted in specific months of every year. All samples will be collected after at least a 72-hour period of dryness between storm events.

**Program Schedule:**

Dry weather screening of all known storm water outfalls will be completed in a five-year period by sampling 20% of the total number of outfalls for each of the five (5) years that cover the permit's period. In addition to the annual 20% outfall screening, samples will be collected from those outfalls that are suspected of having illicit discharges for the remaining permit term.

**Dry Weather Screening Program**
Measurable Goals ~~2019 2024~~

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Dry weather screening | 20% of the MS4 per year | 20% each year to be reported in December 2020 and then annually | Environmental & Solid Waste Services Department |

## Wet Weather Screening Program

The Wet Weather Screening Program is implemented in addition to the representative wet weather monitoring program. It serves a similar purpose in that, for the life of the permit, its intention is to screen for pollutants within the City's four (4) major watersheds during storm events. Screening will be conducted twice a year for each of the watersheds.

Four (4) grab sample locations, one (1) per watershed, will be chosen based on accessibility and safety of the location; thus, alternate locations may be chosen which will remain representative of the discharging watershed. The four (4) watersheds to be tested are Chacon, Zacate, Upper Zacate, and Manadas w~~W~~atersheds.

Environmental & Solid Waste Services Department personnel conduct the field collection, perform the collected sample testing, record the findings obtained, and perform an analysis of the results for the two (2) yearly rain events. This analysis serves to better evaluate the need for continuing current water shed protection BMPs and also consider the need for additional projects.

The City staff will perform analysis of the collected samples by using a CHEMetrics™ analysis kit equipped with specific ampoules for the analysis of ammonia, copper, total chlorine, phenols and

detergents. Additionally, an Orion M1230 microprocessor based multiprobe meter will be utilized to measure pH, conductivity, temperature, ~~dissolved oxygen (~~DO~~)~~, and salinity. Finally, a Quanti-Tray / 2000 with Colisure Test will be utilized to estimate *E. coli* numbers. The designated technicians will follow all QA/QC measures necessary.

**Wet Weather Screening Program**
Measurable Goals ~~2019-2024~~

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Wet weather screening in four (4) watersheds | Bi-annually (twice per year) | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |

## Industrial and High Risk Runoff Monitoring Program

## Storm Event Discharge Monitoring

The representative wet weather monitoring program was developed by the City of Laredo to characterize the quality of storm water discharges from the MS4. Five (5) representative monitoring outfall locations have been established, based on land-use, and are described below:

Outfall 001 – Station located at 601 West Canal Street approximately 300 yards east of I-35 on West Canal between Pep Boys and Stein Mart
Outfall 002 – Station located at 102 West Guerrero Street on Zacate Creek
Outfall 003 – Station located at the intersection of Bustamante Street and Meadow Street
Outfall 004 – Station located at 602 Enterprise Street
Outfall 005 – Station located at 517 Jefferson Street at San Eduardo Street

These outfall are sampled at least once per season for representative storm events, which is greater than 0.1 inches in magnitude and occurs at least 72 hours from the previously measurable storm event. Analysis and collection of samples are in accordance with the methods specified in 40 C.F.R. Part 136. The parameters analyzed from each sample are as follows - in milligrams per liter (mg/L) except as indicated:

Biochemical Oxygen Demand, 5-day
Chemical Oxygen Demand (COD)
Oil and Grease
Total Suspended Solids (TSS)
Total Dissolved Solids (TDS)
Total Nitrogen
Total Kjeldahl Nitrogen (TKN) (i.e., ammonia nitrogen plus nitrate-nitrogen)
Total Antimony
Total Arsenic
Total Phosphorus
Dissolved Phosphorus
Total Cadmium (µg/L)
Total Chromium (µg/L)
Total Copper (µg/L)

Total Lead (µg/L)
Total Mercury (µg/L)
Total Nickel (µg/L)
Total Silver (µg/L)
Total Selenium (µg/L)
Total Thallium (µg/L)
Total Zinc (µg/L)
Chlordane (µg/L)
4, 4' - DDE (µg/L)
Total Polychlorinated biphenyls (PCBs) (µg/L)
Methylene Chloride (µg/L)
Toluene (µg/L)
E.coli (MPN/100 mL)
pH (report daily minimum and daily maximum results in standard units, "S.U.")
Hardness (as CaCO3)
Temperature (°C)
Atrazine (µg/L)

**Storm Event Discharge Monitoring**
Measurable Goals ~~2019-2024~~

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Sampling of storm water | Once per season defined in permit | October 15, 2020, and then annually | Environmental & Solid Waste Services Department |

## Floatables Monitoring

As mentioned previously the City of Laredo will weigh and document all floatables removed from the MS4 through creek cleaning activities, vacuum truck MS4 cleaning, and floatable controls that will be properly disposed of at the landfill.

**Floatables Monitoring**
Measurable Goals ~~2019-2024~~

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Weighing and documenting floatables removed from MS4 | Weekly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |

## Impaired Water Bodies and TMDL requirements

The City of Laredo ~~does~~ discharges directly into a water quality-impaired water that does not have an approved TMDL (Rio Grande), thus:

(1) By October 15, 2020, the City must determine whether the MS4 may be a source of the pollutant(s) of concern. The pollutant of concern is bacteria.

(2) The City has determined that the MS4 may discharge bacteria to an impaired water body without a TMDL. Therefore, the City has included in this SWMP focused BMPs, along with corresponding measurable goals that the permittee will implement to reduce the discharge of bacteria.

It must be noted ~~in this section~~ that the major contributor of bacteria to the Rio Grande is Laredo's Sister City in Mexico, Nuevo Laredo. Nuevo Laredo has reduced its bacterial pollutant load to the Rio Grande significantly through a waste water treatment plant funded through NAD Bank~~;~~, however, Nuevo Laredo continues to contribute approximately 7 million gallons of raw sewage to the Rio Grande daily due to aging and substandard infrastructure. Moreover, there is no legal equivalent MS4 permit program that exists in Mexico.

The City will address this issue through these additional BMPs:

**Sanitary Sewer Systems**
The Utilities Department has implemented an Asset Management Program (“AMP”) to identify needed improvements to sanitary sewers to reduce overflows and utilizes “Mission Control” software to monitor and address lift station issues and inadequacies. Moreover, the Utilities Department has strengthened sanitary sewer use requirements to reduce blockage from fats, oils, and grease (“FOG”) with the implementation of an Industrial and High Strength Waste program that applies to all Food Services Establishments (“FSEs”), Food Processing Establishments (“FPEs”), and other commercial accounts. This program establishes a monitoring and surcharge program that assesses an additional surcharge that offsets added costs and operation loads the City encounters from treating Industrial and Commercial waste when the sewage concentrations are above the normal domestic Biochemical Oxygen Demand (BOD) and Total Suspended Solids (TSS) design concentrations of 250 mg/L.

**Animal Sources**
Additionally, the City is expanding management programs to address pet waste by installing pet waste bag dispensers int~~o~~ all City parks.

**Residential Education**
Finally, to reduce bacteria runoff the City has implemented public education programs to address proper pet waste disposal and FOG education to reduce clogging of sanitary sewer lines to reduce overflows.

**Monitoring and Assessment**
The City will continue to monitor and assess and document these programs and report the results in our annual report.

**Impaired Water Bodies and TMDL requirements**
Measurable Goals ~~2019-2024~~

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Utilization of AMP to identify needed improvements sanitary sewer lines. | Weekly | Starts immediately and reported December 2020 and then annually. | Utilities Department |

| | | | |
|---|---|---|---|
| Utilization of "Mission Control" software to monitor lift stations. | Weekly | Starts immediately and reported December 2020 and then annually | Utilities Department |
| Implementation and monitoring of Industrial and High Strength Waste program on FOG | Monthly | Starts immediately and reported December 2020 and then annually | Utilities Department |
| Installation of pet waste bag dispensers in all City parks. | Quarterly | Starts immediately and reported December 2020 and then annually | Parks Department |
| Residential FOG public education | Monthly | Starts immediately and reported December 2020 and then annually | Utilities Department |
| Monitoring of programs | Annually | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |

# ATTACHMENT 9.B.

**Application for Renewal**

**for the City of Laredo**

**and Laredo College**

**TPDES Phase I MS4 Permit**

**TPDES Permit No. WQ0004592000**

**City of Laredo, Webb County, Texas**

**RN103014353**

**April 17, 2024**

This page replaces Tab 9.B. from hard copy.

# STORM WATER MANAGEMENT PLAN

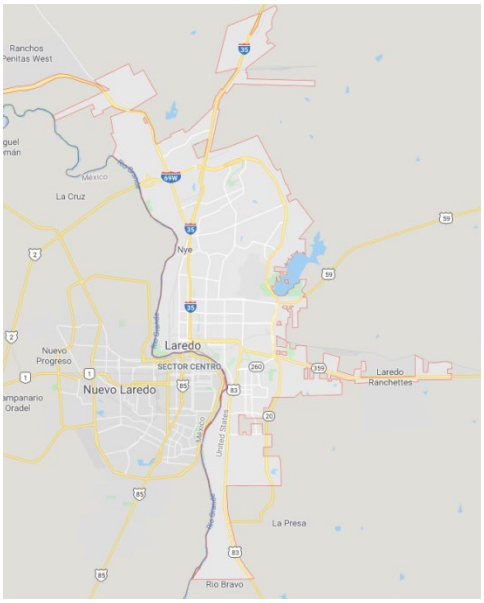

City of Laredo, Texas

Phase I MS4 (WQ0004592000)

PROPOSED REVISIONS

www.esd.cityoflaredo.com
City of Laredo
Environmental & Solid Waste Services Department
619 Reynolds Street, Laredo, Texas 78040

# CITY OF LAREDO
# WQ0004592000




## MUNICIPAL SEPARATE STORM SEWER SYSTEM (***MS4)***
## STORM WATER MANAGEMENT PROGRAM (***SWMP)***

In compliance with
The Texas Commission on Environmental Quality
Permit to Discharge
Under the Texas Pollutant Discharge Elimination System
Permit No. WQ0004592000, issued October 15, 2019
Permit term 5 years

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## Table of Contents

In 1972, Congress amended the Federal Water Pollution Control Act (commonly referred to as the Clean Water Act "CWA" to prohibit the discharge of any pollutant to waters of the United States from a point source unless the discharge is authorized by a National Pollutant Discharge Elimination System ("NPDES") permit. The NPDES program is designed to track point sources and requires the implementation of controls necessary to minimize the discharge of pollutants.

In 1987, Congress amended the CWA to require implementation, in two phases, of a comprehensive national program for addressing storm water discharges. The first phase of the program, commonly referred to as "Phase I," was promulgated by the U.S. Environmental Protection Agency ("EPA") on November 16, 1990 (Federal Register, Volume 55, Page 47,990 [55 FR 47990]). Phase I requires NPDES permits for storm water discharges from a large number of priority sources, including municipal separate storm sewer systems ("MS4s") generally serving populations of 100,000 or more and several categories of industrial activity, including construction sites that disturb five or more acres of land.

EPA promulgated the second phase of the storm water regulatory program, commonly referred to as "Phase II," on December 8, 1999 (64 FR 68722). Phase II regulations address storm water discharges from certain MS4s serving populations of less than 100,000 people and included construction sites that disturb one or more acres of land.

As a Phase I city, the City of Laredo is required to implement and enforce a Storm Water Management Program ("SWMP") designed to reduce the discharge of pollutants from the MS4 to the maximum extent practicable, to protect water quality.

EPA has delegated authority to issue MS4 storm water discharge permits to the State of Texas. Under the authority of the Texas Water Code and the CWA, the Texas Commission on Environmental Quality ("TCEQ") is the regulatory body responsible for issuing permits regulating discharges from Phase I and II MS4s to surface waters in the state.

On October 15, 2019 the TCEQ issued the third storm water permit to the City of Laredo (WQ0004592000). This permit requires that the City of Laredo comply with a number of administrative and legal requirements and to update, implement, and enforce a SWMP designed to reduce the discharge of pollutants from the MS4 to the maximum extent practicable to protect water quality.

The MS4 permit is issued to both the City of Laredo and Laredo Community College, now Laredo College (“LC”). The City of Laredo and LC entered into an Interlocal Agreement whereby the City of Laredo implements a SWMP for LC.

**2019 to 2024 Best Management Practices**

Best Management Practices (BMPs) can include schedules of activities, prohibition of practices, maintenance procedures, structural controls, local ordinances, and other management practices to prevent or reduce the discharge of pollutants. BMPs also include treatment requirements, operating procedures and practices to control runoff, spills, or leaks, waste disposal, or drainage from raw material storage areas.

**Minimum Control Measures** Established in the MS4 Permit

**Best Management Practices** Selected by the MS4 Operator (City of Laredo)

**Responsible Authority (City Department)** Identified to do the following:

- ☐ Implement BMPs;
- ☐ Evaluate BMP effectiveness annually; and
- ☐ Document activity for annual reports.

**Measurable Goals** are milestones used by the MS4 operator (City of Laredo) and TCEQ to track progress and effectiveness of BMPs in reducing pollutants to the Maximum Extent Practicable (MEP). Measurable Goals include:

- A quantifiable target or other specified frequency to measure progress
- A schedule or date of completion

| Minimum Control Measures (MCMs) | |
|---|---|
| **MCM 1** | **MS4 Maintenance Activities** |
| **MCM 2** | **Post- Construction Stormwater Control Measures** |
| **MCM 3** | **Illicit Discharge Dectection and Elimination** |
| **MCM 4** | **Pollution Prevention and Good Housekeeping for Municipal Operations** |
| **MCM 5** | **Industrial and High Risk Runoff** |
| **MCM 6** | **Construction Site Stormwater Runoff** |
| **MCM 7** | **Public Education, Outreach, Involvement and Participation** |
| **MCM 8** | **Monitoring, Evaluating, and Reporting** |

| Minimum Control Measures & Best Management Practices | Responsible Department |
|---|---|
| **MCM 1 MS4 Maintenance Activities** | |
| Structural Controls | Environmental & Solid Waste Services Department, Engineering Department |
| Floatables | Environmental & Solid Waste Services Department |
| Roadways | Public Works Department |
| **MCM 2 Post-Construction Stormwater Control Measures** | |
| Implementation and Enforcement of Controls to minimize discharge of pollutants from areas of new development and significant redevelopment | Environmental & Solid Waste Services Department, Engineering Department |
| Implementation of a comprehensive master planning process for new development and redevelopment projects that disturb one acre or more of land | Environmental & Solid Waste Services Department, Engineering Department |
| Evaluation of the existing SWMP as necessary to ensure that this MCM incudes a regulatory mechanism, such as an ordinance, to implement and enforce the new requirements of this program and shall ensure that the SWMP includes strategies for structural and nonstructural controls (i.e., BMPs) appropriate for the community. | Environmental & Solid Waste Services Department, Engineering Department |
| Assessment of the impacts on receiving water(s) for all flood control projects. | Environmental & Solid Waste Services Department, Engineering Department |
| **MCM 3 Illicit Discharge Detection and Elimination** | |
| Prohibition of illicit non-stormwater discharges from entering the MS4. | Environmental & Solid Waste Services Department |
| Miscellaneous, non-stormwater discharges that are authorized. | Environmental & Solid Waste Services Department |
| Elimination of Illicit Discharges and Improper Disposal. | Environmental & Solid Waste Services Department |
| Overflows and Infiltration. | Environmental & Solid Waste Services Department, Utilities Department |
| Household Hazardous Waste and Used Motor Vehicle Fluids. | Environmental & Solid Waste Services Department |
| MS4 Screening and Illicit Discharge Inspections | Environmental & Solid Waste Services Department |
| Priority Areas. | Environmental & Solid Waste Services Department |
| NPDES and TPDES Permittee List. | Environmental & Solid Waste Services Department, Engineering Department, |
| MS4 Mapping | Engineering Department |
| Spill Prevention and Response | Environmental & Solid Services Department, Public Works Department, Fire Department |
| **MCM 4 Pollution Prevention and Good Housekeeping Program** | |
| Pollution Prevention and Good Housekeeping | Various City Departments |
| Waste Handling | Various City Departments |
| Pesticide, Herbicide, and Fertilizer Application | Environmental & Solid Waste Services Department, Parks and Recreation Department |
| List of Municipal Facilities | Environmental & Solid Waste Services Department |
| **MCM 5 Industrial and High Risk Runoff** | |
| Programs to identify and control pollutants in stormwater discharges | Environmental & Solid Waste Services Department |
| **MCM 6 Construction Site Stormwater Runoff** | |
| Program to reduce discharges of pollutants into the MS4 from construction sites. | Environmental & Solid Waste Services Department, Engineering Department |
| Lists of Sites | Engineering Department |
| Construction Site Inspections | Engineering Department |
| **MCM 7 Public Education, Outreach, Involvement, and Participation** | |
| Public Education and Outreach | Environmental & Solid Waste Services Department |
| Public Involvement and Participation | Environmental & Solid Waste Services Department |
| **MCM 8 Monitoring, Evaluating, and Reporting** | |
| Dry Weather Screening Program | Environmental & Solid Waste Services Department |
| Wet Weather Screening Program | Environmental & Solid Waste Services Department |
| Industrial and High Risk Runoff Monitoring Program | Environmental & Solid Waste Services Department |
| Storm Event Discharge Monitoring | Environmental & Solid Waste Services Department |
| Floatables Monitoring | Environmental & Solid Waste Services Department |
| Impaired Water Bodies and TMDL requirements | Environmental & Solid Waste Services Department |

# MCM 1 MS4 Maintenance Activities

## Structural Controls

Where a subdivision is traversed by a water course, drainage easement, channel, or stream, specifications and designs for storm drainage improvements shall be provided to the City, according to the document titled "Specifications and Design Standards for Storm Drainage Improvements," adopted by the City Council of the City of Laredo as an official subdivision regulation.

The purposes of the storm drainage standards are: 1) to establish policies governing storm drainage facilities within the City Limits of the City of Laredo and its extraterritorial jurisdiction; and 2) to protect the general health, safety, and welfare of the public by reducing flooding potentialities, controlling excessive runoff, minimizing erosion, providing for maintenance, addressing siltation problems, and eliminating damage to public facilities resulting from uncontrolled storm water runoff.

As a general requirement for any property involved in the platting process, the owner/developer is to provide, at his expense, a preliminary drainage study of the area proposed for development. The City Engineer or his authorized designee may specifically exempt in writing plats that have previously approved drainage studies, or amended plats. The study shall include the following:

- Existing topography shown by contour lines.
- Existing and proposed drainage facilities both on-site and on adjacent affected properties.
- The scale shall not be smaller than one inch (1") = two hundred feet (200').
- Sufficient design calculations showing preliminary sizes of drainage facilities and easement sizes and locations.

Requirements for completed final plans are as follows:

- The developer and his engineer shall be responsible for the accuracy of the information furnished in the design of the storm drainage facilities, pertaining to both the development site in question (on-site) and affected (off-site) properties.
- All drainage easements, both within the subdivision and off-site, shall be dedicated to the City of Laredo if constructed in conformance with city standards. If not designed to city standards, the developer has the option to construct and maintain.
- A general location map of the subdivision showing the entire watershed shall be provided.
- Calculations showing the anticipated storm water flow computed on the basis of ultimate development of the entire watershed area, percent runoff, and time of the concentrations shall be provided.
- Calculations shall be submitted based on 10-year and 25-year frequency design.
- When a drainage channel or storm sewer is proposed, calculations on design and complete plans and specifications shall be submitted showing complete construction details.
- When conditions downstream from a proposed channel or storm sewer cannot handle maximum design flow, high water surface elevations based on a 25-year frequency shall be indicated based on existing conditions.
- Compliance with Federal Emergency Management Agency ("FEMA") regulations is mandatory.
- Compliance with the Green Space Ordinance.

Drainage facilities covered by the ordinance are streets, conventional systems (*e.g.*, enclosed underground structures), reinforced concrete-lined open channels, combination earthen/concrete channels, and natural creeks/streams.

The storm drainage improvements and maintenance requirements for subdivisions were passed and approved by the City Council on June 28, 1999, and the ordinance was amended in 2012 to comply with the "one (1) acre or more" requirement.

The City Engineer and his staff are involved with reviewing, approving, and inspecting new public improvement projects and subdivision developments to ensure that the projects are constructed according to plans and specifications and that construction is in accordance with adopted city standards.

The subdivision ordinance document, "Specifications and Design Standards for Storm Drainage Improvements and Maintenance," has reduced the risk of flooding during large magnitude storm events in new subdivisions around the City.

**Structural Controls**
Measurable Goals

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Review of Drainage Plans for Subdivisions | Bi-monthly (twice per month) review | Reviews start immediately and are reported December 2020 and then annually | Environmental & Solid Waste Services Department, Engineering Department |

## Floatables

In an effort to decrease the amount of pollutants flowing into the Rio Grande, the City has implemented an inlet/manhole/outfall/storm water sewer lines cleaning program. The storm water main and lateral line conditions are first inspected by utilizing a CCTV Audio/Video recording Pole Camera, and for larger area distances, a specialized van loaded with a CCTV Electro/Mechanically controlled robot and a computerized recording system. The program will decrease pollutants that may reach and contaminate the City's watershed, will make current problem area locations easier to detect, will help control foul odors and make the area more aesthetically pleasing, will help minimize the potential for street flooding caused by volume capacity reduction obstructions, and will help make sites safer for dry-weather screening.

The program will be designed in a systematic fashion so that all locations will receive attention in an expedient manner. The crew will thoroughly clean the main and lateral storm sewer lines, inlets, manholes, and outfalls in the specified areas on a daily basis. All the information pertaining to the inlets, manholes, and outfalls will be recorded and reported as the actual number of them that are actually maintained. On the other hand, the amount of main and lateral storm water sewer lines CCTV inspected, flushed, and vacuumed, will be recorded and reported in linear feet.

The Environmental & Solid Waste Services Department will be responsible for the cleaning of all inlets, manholes, and outfalls and sewer lines on a scheduled basis. Thus a major duty of this

crew is to clean the inlets, manholes, and outfalls. The goal of this program is to clean all the inlets, manholes, and outfalls at least once a year. It is anticipated that an average of 20 to 30 manholes, inlets, and outfalls can be cleaned on a single working day.

The proposed goal for the minimum amount of storm sewer lines cleaned will be 20,000 linear feet per month. The proposed goal for the minimum amount of storm sewer lines CCTV inspected will be 2,000 linear feet per month. The mud and trash collected from the sewer system will be properly collected, transported, and disposed at the local city landfill. This mud/trash collected will be weighted, recorded and reported in pounds and/or tonnage collected.

The criteria used to establish priorities for inspection and cleaning include: amount of trash accumulation in specific land use areas, which have heavy traffic and are highly visible commercial/business/industrial areas; new development storm water infrastructure warranty expiration deadline in which ownership and maintenance responsibility is transferred to the city after a two year period from the end of development completion; and an existing older subdivision inspection/cleaning rotation program.

Additionally, along with the City picking up trash twice per day in the downtown area, the City has implemented a Commercial Litter Prevention Ordinance that deals with litter generated at commercial shopping centers. The City will conduct inspections of commercial centers multiple times a year to assure compliance.

Finally, the City has installed structural controls at Bustamante and one at Guerrero. These structural controls will be cleaned monthly.

Also, in an effort to address floatables, the City enforces its Commercial Litter Ordinance to address litter from commercial shopping centers. The City conducts inspections throughout the year.

**Floatables**
Measurable Goal

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Cleaning of MS4 by Vacuum Truck (20,000 LF per month) | Weekly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |
| Commercial Litter Ordinance Inspections | Bi-yearly (twice per year) | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |
| CCTV Inspection of MS4 (2,000 LF per month) | Weekly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |
| Cleaning of Structural Controls (Guerrero & Bustamante) | Monthly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |

## Roadways

In order to improve driving conditions and reduce pollutants entering the MS4 from un-maintained streets, a street maintenance program was developed. This program is intended to keep the state of the local streets in superior condition.

This program has been in effect for the repair and maintenance of city streets for transportation purposes for many years. However, the program is now also utilized to decrease pollutants entering the MS4 and the associated storm water. This program utilizes twelve (12) street sweepers that maintain the City streets, concentrating on the major through fares within the City. Major streets are cleaned at least once per week, with problem areas such as downtown cleaned on a daily basis.

This program also involves pothole repair, which utilizes seven (7) pothole-patching trucks that respond to citizen complaints as well as patrol the City for problem areas.

Any city employee involved in street asphalt breaking in order to repair underground infrastructure has been and will continue to be trained to apply BMPs during such activities, such as covering and containing piles of dirt and/or trash in order to prevent or minimize the possibility of storm water runoff traveling down the street curves and running into storm inlets, creeks, channels, and/or any other MS4 structure. After finishing, covering the hole, and replacing the asphalt/concrete, the area will be cleaned up and any leftover dirt and/or trash will be removed and disposed appropriately.

**Roadways**
Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Street Sweeping | Weekly | Starts immediately and reported December 2020 and then annually | Public Works Department |

# MCM 2 Post-Construction Storm Water Control Measures

## Implementation and Enforcement of Controls to minimize discharge of pollutants from areas of new development and significant redevelopment

In June 1999, the City of Laredo adopted its storm water ordinance (Ordinance No. 99-O-186) which was amended in 2012 to include one (1) acre or more sites to protect, maintain, and enhance the public health, safety, and general welfare by establishing minimum requirements and procedures to control the adverse impacts associated with storm water runoff. Proper management of storm water runoff will minimize damage to public and private property, reduce the effects of development on land and stream channel erosion, assist in the attainment and maintenance of water quality standards, reduce local flooding, and maintain after development,

as nearly as possible, the pre-development runoff characteristics. The City's storm water ordinance and the related guidance document address BMPs that will be used in areas of new development and significant redevelopment. The ordinance requires the developer to sign a standard maintenance and monitoring agreement ("MMA") for any storm water facilities and BMPs constructed as part of the development process.

The Storm Water Management Ordinance requires that a storm water management permit be obtained from the City for all land disturbances of one (1) or more acres. The permit requires Storm Water Pollution Prevention Plans ("SWPPPs") for proposed major construction, minor construction, street/road construction, and trenching and filling projects. Inspections of construction sites for compliance are also covered by the ordinance.

Additionally, each permit requires the following:

- Completion of the City's standard Storm Water Pollution Prevention ("SWPP") permit application form which includes a Storm Water Pollution Prevention Plan ("SWPPP").
- Site, vicinity, contour, and drainage map.
- Erosion control plans, methods and practices, as part of the SWPPP.
- Work schedule.
- Application process fee.
- A copy of the TPDES storm water discharge Notice of Intent ("NOI") application and the approved permit, if the site is one (1) acre or more.
- Estimates, in dollar amount, to develop and implement this permit requirement.

All engineering consultants, and/or developers involved in the planning and/or clearing of (one) 1 or more acres of land for the purpose of constructing residential, commercial, or industrial developments are required to prepare and distribute to all contractors and subcontractors involved a copy of the SWPPP, which is specific for the proper storage and handling of construction hazardous materials, the proper construction or placement of project site operational and practical erosion and run-off prevention controls, and the proper implementation of any other required SWPPP BMPs at the project area. The SWPPP should also describe the need for the developer to obtain storm water discharge permit coverage from TCEQ through the submission of an NOI. In addition, the SWPPP should include the name of the General Project Manager, his/her responsibilities, and the construction site self-inspection check list or evaluation, which the project manager should conduct in order to make sure the construction site meets all local and state storm water regulations and stays in compliance.

During construction, City Inspectors visit the construction sites routinely to inspect for compliance with the SWPPP and to inspect BMPs for effectiveness. Inspectors may issue citations for non-compliance to ensure the reduction of sediments from erosion entering the MS4.

Upon final inspection of construction sites, residential sites must provide a two (2) year warranty where the Developer is responsible for the maintenance of structural control BMPs. After those two years the City is responsible for maintaining the BMPs through the Public Works Creek Cleaning Division. On commercial sites, the City requires a Maintenance and Monitoring Agreement ("MMA") for the long-term maintenance of BMPs.

Environmental & Solid Waste Services Department inspectors visit all public and private Structural Controls/BMPs at least once per year to assure compliance with maintenance schedules. Moreover, the City will assess receiving water bodies for the effectiveness of these controls and

take corrective actions through improvements (for public facilities) or require private facilities to take corrective actions through the enforcement of the MMA.

**Post-Construction Storm Water Control Measures**
Measurable Goals

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Review of Master Plans, Development Plans, and SWPPPs | Bi-Monthly (twice per month) | Starts immediately and reported December 2020 and then annually | Engineering Department, Environmental & Solid Waste Services Department |
| Inspections of Construction Sites | Weekly | Starts immediately and reported December 2020 and then annually | Engineering Department |
| Inspection of Flood Control Structures | Once per year | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department, Engineering Department |
| Assessment of Impacts on Receiving Waters | Once per year | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department, Engineering Department |
| Cleaning and Maintenance of Structural Controls | Monthly | Starts immediately and reported December 2020 and then annually | Public Works Department, Environmental & Solid Waste Services Department |

## MCM 3 Illicit Discharge Detection and Elimination

### Prohibition of illicit non-storm water discharges from entering the MS4

The City has two main ordinances that prohibit illicit non-storm water discharges from entering the MS4: the Water Pollution Prevention Ordinance and the Illegal Dumping Ordinance. The Environmental & Solid Waste Services Department has four (4) full time staff to investigate and enforce cases involving illicit non-storm water discharges. These staff members are responsible for routine inspections of industrial storm water permits and mechanic shop inspections, as well as hazardous materials permit inspections. Moreover, these staff members respond to and investigate 311 calls from the public regarding cases of illicit discharges and illegal dumping. The enforcement staff works closely with Environmental & Solid Waste Services staff who conduct dry-weather and wet-weather screening as well as with staff that utilize CCTV to inspect the MS4 for illicit discharges from illegal connections.

**Prohibition of illicit non-storm water discharges**
Measurable Goals

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Citizen Complaints via 311 | Weekly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |
| Dry weather screening | 20% of the MS4 per year | 20% each year to be reported in December 2020 and then annually | Environmental & Solid Waste Services Department |
| Wet weather screening in four (4) watersheds | Bi-annually (twice per year) | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |
| Inspections of Hazardous Material Permittees | Inspection of permittees quarterly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |
| High Risk Industrial Storm Water Inspections | Three (3) times per year | Will be inspected once prior to October 15, 2020, and then annually | Environmental & Solid Waste Services Department |

## Miscellaneous, non-storm water discharges that are authorized

The City has an online non-storm water discharge permit process where the following allowable discharges can be reported so that staff can review and follow up:

A) water line flushing;
B) landscape irrigation;
C) diverted stream flows;
D) rising ground waters;
E) uncontaminated ground water infiltration;
F) uncontaminated pumped ground water;
G) discharges from potable water sources;
H) foundation drains;
I) air conditioning condensation;
J) irrigation water;
K) springs;
L) water from crawl space pumps;
M) footing drains;
N) lawn watering;
0) street wash water;
P) individual residential vehicle washing;
Q) wash waters using only potable water, and which are similar in quality and character to street wash water or individual residential vehicle washing but without the use of detergents or surfactants;
R) flows from riparian habitats and wetlands;

S) dechlorinated swimming pool discharges;
T) other allowable non-storm water discharges listed in 40 CFR § 122.26(d)(2)(iv*)(B)(1);*
U) other allowable non-storm water discharges listed in the TPDES Construction General Permit No. TXR150000 and TPDES Multi Sector General Permit No. TXR050000; and
V) other similar occasional incidental non-storm water discharges

If discharges from fire-fighting activities are identified as significant sources of pollutants the City of Laredo will notify TCEQ within 24 hours. Moreover, if an individual non-storm water discharge otherwise exempted under this section is found to be contributing significant amounts of pollutants to the MS4 the City will take enforcement actions under the City's Water Pollution Prevention Ordinance.

## Overflows and Infiltration

Wastewater overflow in collection systems occurs predominantly due to obstructions in lines that limit the carrying capacity of the line. Some overflows are also the direct result of excessive flows due to demand and usage of an inadequate pipe size or due to the fact that rain infiltrates through cracks and faulty gaskets creating a demand, which supersedes the capacity of the line. In areas where septic tanks are prevalent, they usually overflow during prolonged periods of persistent rain. Finally, a corroded or cracked pipe can leak to the surrounding areas during periods of high flow. Overflowing wastewater generally ends up in the storm water system where it stays until a significant rain event flushes the pipes.

The City has experienced overflows due to obstructions, which overwhelm the system's capacity. The overflows have primarily occurred as a consequence of grease, paper, rags, wipes and other incidental objects that fall in or are maliciously introduced into the lines. Also, roots in the lines are occasionally the cause of sewage backups or manhole overflows. The older sections of town, including the downtown area, are suspected to have a number of illegal connections to the storm sewers, since they are usually found to have a strong sewer odor within a given area.

The City has responded to these problems by undertaking an ambitious lift station overhaul program, acquiring an additional vacuum truck for maintenance tasks, developing an inspection and enforcement program for restaurants, schools, and other grease generators, and by selecting stricter standards for construction materials in the collection system. Presently, a sewage overflow is immediately vacuumed and removed or disinfected with granular chlorine on its route to the storm sewer.

In order to minimize the number of wastewater overflows, the City provides the following:

- Grease Control – Continued inspections of food preparation establishments for proper grease trap capacity and maintenance.
- Line Obstructions – A vacuum truck will be assigned exclusively to preventative maintenance of lines in the areas where historic data shows recurring problems.
- Line Maintenance Information Management – The existing computerized database will be refined to incorporate tasks that will allow the department to issue work orders upon certain frequency of events.
- The Utilities Department conducts a citywide educational campaign, utilizing all conventional types of media (TV, Radio, Bill Boards, Utilities Billing Mail, etc.), issuing educational pamphlets at local schools, and utilizing any electronic social media available to the City, in order to inform the public in general about the proper disposal alternatives

for waste cooking grease, used wipes, and other items usually thrown in the sinks and toilets. The Utilities Department will also be giving out special grease disposal bags to the public.

In the event of a wastewater overflow, the Utilities Department Wastewater Collection Division will dispatch a vacuum truck to collect as much of the spill as possible, then a crew equipped with granular chlorine will apply it to the storm water inlet in an amount proportional to the perceived spill. Laboratory data will be generated to determine an appropriate ratio of chlorine to sewage. The chlorine applied is used to minimize coliform count and reach acceptable levels for discharge while not exceeding the chlorine amount that can be placed in the receiving stream. Simultaneously, the Environmental & Solid Waste Services Department field investigators will be notified via a 24-hour hot line for an immediate assessment of the volume and type of discharge being discharged into the storm sewer. The investigators then will determine whether additional remediation actions are necessary.

The City's Utilities Department utilizes several crews to operate vacuum trucks and these are available on a 24 hour/7 day schedule. The Utilities Department also has crews that conduct CCTV inspections as well as smoke and/or dye tests on wastewater lines to identify leaks or illegal connections in the system.

In identifying infiltration to the MS4, the Environmental & Solid Waste Services Department utilizes a CCTV inspection system to inspect our MS4 for infiltration from sanitary sewer lines as well as illicit connections. This is done on existing lines and on areas of new development to ensure that there are no defects in areas of new development before the City accepts a new subdivision.

**Overflows and Infiltration**
Measurable Goals

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| CCTV Inspection of MS4 | Weekly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |
| Cleaning of Sanitary Lines by Vacuum Trucks | Weekly | Starts immediately and reported December 2020 and then annually | Utilities Department |
| Inspection of Sanitary Lines | Weekly | Starts immediately and reported December 2020 and then annually | Utilities Department |

## Household Hazardous Waste and Used Motor Vehicle Fluids

In an effort to decrease the risk of contaminating storm water and surface water, the City has developed a community-based household hazardous waste ("HHW") collection and education program aimed at increasing community awareness and participation in proper disposal of HHW. This program is intended to provide education on HHW through a mass media campaign, as well as to conduct biannual HHW collection events in addition to maintaining a permanent Household Hazardous Waste Collection Facility ("HHWCF").

In order to deal with HHW generated by the citizens of Laredo, the Environmental & Solid Waste Services Department has implemented a HHW Collection Program, which includes a permanent residential hazardous waste drop-off facility as well as a couple of collection events per year that take place in the spring and fall. This program has been extremely effective in reducing the improper disposal of HHW. Over the years, the Environmental & Solid Waste Services Department has sustained a gradual increase in cost to support this successful program by faithfully budgeting the accounts that sustain the transportation and disposal fees involved in running this program. Part of the budget is dedicated for education and awareness campaigns for the program. The program has collected and properly recycled, reused, and disposed of over a million pounds of HHW materials since the program's inception.

Due to its tremendous success, the Environmental & Solid Waste Services Department proudly supports and grows this program and will continue to host biannual collection events as well as continue operations at the permanent HHWCF.

In an effort to reduce the hazards of storm water and surface water contamination by the indiscriminate dumping of used oil, a used oil recycling program was established in the City of Laredo. This project implemented a community-wide oil recycling system and an educational program directed at increasing community knowledge and participation in the used oil recycling program. This program has been in place since May 1994.

The used oil recycling program consists of neighborhood drop-off stations throughout the City. The City has acquired four (4) 450-gallon neighborhood collection bins for placement in neighborhoods throughout the City, one trailer and collection tank to pick up used oil from the neighborhood collection sites, and a central collection tank located at the Department of Public Works to act as the primary collection facility. The used oil is received by a contracted oil recycling company, which is responsible for analyzing for contaminants, recycling, and/or proper disposal. The Recycling Coordinator provides community education at local schools (as part of presentations on recycling) and on the City's Public Access TV channel. Also, literature on oil recycling is distributed at community and school events, along with free individual spill resistant oil change receptacles.

The City currently accepts used oil at various locations distributed throughout the City, using the neighborhood collection bins. Currently, the neighborhood collection bins are found at the following locations:

**City of Laredo Landfill**
2 miles East of the Intersection of HWY 359 & Loop 20 on Hwy 359
**Fire Station #3 (Civic Center)**
2420 San Bernardo Avenue
**Fire Station # 9**
11700 Mines Rd.
**Department of Public Works**
5512 Daughtery

**Household Hazardous Waste and Used Motor Vehicle Fluids**
Measurable Goals

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Operation of the Household Hazardous Waste Collection Center | Advertisement twice per year in print and television media. Social media advertisement four times per year. Information on collection center available on the Environmental Services website and Solid Waste website. | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services, Public Information Office |
| Maintenance of Used Oil Recycling Centers | Weekly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |

## MS4 Screening and Illicit Discharge Inspections

The MS4 screening program consists of developing a map of the Storm Sewer System for the City of Laredo, locating all storm water outfalls, including major outfalls, and choosing representative field screening points which will attempt to cover 100% screening. The task of sampling all the storm water outfalls will be divided into five (5) annual screening projects of 20% per year. A study on dry weather flow will be performed by collecting samples for laboratory analysis and drawing conclusions on the basis of field and laboratory results. Based on each year's laboratory test results, the environmental technicians will gradually add the task of resampling those outfalls suspected of having illicit discharges to the 20% storm water outfall screening project for that particular year.

A team of technicians will be assigned the task of selecting the outfalls to be tested, taking grab samples from the outfalls, transporting the samples to our headquarters, and performing the corresponding storm water outfall screening tests. Selection of the outfalls to be sampled will be based on the existing numeric identification system of the outfalls. A CHEMetrics™ analysis kit equipped with specific ampoules will be utilized for the analysis of ammonia, total chlorine, total copper, detergents, and total phenols. Also, an Orion M1230 microprocessor based multiprobe meter will be utilized to measure pH, conductivity, temperature, dissolved oxygen (DO), and salinity. Finally, a Quanti-Tray / 2000 with Colisure Test will be utilized to estimate *E. coli* numbers. The designated technicians will follow all necessary QA/QC measures. The dry weather screening schedule is devised to increase productivity by having technicians attend outfall locations in close proximity to one another on a regular basis. The program will be conducted in specific months of every year. All samples will be collected after at least a 72-hour period of dryness between storm events.

As previously mentioned, the Environmental & Solid Waste Services Department conducts CCTV inspections on the MS4 to identify illicit discharges weekly.

**MS4 Screening and Illicit Discharge Inspections**
Measurable Goals

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Dry Weather Inspections | 20% of the MS4 per year | 20% each year to be reported in December 2020 and then annually | Environmental & Solid Waste Services Department |

## Priority Areas

Within one year from the date of permit issuance, the City of Laredo will develop a list of priority areas likely to have illicit discharges. The City will continue to evaluate and update this list each year and report the results in the annual report.

**Priority Areas**
Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Priority Area List | Develop a priority area list within one year. Update list each year. | October 15, 2020 and then review and report annually | Environmental & Solid Waste Services Department |

## NPDES and TPDES Permittee List

The Environmental & Solid Waste Services Department maintains a list of NPDES and TPDES industrial permittees and the Engineering Department maintains a list of NPDES and TPDES construction permittees. These are updated as needed or on a monthly basis.

**NPDES and TPDES Permittee List**
Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| NPDES and TPDES Permittee List | Update list monthly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department, Engineering Department |

## MS4 Mapping

The Environmental & Solid Waste Services Department utilizes various technologies and equipment to prevent contaminants from entering the MS4. To address the prevention of contaminants as well as implementing the Department's programs, the "what," "where," "when," and "how many" questions are regularly answered by the development and use of the City's storm water Geographical Information System (GIS).

The primary use of the Department's GIS has been for the storm water management program. Every year, the department conducts storm water screening and monitoring activities at numerous locations where water exits the man-made portion of the MS4 and enters the natural environment of creeks and the Rio Grande. Database development is supported through the use of GPS (Global Positioning System) technology, drainage project as-builts, and storm system sub-surface camera investigations.

In 2010, in an effort to consolidate resources and to better serve internal and external clients, storm water GIS personnel and equipment were relocated from the Environmental & Solid Waste Services Department to the City's Building Department. Storm Water GIS personnel and equipment were more recently relocated to the City's Engineering Department.

The Engineering Department will update the GIS system monthly to reflect additions to the MS4. This is done by requiring as-builts for newly completed development and field inspections. Older data is updated when information is obtained by CCTV inspections and camera pole inspections.

**MS4 Mapping**
Measurable Goals

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| MS4 Mapping | GIS system will be updated monthly | Starts immediately and reported December 2020 and then annually | Engineering Department |

## Spill Prevention and Response

An internal municipal storm water pollution prevention program has been implemented in order to train city employees who work within specific city departments that have a higher chance of having accidental chemical spills, which in turn may run off to the local MS4 and potentially pollute the City's main waterways. Some of these departments include Public Works, Utilities, Fleet, and the Parks & Recreation departments. The program includes having Environmental & Solid Waste Services Department personnel conduct regular employee trainings at each of the identified departments in order to teach or refresh the employees on the most current BMPs available. Such BMPs include good housekeeping, spill prevention and response techniques, proper vehicle and equipment washing and maintenance techniques, proper spill reporting, MS4-protecting street maintenance techniques, pollution preventing outdoor storage of materials and wastes, and non-polluting landscaping and lawn care techniques.

Moreover, the City of Laredo Fire Department is responsible for the management and cleanup of hazardous material spills that pose an imminent threat to life or property or where permitted hazardous materials are involved. The Fire Department follows standard operating procedures when responding to spill situations. If the spill is located on private property, hired contractors will clean up and dispose of the spill material accordingly; however, if the spill occurs on the right-of-way, the Fire Department will properly clean up and dispose of the spill waste material.

In addition to ensuring that the private contractor or fire department spill clean-up crews contain, clean up, and properly dispose of the collected spilled waste material, the Environmental & Solid Waste Services Department may assists with advice or physically applying pollutant containment

BMPs in order to prevent the pollutant from running down into storm inlets, channels, creeks, etc. Additionally, the City has implemented a program to deal with hazardous waste generated and stored by conditionally-exempt small quantity generators ("CESQGs") and small businesses. This program has been in existence since 1999, and over the years, the City has assisted with the proper collection and disposal of a significant amount of hazardous waste from CESQGs. Furthermore, through the Hazardous Materials Permitting Division, the City has coordinated the proper disposal of thousands of pounds of hazardous abandoned material that had accumulated in many of the local warehouses. The City currently conducts quarterly training for hazardous materials handling and spill prevention and has trained a large number of people since 2001.

**Spill Prevention and Response**
Measurable Goals

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Spill Prevention Training | Quarterly | Starts immediately and reported December 2020 and then annually | Various City Departments |
| Hazardous Materials Handling Training | Quarterly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |
| Inspections of Hazardous Material Permittees | Inspection of permittees quarterly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |
| CESQG Collection Program | Yearly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |

## MCM 4 Pollution Prevention and Good Housekeeping Program

## Pollution Prevention and Good Housekeeping

The City has identified various City activities that could potentially affect the MS4 and has expedited activities to prevent pollution impacts to the MS4. The City conducts:

- Street Sweeping for City construction projects, in addition to an annual schedule for City-wide sweeping;
- Right of way mowing and mowed grass collection and removal;
- Storm system maintenance and cleaning, including detention facilities, on site detention ponds, and outfalls;
- City owned creeks and channels maintenance by City personnel and/or contractors;
- Commercially or privately owned creeks and channels maintenance scheduled inspections by City personnel to make sure private owners perform their contract agreed maintenance duties;
- Parks cleaning/mowing maintenance and regular emptying of trash disposal container dispensability at all parks;

- Special pet waste disposal containers maintenance and continual replacement of collection bags at City parks;
- Integrated Pest Management (IPM) plan development at parks and other city owned open space areas;
- As part of the IPM plan, any private contracted commercial applicator shall have to follow all pesticide, herbicide, and fertilizer application rules on city property;
- Proper collection and disposal of accumulated storm water runoff waste;
- Landfill erosion and solid waste control maintenance;
- Municipal curbside solid waste activities;
- Wastewater and water treatment facility storm water protection operations;
- Operation and maintenance of lift stations.
- Implementation of training and BMPs to reduce pollutants from equipment yards (sand filters at Public Works), road repair activities, and maintenance facilities.

In addition to these identified activities, the City has developed a Storm Water Protection Guidance Manual for public and private projects.

In general, the City's programs to operate and maintain City-owned structural and non-structural BMPs, as outlined in this SWMP, have been and continue to be fully implemented.

Moreover, the City has implemented training programs that include employee training with the ultimate goal of preventing or reducing pollutant runoff from municipal operations. Training Programs inform public employees of the impacts associated with illegal discharges and improper disposal of waste from municipal operations.

The Environmental & Solid Waste Services Department provides an annual storm water pollution prevention BMPs and good housekeeping techniques training for City employees who work in departments which perform mechanical maintenance work in City vehicles, handle and/or store potential polluting materials on their yards, and/or operate a significantly large fleet of regular or large/heavy vehicles. Such City departments include Fire, Utilities, Public Works, Police, Fleet Maintenance, Parks & Recreation, and Health.

In order to minimize excessive pesticide application and/or over fertilization of public green areas, which may contribute to run off pollution of our waterways, the Parks Department with collaboration of Environmental & Solid Waste Services Department personnel will continue to provide proper pesticide and fertilizer application trainings to any City employee and/or contracted individuals who apply pest control and plant growth materials on any public green areas. These techniques include focused BMPs, following label requirements, avoiding/minimizing the use of extremely hazardous pesticides, and utilizing non-pesticide application techniques whenever possible.

The Utilities and Public Works departments, with cooperation from the Environmental & Solid Waste Services Department, will continue to train their personnel on how to best apply storm water pollution runoff prevention BMPs whenever they have to conduct fixing or maintenance work on any part of the MS4.

Overall, through the City's compliance with Phase I of the NPDES/TPDES regulations, training of City personnel is conducted by individual departments and emphasizes prevention and reduction of pollutant runoff from municipal operations.

Finally, the City is currently implementing a program for structural control maintenance where the City inspects all public and private facilities and is requiring a maintenance schedule for these facilities. The City will enforce these maintenance schedules on privately owned facilities through Maintenance and Monitoring Agreements ("MMAs"). This program will be fully implemented within one year of the issuance of the City's permit.

**Pollution Prevention and Good Housekeeping**

Measurable Goals

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Street sweeping | Weekly | Starts immediately and reported December 2020 and then annually | Public Works Department |
| Right-of-Way Mowing | Weekly | Starts immediately and reported December 2020 and then annually | Public Works Department |
| Inspection of Privately-owned Facilities to Ensure Maintenance | Inspections will be conducted once per year | All inspections will be completed by October 15, 2020, and then annually thereafter | Environmental & Solid Waste Services Department |
| Parks Cleaning/Mowing and Removal of Trash | Daily | Starts immediately and reported December 2020 and then annually | Parks and Recreation Department |
| Pet waste disposal containers maintenance | Weekly | Starts immediately and reported December 2020 and then annually | Parks and Recreation Department |
| Integrated Pest Management ("IPM") plan development and review | Develop an IPM plan within one year. Review yearly. | IPM plan will be developed by October 15, 2020. Reviewed annually thereafter. | Parks and Recreation Department |
| Collection of municipal trash | Weekly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |
| Landfill erosion and solid waste control maintenance | Weekly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |
| Maintenance of lift stations | Weekly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |

| | | | |
|---|---|---|---|
| Training of Employees | Quarterly training will be provided | First training will be held prior to October 15, 2020, and then quarterly thereafter | Environmental & Solid Waste Services Department, Utilities Department, Parks and Recreation Department, Public Works Department, Fleet Department |

## Waste Handling

Sediment and floatables collected through the implementation of MS4 maintenance BMPs are disposed of properly. Waste materials collected are weighed and disposed of at the City's permitted landfill. Any automotive fluids, *e.g.*, oil or antifreeze, collected through vehicle maintenance operations are disposed of through contracted services.

Overall, through the City's compliance with Phase I of the NPDES/TPDES regulations, waste disposal from maintenance of the City MS4 and other municipal activities is completed in accordance to applicable waste regulations.

**Waste Handling**
Measurable Goals

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Weighing of waste materials removed from the MS4 and disposed at the City's permitted MSW landfill | Weekly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department, Public Works Department |

## Pesticide, Herbicide, and Fertilizer Application

Certain water quality problems can be traced to pollutants associated with pesticides, herbicides, and fertilizers ("PHFs"). Pesticides and herbicides in storm water runoff can degrade water quality and often have a toxic effect on sensitive organisms even at very low concentrations. Fertilizers are also capable of degrading water quality. Excessive phosphates, nitrates, and other nutrients in water bodies may create a eutrophic condition, which may lead to an excessive growth of microscopic organisms, such as algae, which in turn leads to excessive oxygen consumption required to sustain their growth, which in turn reduces dissolved oxygen levels (anoxic condition) necessary to sustain aquatic life.

Manufacturers of pesticides conduct extensive research in developing the optimum pesticide dosage and application conditions to minimize the environmental impact. By law, pesticides must contain the manufacturer's directions for use. Compliance with application directions is the critical condition for effectively controlling pesticides. Application is almost exclusively under human control and rarely, if ever, automated. Hence, regardless of how diligent a manufacturer is in formulating and communicating usage instructions, the release of pesticides outside of any given

target area is likely if the instructions are not read/learned and followed. This applies to all users including homeowners, professional applicators, and municipal employees.

Hence, the key element in controlling the release of PHFs into the storm water system is to ensure, to the maximum extent possible, that applicators have sufficient knowledge of their proper use. Basically, the means of instruction falls into two categories: public education and licensing programs, both of which are part of a good Integrated PHF Management Program. A well-Integrated PHF Management program follows an approach which evaluates different control options for the regulation of weed growth, horticultural diseases, insects and others. PHF Management is based on effectiveness, environmental impact, site characteristics, economics and worker/public health and safety. Control options include biological, cultural, manual, mechanical and chemical methods to prevent or remedy unacceptable pest activity or damage. A PHF Management Program utilizes all appropriate pest management options. The goal of a PHF Management system is to manage pests and the environment to balance benefits of control, costs, public health, and environmental quality.

The PHF Management Program is currently being administered by the Parks and Recreation Department in collaboration with the Public Works, Health, and Environmental & Solid Waste Services departments.

The purpose of a PHF Management Program is to efficiently and effectively protect lives, property, and the environment of our community by reducing the impact of flooding, erosion and water pollution potentially caused by the runoff of different types of pollutants including PHFs which may enter the City's MS4 and ultimately into the watershed receiving waters. The IPM Program also assists our City in maintaining compliance with state and federal rules regarding the application of pesticides (including herbicides, insecticides fungicides, and rodenticides on City property. This IPM program will be implemented within one year of the issuance of our permit.

Additionally, the City will develop an Integrated Pest Management (IPM) within one year of our permit issuance where all new commercial development will need to submit an Integrated Pest Management Plan as part of their Maintenance and Monitoring Agreements (MMA). This will discharge pollutants over lands not owned by the City of Laredo.

**Pesticide, Herbicide and Fertilizer Application**
Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Integrated Pest Management ("IPM") plan development and review | Develop an IPM plan within one year. Review yearly. | IPM plan will be developed by October 15, 2020. Reviewed annually thereafter. | Parks and Recreation Department |

## List of Municipal Facilities

The City's Zacate Creek Waste Water Treatment Plant(WQ0010681002), Southside Waste Water Treatment Plant (WQ0010681003), North Laredo Waste Water Treatment Plant (WQ0010681004), Colombia Bridge Waste Water Treatment Plant(WQ0010681006), Jefferson Water Treatment Plant (WQ0010681001), Penitas Waste Water Treatment Plant (WQ0010681007), Sombreretillo Waste Water Treatment Plant (WQ0010681008), Unitec Waste

Water Treatment Plant(WQ0010681005), and Manadas Creek Waste Water Treatment Plant (WQ0015501001) are permitted and remain in compliance. Additional permitted facilities are the City of Laredo MSW Landfill (TXR05DC19), the Ponderosa Regional Landfill (TXR05ET01), and the Laredo International Airport (TXR05V022), all of which remain in compliance.

## MCM 5 Industrial and High Risk Runoff

## Programs to identify and control pollutants in storm water discharges

### Industrial Storm water Compliance Program

The City has implemented a compliance program for the monitoring and compliance of industries within the City of Laredo by passage of a city ordinance. The City of Laredo initiated an education campaign targeting industrial facilities and staff in an attempt to educate and inform industries of the necessity to comply with the former NPDES, now TPDES, required industrial storm water discharge permit, and advising them of the City Ordinances mandating compliance. Industrial facilities must prepare a comprehensive Storm Water Pollution Prevention Plan ("SWPPP"), which will facilitate the performance of all tasks necessary to comply with current TCEQ guidelines for storm water discharges. Industrial facilities which store/handle hazardous materials will also be required to comply with the City's Hazmat Ordinance.

Personnel from the Environmental & Solid Waste Services Department will conduct site inspections of the facilities to identify if a Notice of Intent ("NOI") has been submitted or a permit has been issued, and to determine compliance with the City Ordinances. The Environmental & Solid Waste Services Department will also address any concerns and discuss possible options the facility owner(s) and staff might have. Industrial facilities will be prioritized according to their potential for pollution production and discharge. The Environmental & Solid Waste Services Department will determine which facilities will be inspected more frequently according to their previous inspection records and the amount of pollution being discharged. Inspections will be unannounced and the Environmental & Solid Waste Services Department inspectors will follow a standardized inspection sheet, which will cover all the necessary attributes for compliance. If a facility is found to be in non-compliance, the proprietor will be notified, given a Notice of Violation(s) ("NOV"), and/or cited. The operator will further be required to initiate a remediation program within thirty (30) days and be in full compliance within sixty (60) days from the date of notification and/or citation or face further legal enforcement including severe fines.

A database of active industrial facilities will include a risk level value for each of the facilities. The risk level will consist of a simple three number system (1-3) with the number one (1) being low risk, the number two (2) being medium risk and the number three (3) being high risk. All number 3 risk level facilities will be inspected three (3) times per year.

Facilities with inadequate inspection results will be visited monthly until compliance is obtained and then two (2) to four (4) times yearly until analytical sampling and inspection results show continuous compliance for six (6) months, after which inspection intervals will revert back to yearly at a minimum. Additionally, the City shall review monitoring data submitted for facilities under any TPDES storm water permit, EPCRA Title III, Section 313 industrial facilities, and hazardous waste treatment, disposal, and recovery facilities. Sites under this designation will be inspected quarterly.

Any operator found to be in noncompliance will be required to submit a revised SWPPP which includes, at a minimum the following items:

| | |
|---|---|
| Pollution prevention team | Description of pollutant sources |
| Drainage area and calculations | Inventory of exposed materials |
| Spills and leaks | Sampling data |
| Risk identification | Summary of potential pollutant sources |
| Measures and controls | Good housekeeping requirements |
| Preventive maintenance | Spill prevention & response procedures |
| Internal inspections | Employee training |
| Non-storm water discharges | Record keeping and internal reporting |
| Sediment and erosion control | Management of runoff |

**Industrial Storm Water Compliance Program**
Measurable Goals

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Inspections at MSW landfill for compliance with TPDES storm water permit | Once per year | Will be inspected once prior to October 15, 2020, and then annually | Environmental & Solid Waste Services Department |
| High Risk Industrial Storm Water Inspections | Three (3) times per year | Will be inspected once prior to October 15, 2020, and three times per year | Environmental & Solid Waste Services Department |
| Inspection of EPCRA Title III, Section 313 facilities | Quarterly | Will be inspected quarterly in each permit year | Environmental & Solid Waste Services Department |
| Develop and maintain a list of active industrial facilities identified by risk level | Develop list by December 2020 and then update twice per year | List will be developed by December 2020 and then updated twice per year | Environmental & Solid Waste Services Department |

## Landfill's Storm Water Discharge Monitoring Program

The City of Laredo owns and operates two (2) Type 1 municipal solid waste landfills.

The City of Laredo MSW Landfill, which is situated approximately 1.96 miles east of the LOOP 20 and SH-359 intersection. This 200-acre permitted landfill, TCEQ Permit No. MSW-1693A, has been in operation since 1986 and had an initial design lifespan of twenty (20) years. The City has received a permit amendment that will extend the lifespan of the landfill fifteen (15) years. The City developed a SWPPP in compliance with the requirements of the TPDES Multi-Sector General Permit (MSGP), TPDES Permit No. TXR050000, obtaining authorization No. TXR05DC19 effective November 15, 2016. The SWPPP and sampling activities at the City's MSW landfill are in compliance with the MSGP.

The City has implemented major modifications to comply with Subtitle D requirements, including a new cell liner, ground water monitoring wells, a leachate collection system, and erosion control

practices. The City of Laredo Environmental & Solid Waste Services Department maintains compliance with the SWPPP.

The City owns and operates a second MSW landfill – the Ponderosa Regional Landfill, TCEQ Permit No. MSW-2286. The Ponderosa Regional Landfill is a 499-acre permitted Type I MSW landfill with a disposal footprint of approximately 347 acres. It has been in operation since 2013 and has a design life span of approximately 94.3 years. The City purchased the Ponderosa Regional Landfill in 2020. A SWPPP has been developed for the Ponderosa Regional Landfill in compliance with the requirements of the TPDES MSGP. The MSGP authorization number assigned to the Ponderosa Regional Landfill is TXR05ET01. The SWPPP and sampling activities at the Ponderosa Regional Landfill are in compliance with the TPDES MSGP, Laredo ordinances, and the Laredo MS4 permit.

**Landfills' Storm Water Discharge Monitoring Program**
Measurable Goals

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Inspections at MSW landfills for compliance with TPDES storm water permit | Once per year | Will be inspected once prior to October 15, 2020, and then annually | Environmental & Solid Waste Services Department |

## MCM 6 Construction Site Storm Water Runoff

### Program to reduce discharges of pollutants into the MS4 from construction sites.

Reduction of pollutants such as sediment into the MS4 begins with the Subdivision Plat Approval process, where City staff reviews construction plans and reports for proposed public improvements of a submitted plat. The importance of the process is to assure Subdivisions meet all Local, State, and Federal Guidelines and Ordinances (such as the City's Storm Water Management Ordinance). Engineers representing the Subdivision are responsible in assuring that all required submittals such as Construction Plans, SWPPPs, and Reports be presented to the One Stop Shop ("OSS") Committee for review and approval. The OSS meets every two (2) weeks and reviews these plans to make sure that the proposed development meets all legal requirements. If deficiencies in the plans are found, the consulting engineer of the subdivision or commercial site is notified and the process is not allowed to continue until an approval letter is issued by the City. Once all approval letters are issued the project is allowed to continue after a preliminary approval of the Planning and Zoning Commission is granted. Inspection staff are assigned to the project after this initial approval. The next step for a development is to file an NOI with the State and this NOI must be submitted to the City, and proof (followed up by an inspection) of the implementation of BMPs such as silt fencing, so that a Clearing and Grubbing Permit is issued. Afterwards, a pre-construction meeting is held with the developer and staff to review the project and discuss any issues with the development. As construction begins staff periodically visits the site to assure compliance with City engineering standards as well as to ensure storm water BMPs are maintained and functioning as designed. If deficiencies are observed, inspectors will require the developer to correct them. If deficiencies are not corrected, staff inspectors may

issue Stop-Work-Orders or citations. Upon completion of the development, the City holds a pre-final construction meeting with the developer to inspect the site for compliance with the City's engineering standards and storm water BMPs. If deficiencies are observed the developer is required to correct them and if compliance is not obtained the City will issue citations and/or not allow for the project to receive final plat recordation approval. A final plat recordation is needed in order to obtain a building permit from the Building Services Department. Once the development has finished and obtained plat recordation then individual builders must obtain building permits from the City. As part of this process, City inspectors inspect the building site at various times to assure compliance with building standards as well as compliance with storm water regulations. Again, Stop-Work-Orders as well as citations may be issued to assure compliance. Finally, once the structure is complete the City will conduct a final inspection to make sure the site is in compliance before a Certificate of Occupancy ("CO") is issued. If the site is deficient in any building standard or storm water requirement, then the site will not be issued a CO.

To assure compliance and educate the development community, the City will offer SWPPP and BMP educational trainings for construction site operators as well as Engineers on an annual basis.

**Program to reduce discharges of pollutants into the MS4 from construction sites**
Measurable Goals

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Review of construction plans (OSS) | Bi-monthly | Starts immediately and reported December 2020 and then annually | Engineering Department |
| Issuance of construction permits. | Bi-monthly | Starts immediately and reported December 2020 and then annually | Building Services Department, Engineering Department |
| Inspections of construction sites. | Three (3) times per development as a minimum | Starts immediately and reported December 2020 and then annually | Engineering Department |
| Issuance of building permits. | Weekly | Starts immediately and reported December 2020 and then annually | Building Services Department |
| Inspection of building permit sites. | Weekly | Starts immediately and reported December 2020 and then annually | Engineering Department |
| Training for Developers and Builders | Annually | Starts immediately and reported December 2020 and then annually | Building Services Department, Engineering Department, Environmental & Solid Waste Services Department |

The City has also adopted a Storm Water Management Guidance Manual that identifies suggested BMPs.

## Lists of Sites

The City of Laredo's Engineering Department maintains a list of construction sites and their corresponding TPDES permit number. This list includes the name, location, and permit number. This list is maintained bi-monthly.

## Construction Site Inspections

As mentioned previously, the City assigns staff to review and inspect developments through the Engineering Department from clearing and grubbing of the site to the issuance of the CO.

# MCM 7 Public Education, Outreach, Involvement, and Participation

The Public Education, Outreach, Involvement, and Participation minimum control measure consists of BMPs that focus on the development of educational and media materials designed to inform public employees, businesses, and the general public of hazards associated with the illegal discharges and improper disposal of waste and about the impact that storm water discharges can have on local waterways, as well as steps the public can take to reduce pollutants in storm water systems. Specifically, these efforts are to teach the importance of protecting storm water quality for the benefit of the environment and human health. The role of each community member at home and at work are a particular emphasis.

The City currently has a variety of programs such as the Household Hazardous Waste ("HHW") Collection program and the Love Laredo B.I.G. (Bag It Green) Campaign to help address these issues and educate the residents on how to reduce storm water pollutants. The City also collaborates with Keep Laredo Beautiful ("KLB") in coordinating and hosting numerous tree planting events and creek clean-ups throughout the year. The City also provides supplies for the City Beautification Program and the Storm water Mural Installations with KLB. Furthermore, educational information and materials about storm water are also provided through the City at numerous special events with other departments throughout the year. The City assists in planning and hosting numerous annual events such as Senator Judith Zaffirini's Environmental Summit, the Rio Grande International Study Center's Earth Day, and the Lamar Bruni Vergara Environmental Science Center's Earth Day events.

The City of Laredo Environmental & Solid Waste Services Department will coordinate the record compilation of outreach activities by the staff including quantities of literature and promotional items distributed, records of media contacts, public speaking engagements, events, and meetings attended. Documentation shall be detailed enough to demonstrate the number of resources used to address each group. Evaluation of the success of this minimum control measure will be through careful analysis of the measurable goals for each BMP included in this minimum measure. The City of Laredo public education BMPs target all sectors of the public including residents, visitors, public service employees, businesses, commercial and industrial facilities. The City of Laredo will continue to refine the public education and outreach program and will summarize the annual activities in the Annual Report.

# Public Education and Outreach

**General Education on Storm Water**
The City will develop articles related to storm water such as the SWMP, storm water pollution prevention, reducing pet waste by the public through promoting use of pet waste bags, public events such as Earth Day and Household Hazardous Waste Event, better landscaping practices, and the effects of pet waste on storm water. The articles will be provided to residents through print publications, social media, and printed on handouts to be distributed at public events and displayed at other City of Laredo departments, or other available avenues.

**General Education on Storm Water**
Measurable Goals

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Develop print media to handout for the Household Hazardous Waste Events twice per year | Twice per year | Twice prior to October 15, 2020, and then twice per year | Environmental & Solid Waste Services Department |
| Print event information and distribute at City and County events | Once per year | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |
| Provide and distribute general storm water brochures at community events and at other City offices | Once per year | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |
| Provide storm water education and BMPs to children grades K – 12. Visit a minimum of ten (10) schools each year. | Ten schools per year. | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |
| Distribute storm water promotional items at events that are relevant to environmental and storm water pollution. | Goal is to distribute 5,000 items per year. | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |

**Storm Water Social Media Content**
Social media has proven to be a useful method for reaching residents. Therefore, the City will post information about storm water-related issues and events on the City's social media content as appropriate and within the City's posting guidelines.

**Storm Water Social Media Content**
Measurable Goals

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Continue to post new information and events as it becomes available. | Post new information and event information at least once per quarter | Starts immediately and reported December 2020 and then annually. | Environmental & Solid Waste Services Department |
| Post general stormwater educational information on the City's social media outlets. | Post at least two times per year. | Starts immediately and reported December 2020 and then annually. | Environmental & Solid Waste Services Department |

**PSAs and other MEDIA Advertisement**
Share Public Service Announcements ("PSAs") and Video advertisements in a variety of city and public media outlets. The focus will be on storm water runoff and steps the public can take to reduce storm water pollution

**PSAs and Other MEDIA Advertisement**
Measurable Goals

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Publish and promote PSAs and Video media content through City and various other businesses. Topics to promote include events and BMPs that can contribute to improved storm water quality. | Once per year. | October 15, 2020 and then annually | Environmental & Solid Waste Services Department |

## Public Involvement and Participation

**Storm water Education at Special Events**
The City sponsors and co-sponsors special events such as the Kite Festival, Environmental Summit, and various events throughout the year where information regarding storm water will be distributed at a minimum of two events annually. The City assists Keep Laredo Beautiful in planning and hosting events and beautification projects where the City staff and KLB members set up booths or hand out information to attendees, as well as discuss storm water pollution issues during conversations at the events. Public events are great opportunities to reach residents, businesses, and visitors to the City

**Storm Water Education at Special Events**
Measurable Goals

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Attend public events throughout the year and distribute storm water educational materials to event attendees. Report a summary of the items purchased for the events and total estimated attendance. | At least two events per year. | October 15, 2020, and then annually | Environmental & Solid Waste Services Department, Keep Laredo Beautiful |

**Creekside Clean-Up Events**
City staff and KLB collaborate to host the Chacon Creek and other cleanup events designed to keep large items, floatables, and debris, from entering the waterways. Cleanup events are an excellent activity to create local ownership of environmental resources, educating the public and preventing pollutants from entering local waterways.

**Creekside Clean-up Events**
Measurable Goals 2019-2024

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Continue to collaborate with KLB for the Creekside Clean-up events. Track the location of each event, the number of participants, and the weight/volume of items removed. | Once per year. | October 15, 2020, and then annually | Environmental & Solid Waste Services Department, Keep Laredo Beautiful, Parks and Recreation Department |

**Household Hazardous Waste ("HHW") Program and Event**
The City owns and operates a Household Hazardous Waste Collection Center ("HHWCC") located at 6912 TX-359, Laredo, TX 78043. It is open to the public on specific dates throughout the year. Residents may drop off electronic wastes and household hazardous waste such as aerosol cans, paint, fertilizers, oil, and cleaning products. In addition, the City hosts the bi-annual Household Hazardous Waste Events.

**Household Hazardous Waste ("HHW") Collection Program and Event**
Measurable Goals

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Continue to offer the service for residents to drop off HHW at the City's HHWCC. Record the weight of materials collected, the amount recycled, the amount sent off for disposal, and participation of Laredo residents and other communities utilizing the facility. | Record identified information quarterly. | Report December 2020 and then annually. | Environmental & Solid Waste Services Department |
| Continue to provide the City's bi-annual HHW event for those who cannot make it to the HHWCC | Twice per year | Once by October 15, 2020, and then twice per year afterwards | Environmental & Solid Waste Services Department |

**Neighborhood Beautification Program**
The City will provide most supplies and labor for various small neighborhood-wide cleanups and tree planting events. The City takes part in assisting to organize the cleanup. The program is very successful and the City has had thousands of volunteers in the community cleanup events.

**Neighborhood Beautification Program**
Measurable Goals

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Continue to provide supplies, materials, and labor for neighborhood cleanup and tree planting events. Track the location of each event, the number of participants, and the weight/volume of items removed. | At least one event per year. | October 15, 2020, and then annually | Environmental & Solid Waste Services Department |

**Love Laredo B.I.G. Pledge and Program**

The City and the non-profit group, Rio Grande International Study Center ("RGISC"), collaborate on the Love Laredo B.I.G. (Bag It Green) Campaign. This campaign promotes the use of reusable

bags and educates the public about the environmental and storm water pollution hazards single-use plastic bags cause. The campaign asks community members and businesses to pledge to stop offering plastic bags and reduce single-use plastic.

**Love Laredo B.I.G. (Bag It Green) Pledge and Program**
Measurable Goals

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| City will continue to develop print media on reusable bags and other "Bag It Green" items to promote the campaign and educate the public on best practices in removing single-use plastic. | Goal is to distribute reusable bags at every city and county event throughout the year. Attend a minimum of 10 city/county events throughout the year.<br><br>Goal is to distribute 1000 other "Bag It Green' items each year as prizes. (*i.e.*, Reusable Utensils and straws). | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department, Keep Laredo Beautiful, |
| Share information on the City website and social media to promote taking the Pledge to Love Laredo B.I.G. | Once per year on City website and twice per year on social media | Reported December 2020 and then annually | Environmental & Solid Waste Services Department, Keep Laredo Beautiful, |

## MCM 8 Monitoring, Evaluating, and Reporting

### Dry Weather Screening Program

The dry weather field screening program consists of developing a map of the Storm Sewer System for the City of Laredo, locating all storm water outfalls, including major outfalls, and choosing representative field screening points which will attempt to cover 100% screening. The task of sampling all the storm water outfalls will be divided into five (5) annual screening projects of 20% per year. A study on dry weather flow will be performed by collecting samples for laboratory analysis and drawing conclusions on the basis of field and laboratory results. Based on each year's laboratory test results, the environmental technicians will gradually add the task of resampling those outfalls suspected of having illicit discharges to the 20% storm water outfall screening project for that particular year. A residential major outfall consists of a 36-inch pipe or larger into which one or more drainage areas connect through an elaborate pipe system. These major outfalls discharge their total drainage storm water volume into a major creek or channel leading to the Rio Grande, or they discharge directly into the Rio Grande. Differentiating from the previously mentioned non-industrial major outfalls, only by the pipe diameter, a major outfall for an industrial zoned area is considered to be a 12-inch storm drain pipe or larger which directly drains into a major creek, major channel, or directly into the Rio Grande.

A team of technicians will be assigned the task of selecting the outfalls to be tested, taking grab samples from the outfalls, transporting the samples to our headquarters, and performing the corresponding storm water outfall screening tests. Selection of the outfalls to be sampled will be based on the existing numeric identification system of the outfalls. A CHEMetrics™ analysis kit equipped with specific ampoules will be utilized for the analysis of ammonia, total chlorine, total copper, detergents, and total phenols. Also, an Orion M1230 microprocessor based multiprobe meter will be utilized to measure pH, conductivity, temperature, dissolved oxygen (DO), and salinity. Finally, a Quanti-Tray / 2000 with Colisure Test will be utilized to estimate *E. coli* numbers. The designated technicians will follow all necessary QA/QC measures. The dry weather screening schedule is devised to increase productivity by having technicians attend outfall locations in close proximity to one another on a regular basis. The program will be conducted in specific months of every year. All samples will be collected after at least a 72-hour period of dryness between storm events.

**Program Schedule:**

Dry weather screening of all known storm water outfalls will be completed in a five-year period by sampling 20% of the total number of outfalls for each of the five (5) years that cover the permit's period. In addition to the annual 20% outfall screening, samples will be collected from those outfalls that are suspected of having illicit discharges for the remaining permit term.

**Dry Weather Screening Program**
Measurable Goals

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Dry weather screening | 20% of the MS4 per year | 20% each year to be reported in December 2020 and then annually | Environmental & Solid Waste Services Department |

## Wet Weather Screening Program

The Wet Weather Screening Program is implemented in addition to the representative wet weather monitoring program. It serves a similar purpose in that, for the life of the permit, its intention is to screen for pollutants within the City's four (4) major watersheds during storm events. Screening will be conducted twice a year for each of the watersheds.

Four (4) grab sample locations, one (1) per watershed, will be chosen based on accessibility and safety of the location; thus, alternate locations may be chosen which will remain representative of the discharging watershed. The four (4) watersheds to be tested are Chacon, Zacate, Upper Zacate, and Manadas watersheds.

Environmental & Solid Waste Services Department personnel conduct the field collection, perform the collected sample testing, record the findings obtained, and perform an analysis of the results for the two (2) yearly rain events. This analysis serves to better evaluate the need for continuing current water shed protection BMPs and also consider the need for additional projects.

The City staff will perform analysis of the collected samples by using a CHEMetrics™ analysis kit equipped with specific ampoules for the analysis of ammonia, copper, total chlorine, phenols and

detergents. Additionally, an Orion M1230 microprocessor based multiprobe meter will be utilized to measure pH, conductivity, temperature, DO, and salinity. Finally, a Quanti-Tray / 2000 with Colisure Test will be utilized to estimate *E. coli* numbers. The designated technicians will follow all QA/QC measures necessary.

**Wet Weather Screening Program**
Measurable Goals

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Wet weather screening in four (4) watersheds | Bi-annually (twice per year) | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |

## Industrial and High Risk Runoff Monitoring Program

## Storm Event Discharge Monitoring

The representative wet weather monitoring program was developed by the City of Laredo to characterize the quality of storm water discharges from the MS4. Five (5) representative monitoring outfall locations have been established, based on land-use, and are described below:

Outfall 001 – Station located at 601 West Canal Street approximately 300 yards east of I-35 on West Canal between Pep Boys and Stein Mart
Outfall 002 – Station located at 102 West Guerrero Street on Zacate Creek
Outfall 003 – Station located at the intersection of Bustamante Street and Meadow Street
Outfall 004 – Station located at 602 Enterprise Street
Outfall 005 – Station located at 517 Jefferson Street at San Eduardo Street

These outfall are sampled at least once per season for representative storm events, which is greater than 0.1 inches in magnitude and occurs at least 72 hours from the previously measurable storm event. Analysis and collection of samples are in accordance with the methods specified in 40 C.F.R. Part 136. The parameters analyzed from each sample are as follows - in milligrams per liter (mg/L) except as indicated:

Biochemical Oxygen Demand, 5-day
Chemical Oxygen Demand (COD)
Oil and Grease
Total Suspended Solids (TSS)
Total Dissolved Solids (TDS)
Total Nitrogen
Total Kjeldahl Nitrogen (TKN) (i.e., ammonia nitrogen plus nitrate-nitrogen)
Total Antimony
Total Arsenic
Total Phosphorus
Dissolved Phosphorus
Total Cadmium (µg/L)
Total Chromium (µg/L)
Total Copper (µg/L)

Total Lead (µg/L)
Total Mercury (µg/L)
Total Nickel (µg/L)
Total Silver (µg/L)
Total Selenium (µg/L)
Total Thallium (µg/L)
Total Zinc (µg/L)
Chlordane (µg/L)
4, 4' - DDE (µg/L)
Total Polychlorinated biphenyls (PCBs) (µg/L)
Methylene Chloride (µg/L)
Toluene (µg/L)
E.coli (MPN/100 mL)
pH (report daily minimum and daily maximum results in standard units, "S.U.")
Hardness (as CaCO3)
Temperature (°C)
Atrazine (µg/L)

**Storm Event Discharge Monitoring**
Measurable Goals

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Sampling of storm water | Once per season defined in permit | October 15, 2020, and then annually | Environmental & Solid Waste Services Department |

## Floatables Monitoring

As mentioned previously the City of Laredo will weigh and document all floatables removed from the MS4 through creek cleaning activities, vacuum truck MS4 cleaning, and floatable controls that will be properly disposed of at the landfill.

**Floatables Monitoring**
Measurable Goals

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Weighing and documenting floatables removed from MS4 | Weekly | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |

## Impaired Water Bodies and TMDL requirements

The City of Laredo discharges directly into a water quality-impaired water that does not have an approved TMDL (Rio Grande), thus:

(1) By October 15, 2020, the City must determine whether the MS4 may be a source of the pollutant(s) of concern. The pollutant of concern is bacteria.

(2) The City has determined that the MS4 may discharge bacteria to an impaired water body without a TMDL. Therefore, the City has included in this SWMP focused BMPs, along with corresponding measurable goals that the permittee will implement to reduce the discharge of bacteria.

It must be noted that the major contributor of bacteria to the Rio Grande is Laredo's Sister City in Mexico, Nuevo Laredo. Nuevo Laredo has reduced its bacterial pollutant load to the Rio Grande significantly through a waste water treatment plant funded through NAD Bank; however, Nuevo Laredo continues to contribute approximately 7 million gallons of raw sewage to the Rio Grande daily due to aging and substandard infrastructure. Moreover, there is no legal equivalent MS4 permit program that exists in Mexico.

The City will address this issue through these additional BMPs:

**Sanitary Sewer Systems**
The Utilities Department has implemented an Asset Management Program ("AMP") to identify needed improvements to sanitary sewers to reduce overflows and utilizes "Mission Control" software to monitor and address lift station issues and inadequacies. Moreover, the Utilities Department has strengthened sanitary sewer use requirements to reduce blockage from fats, oils, and grease ("FOG") with the implementation of an Industrial and High Strength Waste program that applies to all Food Services Establishments ("FSEs"), Food Processing Establishments ("FPEs"), and other commercial accounts. This program establishes a monitoring and surcharge program that assesses an additional surcharge that offsets added costs and operation loads the City encounters from treating Industrial and Commercial waste when the sewage concentrations are above the normal domestic Biochemical Oxygen Demand (BOD) and Total Suspended Solids (TSS) design concentrations of 250 mg/L.

**Animal Sources**
Additionally, the City is expanding management programs to address pet waste by installing pet waste bag dispensers in all City parks.

**Residential Education**
Finally, to reduce bacteria runoff the City has implemented public education programs to address proper pet waste disposal and FOG education to reduce clogging of sanitary sewer lines to reduce overflows.

**Monitoring and Assessment**
The City will continue to monitor and assess and document these programs and report the results in our annual report.

**Impaired Water Bodies and TMDL requirements**
Measurable Goals

| BMP/Activity | Frequency/ Quantifiable Target | Deadline | Responsible Department |
|---|---|---|---|
| Utilization of AMP to identify needed improvements sanitary sewer lines. | Weekly | Starts immediately and reported December 2020 and then annually. | Utilities Department |

| | | | |
|---|---|---|---|
| Utilization of “Mission Control” software to monitor lift stations. | Weekly | Starts immediately and reported December 2020 and then annually | Utilities Department |
| Implementation and monitoring of Industrial and High Strength Waste program on FOG | Monthly | Starts immediately and reported December 2020 and then annually | Utilities Department |
| Installation of pet waste bag dispensers in all City parks. | Quarterly | Starts immediately and reported December 2020 and then annually | Parks Department |
| Residential FOG public education | Monthly | Starts immediately and reported December 2020 and then annually | Utilities Department |
| Monitoring of programs | Annually | Starts immediately and reported December 2020 and then annually | Environmental & Solid Waste Services Department |

# ATTACHMENT 10

**Application for Renewal**

**for the City of Laredo**

**and Laredo College**

**TPDES Phase I MS4 Permit**

**TPDES Permit No. WQ0004592000**

**City of Laredo, Webb County, Texas**

**RN103014353**

**April 17, 2024**

This page replaces Tab 10 from hard copy.

# Attachment 10

## TCEQ ePay Receipt for Payment of Fee for Renewal of Laredo MS4 Permit

**Your transaction is complete. Thank you for using TCEQ ePay.**

**Note: It may take up to 3 working days for this electronic payment to be processed and be reflected in the TCEQ ePay system. Print this receipt and the vouchers for your records. An email receipt has also been sent.**

**Transaction Information**

| | |
|---|---|
| **Trace Number:** | 582EA000605155 |
| **Date:** | 04/04/2024 02:19 PM |
| **Payment Method:** | CC - Authorization 0000262692 |
| **ePay Actor:** | JOHN PORTER |
| **Actor Email:** | jporter@ci.laredo.tx.us |
| **IP:** | 198.135.47.250 |
| **TCEQ Amount:** | $2,015.00 |
| **Texas.gov Price:** | $2,060.59* |

* This service is provided by Texas.gov, the official website of Texas. The price of this service includes funds that support the ongoing operations and enhancements of Texas.gov, which is provided by a third party in partnership with the State.

**Payment Contact Information**

| | |
|---|---|
| **Name:** | JOHN PORTER |
| **Company:** | CITY OF LAREDO |
| **Address:** | 619 REYNOLDS STREET, LAREDO, TX 78040 8019 |
| **Phone:** | 956-794-1650 |

**Cart Items**

Click on the voucher number to see the voucher details.

| Voucher | Fee Description | AR Number | Amount |
|---|---|---|---|
| 700000 | MS4 PERMIT - PHASE I - RENEWAL | | $2,000.00 |
| 700001 | 30 TAC 305.53B WQ RENEWAL NOTIFICATION FEE | | $15.00 |
| | | **TCEQ Amount:** | $2,015.00 |

ePay Again | Exit ePay

**Note: It may take up to 3 working days for this electronic payment to be processed and be reflected in the TCEQ ePay system. Print this receipt for your records.**