STORMWATER MANAGEMENT PROGRAM (2025-2030)

Prepared in accordance with

TPDES Small MS4 General Permit TXR040000

CITY OF BRYAN

The Good Life, Texas Style.™

February 5, 2025

TPDES Small MS4 General Permit No. TXR0440336

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Acronyms

AST	Aboveground Storage Tank
BEE	Bryan Environmental Education
BCHD	Brazos County Health Department
BMPs	Best Management Practices
BBSEC	Brazos Basin Stormwater Education Committee
BVCOG	Brazos Valley Council of Governments
$CBOD_5$	Carboneous Biological Oxygen Demand
CCTV	Closed Circuit Television
City	City of Bryan
CFU	Colony Forming Units
CFR	Code of Federal Regulation
CSN	Construction Site Notice
DIY	Do It Yourself
GIS	Geographic Information System
GPS	Global Positioning System
HHW	Household Hazardous Waste
IDD&E	Illicit Discharge Detection & Elimination
I&I	Inflow and Infiltration
I-Plan	Implementation Plan
KBB	Keep Brazos Beautiful
LA_{SEG}	Allowable Load from Non-Permitted Sources within the Segment
LA_{TL}	Tributary Load Allocations Entering Segment
LID	Low Impact Development
MCM	Minimum Control Measure
MEP	Maximum Extent Possible
MOS	Margin of Safety
MS4	Municipal Separate Storm Sewer System
NPDES	National Pollution Discharge Elimination System
NOI	Notice of Intent
SCM	Stormwater Control Measure
SDRC	Site Development Review Committee
SOP	Standard Operating Procedure
SSO	Sanitary Sewer Overflow
SWAW	Solid Waste Assessment Worker
SWMP	Stormwater Management Program
SWPPP	Stormwater Pollution Prevention Program
TCEQ	Texas Commission on Environmental Quality
TMDL	Total Maximum Daily Load
TPDES	Texas Pollution Prevention System
UST	Underground Storage Tank
WLA	Waste Load Allocation
WWTP	Wastewater Treatment Plant

Introduction

Regulatory Requirements

The 1972 amendments to the Federal Water Pollution Control Act, later referred to as the Clean Water Act (CWA), prohibited the discharge of any pollutant to navigable waters of the U.S. from a point source unless the discharge was authorized by a National Pollutant Discharge Elimination System (NPDES) permit. The Clean Water Act establishes environmental programs, including the NPDES program, to protect the Nation's waters and directs the U.S. Environmental Protection Agency (EPA) to issue rules on how to implement this law. Under the NPDES program, a municipal stormwater plan was developed in two phases.

Phase I of the EPA municipal stormwater program was promulgated in 1990 under the authority of the Clean Water Act. Phase I relied on NPDES permit coverage to address stormwater runoff from medium and large municipal separate storm sewer systems (MS4s), serving populations of 100,000 and greater.

The Stormwater Phase II rule, promulgated December 8, 1999, to the Texas Commission on Environmental Quality (TCEQ), was the next step in the EPA's efforts to preserve, protect, and improve the nation's water resources from polluted stormwater runoff. TCEQ reissued the Texas Pollutant Discharge Elimination System's MS4 General Permit TXR040000 on August 14, 2024. The newly published permit categorizes MS4 operators into five (5) levels (Levels 1, 2a, 2b, 3, 4, and 5) based on the population data from the 2020 Decennial Census, collected by the United States Census Bureau. The City of Bryan (City) is defined as a Phase II, Level 3, Small MS4 operator, serving a population between 40,000 and 100,000. The intent of the MS4 permit is to implement programs and practices to control polluted stormwater runoff. This program requires that the City:

- reduces the discharge of pollutants to the maximum extent practicable (MEP);
- protects water quality;
- satisfies the appropriate water quality requirements of the Clean Water Act; and
- manages stormwater quality activities through a Stormwater Management Program (SWMP).

Stormwater Management Program

The SWMP provides an in-depth description of specific, pollution-reducing actions to be achieved over a five-year period. The specific activities to be implemented are labeled as best management practices (BMPs). The SWMP sets clear and concise measurable goals, while providing an implementation schedule for each BMP. Various BMPs were developed for each of the six (6) minimum control measures (MCMs) required to be

addressed by the Phase II Small MS4 regulations.

1. Public Education and Outreach
2. Public Involvement and Participation
3. Illicit Discharge Detection and Elimination
4. Construction Site Stormwater Runoff Control
5. Post-Construction Stormwater Management in New Development and Redevelopment
6. Pollution Prevention and Good Housekeeping for Municipal Operations.

This SWMP replaces and supersedes any and all previous SWMPs developed for the City of Bryan.

Program Overview

Background

The City of Bryan, Texas, seat of Brazos County, is centrally located between Austin and Houston. The City was incorporated in 1871 and the original square-mile town site now consists of more than 54.2 square miles. As of 2024, Bryan has an estimated population of 90,441. The community is home to Texas A&M University's Health and Science Center, RELLIS Campus, and Blinn College, which have a combined population of over 90,000 students. The City is bordered on the north, east and west by unincorporated areas of Brazos County and on the south by the City of College Station and Texas A&M University's main campus. The government, education, manufacturing, and healthcare sectors are the largest employers in the City.

Bryan is a home-rule city that operates under the council-manager form of government. The seven-member city council consists of a mayor and six councilmembers, with one councilmember elected at-large and the other five elected from single-member districts. The mayor and councilmembers are elected for alternating four-year terms with eight-year term limits. The City Manager is responsible for developing and implementing policies established by the City Council, recommending the budget for accomplishing work of the city, enforcing laws and ordinances, and recommending improvements to the city's operations. The City provides the full range of municipal services established by charter and state law. These services include police, fire and emergency medical services, parks and recreational facilities and programs, library services, street maintenance and construction, public improvements, general administrative services, and electrical (Bryan Texas Utilities), water, sewer, and solid waste systems.

SWMP Development Process

The unique hydrology and water quality concerns of the City have been considered in developing this Stormwater Management Program. In preparing the program, the City's Development Services Department conducted stakeholder meetings with several city personnel to discuss the various activities with potential stormwater impacts. Several departments have been identified as having potential impacts, including: Development Services, Code Enforcement, Communications & Marketing, Coulter Airfield, Engineering Services, Environmental Services, Fleet, Facilities, Fire, Parks & Recreation, Police, Streets & Drainage, Warehouse, Water Services, and Bryan Texas Utilities.

Public Review of SWMP

In accordance with *MS4 General Permit TXR040000*, this SWMP will be available for public review on the City's website at https://bryantx.gov/stormwater.

Legal Authority and Annual Reporting Requirements

The City has established legal authority to carry out all aspects of the SWMP. Ordinances and other regulatory mechanisms that provide the legal authority necessary to implement and enforce the requirements of the permit, include, but are not limited to, the following sections of the Bryan Code of Ordinances:

Chapter 10 – Animals

Chapter 14 – Buildings and Building Regulations

Chapter 46 – Stormwater Management

Chapter 50 – Health and Safety

Chapter 62 – Land and Site Development

Chapter 78 – Natural Resources

Chapter 102 – Solid Waste

Chapter 106 – Streets, Sidewalks and Other Public Places

Chapter 110 – Subdivision

Chapter 122 – Utilities

Chapter 130 – Zoning

The above-referenced chapters of the City's Code of Ordinances provide the City the legal authority to prohibit illicit discharges, connections, and illegal dumping; respond to and contain releases; require compliance with ordinances, regulatory mechanisms, permits, contracts, and orders; require installation, implementation, and maintenance of control measures; receive and collect information regarding stormwater; to enter and inspect private property, facilities, equipment, practices and operations related to stormwater discharges; respond to non-compliant BMPs; to assess penalties; and to enter into interagency or inter-local agreements as necessary.

The City will track all BMP activities, results, and changes to the SWMP through an annual report that will be submitted to TCEQ within ninety (90) days of the end of each permit year, as represented in the schedule below. To ensure the City maintains compliance with the General Permit conditions, the annual report will include all factors required by the General Permit, including the status of the compliance with permit conditions, assessments of BMPs, and any changes to the SWMP.

Permit Year	Reporting Period	Annual Report Submittal
Year 1	January 1, 2025 – December 31, 2025	March 31, 2026
Year 2	January 1, 2026 – December 31, 2026	March 31, 2027
Year 3	January 1, 2027 – December 31, 2027	March 31, 2028
Year 4	January 1, 2028 – December 31, 2028	March 31, 2029
Year 5	January 1, 2029 – December 31, 2029	March 31, 2030

Impaired Water Bodies

Objective

The focus of this section is to minimize further impact to an impaired water body through public education, defect identification and correction for sewer and drainage utilities, and enforcement for illicit discharges and illegal dumping. Every two years in even-numbered years, the TCEQ updates its "303(d) List" which identifies impaired water bodies that do not meet requirements for implementation of water quality standards but are suitable for measurement by maximum daily load.

Total Maximum Daily Load

A Total Maximum Daily Load (TMDL) is approved for the Carters Creek Watershed for bacteria impairment. The TMDL applies to Segments 1209C (Carters Creek), 1209D (Country Club Branch), and 1209L (Burton Creek). A TMDL is an estimate of the allowable pollutant load that a water body can accept and still be in compliance with the water quality standards for the designated use. The TMDL for the Carters Creek Watershed was approved by EPA on September 27, 2012. The corresponding I-Plan was approved by TCEQ on August 22, 2012.

Waste loading allocations outlined within the I-Plan have been used to satisfy benchmarking requirements of the General Permit. A summary of allocations adopted by the I-Plan are referenced below:

TMDL Allocation Summary for Impaired Creeks located in Bryan, TX

Segment	Stream Name	TMDL	MOS	WLA_{WWTP}	WLA_{SW}	LA_{SEG}	LA_{TL}	LA Total	Future Growth
1209C	Carters Creek	8.146E+11	3.074E+10	4.736E+10	2.698E+11	2.592E+11	1.999E+11	4.590E+11	7.6245E+09
1209D	Country Club Branch	14.38E+10	2.746E+08	0	5.217E+09	0	8.890E+09	8.890E+09	0
1209L	Burton Creek	199.9E+11	8.428E+09	3.625E+10	116.7E+11	1.409E+09	3.131E+10	3.272E+10	5.785E+09

Elements addressing water quality monitoring, infrastructure maintenance and operation, surface water runoff, and development safeguards outlined within the I-Plan are written into the SWMP to ensure continuity for reducing *E. coli* loading among both documents (I-Plan and SWMP).

The TMDL Allocation Summary table will serve as the ultimate measure of program success. Measurable milestones and implementation schedules from the I-Plan will be used to steer monitoring efforts and measure program success.

Indicators of success regarding measures relating to *E. coli* will include: (1) number of sources identified or eliminated, (2) decrease in number of illegal dumping cases, (3) increase in reporting of illegal dumping, (4) number of educational opportunities conducted, (5) reduction in sanitary sewer overflows, and (6) increase in illegal discharge detection through dry screening.

Impaired Water Bodies

The Texas Integrated Report Index of Water Quality Impairments identifies all water bodies with one or more impairments. The index is divided into two main categories:

- Category 4: Impairments that are not suitable for a TMDL or for which a TMDL has already been approved; and
- Category 5: Impairments which may be suitable for development of a TMDL (303d List)

City of Bryan Impaired Stream Segments – Category 4

Segment No.	Classification	Segment Name	Impairment
1209B	4a	Finfeather Lake	Bacteria (*E. coli*)
1209D	4a	Country Club Branch	Bacteria (*E. coli*)
1209L	4a	Burton Creek	Bacteria (*E. coli*)

*see Total Maximum Daily Load

City of Bryan Impaired Stream Segments – Category 5

Segment No.	Classification	Segment Name	Impairment
1209A	5c	Country Club Lake	Toxicity in Sediment
1209B	5c	Fin Feather Lake	Toxicity in Sediment
1242B	5b	Cottonwood Branch	Bacteria (*E. coli*)
1242C	5b	Still Creek	Bacteria (*E. coli*)
1242D	5b	Thompsons Creek	Bacteria (*E. coli*) & DO

Segment No. 1209A and 1209B: Segment No. 1209A and 1209B are impaired for toxicity in associated with operation and closure of Elf Atochem. This facility has been demolished with ongoing remediation efforts for arsenic contaminated sources of soil and groundwater performed (Industrial Hazardous Waste Registration # 31695). Remedial action has been performed within Segment No. 1209A and 1209B to return sediment concentrations for arsenic to a level equivalent or below background. Avoiding disturbance of the soil within these stream segments presents the best course of action in offsetting downstream impact(s).

Indicators of success regarding measures relating to toxicity in sediment will include: (1) number of site plans reviewed that directly impact sediment within the water bodies, (2) number of construction projects performed that directly impact sediment within the water bodies, and (3) number of educational opportunities conducted addressing water quality issues relating to the SMWP.

Segment No. 1242B, 1242C, and 1242D: The same measurable milestones and implementation schedules as used for monitoring and control of *E. coli* for the City's TMDL-approved stream segments 1209L (Burton Creek) and 1209D (Country Club Branch) will be adopted for these stream segments since all segments share a common impairment – Bacteria (*E. coli*). Taking this action is expected to yield greater efficiency through uniformity in monitoring and control of *E. coli* while minimizing confusion for staff and the public.

Indicators of success regarding measures relating to *E. coli* will include: (1) number of sources identified or eliminated, (2) decrease in number of illegal dumping cases, (3) increase in reporting of illegal dumping, (4) number of educational opportunities conducted, (5) reduction in sanitary sewer overflows, and (6) increase in illegal discharge detection through dry screening

Endangered Species

Review of TCEQ's *Procedures to Implement the Texas Surface Water Quality Standards, June 2012 (TCEQ RG-194)* identifies the Houston Toad as an endangered or threatened species for stream segment numbers 1209 (Leon County) and 1242 (Burleson County). Brazos County is not identified as a county of concern for these stream segments in TCEQ's current 2012 Implementation Procedures. The City of Bryan's MS4 discharges to stream segments number 1209 and 1242 downstream of Burleson County and Leon County and will not cause impact to water quality or habitat associated with the Houston Toad upstream of the City of Bryan.

MCM 1: Public Education and Outreach

Objective

The City of Bryan's outreach efforts aim to equip residents—including homeowners, renters, business owners, students, and City staff—with the knowledge and tools to reduce pollutants and improve water quality.

Key Focus Areas

1. **Reducing E. coli contamination** by educating residents on responsible pet waste disposal, proper sewer use, and best practices for fats, oils, and grease (FOG) disposal.

2. **Minimizing organic material in storm drains** by promoting responsible lawn care, landscaping, and vehicle maintenance.

3. **Expanding and maintaining outreach efforts** from previous permit cycles to build community awareness and engagement.

Everyday activities such as lawn care, vehicle maintenance, and home improvements can contribute to water pollution if not done properly. To address this, the city will focus on raising awareness about:

- Proper disposal of grass clippings and leaf litter.
- Responsible use, and disposal, of fertilizers and pesticides.
- Litter prevention and trash containment, including the environmental impact of balloon releases.
- The dangers of illegal dumping and improper disposal of household hazardous wastes.
- Pet waste management.
- Proper handling and disposal of oil, grease, and other automotive fluids.
- Ways to reduce water runoff.
- Education on how storm drains lead directly to local rivers and waterways without treatment

Outreach Methods and Implementation

The City will use multiple communication channels to strategically deliver content that is seasonally appropriate and tailored to the specific audience engaging with that platform:

- **City Website:** The dedication stormwater management and education webpage (bryantx.gov/stormwater) provides resources, best practices, updates, and required documentation. It will be monitored, maintained, and updated as needed to ensure accurate information.

- **Social Media Messaging:** Timely posts and interactive content will inform and engage audiences on seasonal topics. The city has an active presence on Facebook, Instagram, X, LinkedIn, YouTube, and NextDoor.

- **Local Media Advertising:** Radio, TV, and digital advertisements will reinforce key messages and expand audience reach.

- **Targeted campaign to Bryan Texas Utility customers:** Publish content in Texas Co-Op Power magazine that is mailed to every utility customer and Plug-In newsletter that is inserted into all paper utility bills.

- **Bi-weekly E-Newsletter:** Regular articles will highlight best practices, public participation opportunities, and educational messages. The newsletter reaches thousands of subscribers including all of the city's homeowner and neighborhood association contacts and media outlets.

Additionally, the City of Bryan will address other relevant topics and utilize in-house communications methods as needed, based on emerging environmental concerns, regulatory changes, or community feedback.

MCM 1: PUBLIC EDUCATION AND OUTREACH			
Activity/BMP	**Implementation**	**Measurable Goals**	**Indicators to Measure Progress**
A. Information on the MS4 operator's website	Biannually review the website to ensure functionality and accuracy.	Maintain a webpage with current and accurate information and working links. ▪ All links shall be checked, and the page shall be updated as necessary at a minimum of once annually. ▪ Must be maintained for the full year, each year.	▪ Biannual webpage reviews. ▪ Number of updates made.
B. Social media posts, social media campaign.	Develop and execute an annual social media content plan.	Post a minimum of four times each year on a minimum of one social media platform. ▪ The message shall address ways attendees can minimize or avoid adverse stormwater impacts or practices to improve the quality of stormwater runoff. ▪ The messages shall be seasonally appropriate. ▪ Must make a minimum of one post per quarter and all quarterly posts must be visible by attendees for the full year, each year.	▪ Number of social media posts per platform. ▪ Social media metrics from related posts (impressions, engagements, etc.)

MCM 1: PUBLIC EDUCATION AND OUTREACH			
Activity/BMP	**Implementation**	**Measurable Goals**	**Indicators to Measure Progress**
C. Media/advertising campaign/public service announcements in areas of high visibility: Billboard/poster; Bus shelter/bench; radio/television/movie theatre; and kiosks.	Develop and execute a media campaign plan consisting of radio, TV, and digital advertising with local outlets.	Develop topics that address activities or pollutants of concern. Advertisement must be active for a minimum of three weeks each year; or must have an estimated public exposure for the duration of the advertising campaign that is equal to twice the population for the small MS4 area (based on the most recent U.S. Census Bureau decennial population value for the small MS4 area).	▪ Number of media/advertising campaigns/public service announcements. ▪ Advertising metrics based on platform/outlet (reach, frequency, impressions, etc. that can be provided from the media outlet)
D. Publish articles in local newspaper or newsletter, may be electronic.	Write and publish articles in the city's, bi-weekly e-newsletter.	Develop article topics that are group specific and address activities or pollutants of concern at a seasonally appropriate time. A minimum of two articles must be published or emailed to target audience groups each year.	▪ Number of articles published. ▪ E-newsletter metrics (open and click thru rates).
E. Targeted education campaign via mail, email, or in person.	Target utility bill customers with Texas Co-Op Power Magazine and Plug-In newsletter articles.	Minimum of one campaign annually distributed to at least 75% of the intended audience, or with a specific event advertised to at least 75% of the intended audience. Develop and implement a tracking system to estimate what percentage of the	▪ Number of articles published. ▪ Number of customers reached.

MCM 1: PUBLIC EDUCATION AND OUTREACH			
Activity/BMP	**Implementation**	**Measurable Goals**	**Indicators to Measure Progress**
		intended audience is reached for determining BMP effectiveness. (Examples: Sediment control with small building permit; leaf litter email during street sweeping season, or education brochure to all businesses conducting certain activity)	

MCM 2: Public Involvement and Participation

Objective

Public participation is a key component of effective stormwater management, and the City will engage residents in stormwater-related activities to encourage protection, education, training, and enhancement of stormwater quality.

The City works with volunteer organizations such as The Big Event, Texas Trash Off, and Aggie Replant to support cleanup events, habitat restoration projects, and tree planting efforts.

Staff will host educational booths at relevant, public events, such as the Open House and First Fridays; and partner with experts to host training opportunities for homeowners.

Residents can review and comment on the SWMP and annual reports, which are available at bryantx.gov/stormwater. The City values public input and welcomes suggestions for enhancing stormwater education and outreach.

MCM 2: PUBLIC INVOLVEMENT AND PARTICIPATION			
Activity/BMP	**Implementation**	**Measurable Goals**	**Indicators to Measure Progress**
A. Stream/lake or watershed clean-up events; litter/trash clean-up events such as Texas Stream Team, Adopt-A-Highway, Adopt-A-Stream, etc.	Host or support, and promote, clean-up events.	Host or support at a minimum two events annually. To be considered an event, the land area cleaned must be a minimum of: ▪ two acres ▪ 400 yards of steam/streambank/riparian area, or ▪ two miles of roadside ▪ These may be combined (such as one acre of land and 200 yards of stream).	▪ Number of events hosted.
B. Habitat improvement; Tree planting; Invasive Vegetation removal; Stream restoration.	Host or support, and promote, habitat improvement and tree planting events.	Host or support at a minimum two events annually. To be considered an event, the project must be a minimum of 0.5 acres or 25 yards. An event may take place in streams, parks, areas adjacent to public waterways, or other green space. An event may be a combination of locations and areas.	▪ Number of events hosted or supported.

MCM 2: PUBLIC INVOLVEMENT AND PARTICIPATION			
Activity/BMP	**Implementation**	**Measurable Goals**	**Indicators to Measure Progress**
C. Hold events to train residents, or work a project for homeowner associations (HOAs), or other public groups to cover stormwater topics such as: Building rain barrels; Fertilizer application training; Rain garden/bio retention creation or maintenance; How to recognize illicit discharge activities and communicate observations to appropriate MS4 staff.	Provide or support, and promote, training opportunities and related project efforts.	Provide or support at minimum one project or training annually.	▪ Number of projects or training provided or supported.
D. Educational display/booth at a school, public event, or similar event to provide information or displays that work to improve public understanding of issues related to water quality.	Setup and staff an educational booth or display at a public event.	Provide or support one booth or display at minimum annually. The booth or display must be staffed during the time which the event is open to the public.	▪ Number of events with booths or displays.

MCM 3. Illicit Discharge Detection and Elimination

Objective

The City's Illicit Discharge Detection and Elimination (IDDE) program outlines measures to detect and eliminate illicit discharges to the storm sewer system, detect and eliminate sanitary sewer overflows, promote household hazardous waste collection, and provide response to illegal dumping and citizen requests.

MS4 Mapping

A map of the storm sewer system, including the location of all outfalls and the names of tributaries conveying surface water to each outfall is maintained using GIS. Maintaining an updated and accurate map of the MS4 is critical for system operations, maintenance, and emergency response. ESRI GIS serves as the backbone of the City's mapping efforts for utilities, rights-of-way, property, and infrastructure. These attributes are viewable through GIS. Regular and ongoing updates are made to GIS to reflect additions, subtractions, etc. in attributes and managed data.

Employee Training

Training of employees involved in implementing pollution prevention and housekeeping establishes an educated work force to protect stormwater quality. A mixture of department-specific and/or universal best practices will be used to train field staff. Training will be performed annually. The record of training and attendance is recorded.

Public Reporting of Illicit Discharges and Spills

Protection of stormwater quality is a shared partnership between the municipality and its citizens. The City maintains a web-based work order request dubbed "Help Bryan" to allow citizens the ability to report stormwater related issues and concerns. Citizens may also report concerns by calling the Public Works Call Center (M-F, 7:30am – 5pm) and Bryan Texas Utilities Call Center (afterhours and weekends). Complaints are documented using a work order or other management approach. Complaints are converted to work orders and/or inspection orders for investigation and closure.

Source Investigation and Elimination

Illicit discharge detection will be accomplished by visually monitoring culvert outfalls, inlet boxes, surface water flow, and drainage of open channels for indicators of illicit discharges or water pollution. In response to an illicit discharge, the responding department will take appropriate action to notify the responsible party and take action where needed to correct the discharge and arrange mitigation (if required). Multiple departments share enforcement responsibility for stormwater ordinance violations.

Investigations

The City has prepared a general inspection procedures for illicit discharges and illegal dumping to the MS4. These procedures were selected to promote consistency for inspections. Information from inspections are documented and inputted into the responding department's historian (cases, work orders, job tickets, etc.) and reported as part of the City's SWMP Annual Report.

MCM 3: Illicit Discharge and Elimination			
Activity/BMP	**Implementation/Frequency**	**Measurable Goals**	**Indicators to Measure Progress**
A. Maintain a current and accurate MS4 map	By December 31st of each year, evaluate accuracy of MS4 map (outfalls, facilities listing, and priority areas).	▪ Review and update, as necessary at least one time annually to include features which have been added, removed, or changed.	▪ MS4 map updated ▪ Number of outfalls ▪ Number of High Priority areas ▪ Number of facilities ▪ Number of structural controls
B. Conduct training for all the permittee's field staff	▪ By December 31st of each year, complete training of field staff. ▪ By December 31st of each year, review field staff training materials and training program.	▪ Conduct a minimum of one training annually for 100% of the MS4 field staff that come into contact with or otherwise observe an illicit discharge, illegal dumping, or illicit connection to the small MS4 as part of their normal job responsibilities.	▪ Number of employee training events ▪ Number of employees trained

MCM 3: Illicit Discharge and Elimination			
Activity/BMP	**Implementation/Frequency**	**Measurable Goals**	**Indicators to Measure Progress**
C. Maintain and publish a public reporting method for the public to report illicit discharges, illegal dumping, or water quality impacts associated with discharges into or from the small MS4 such as a reporting hotline, online form, or other similar mechanism	▪ By December 31st of each year, generate report of citizen reported complaints impacting stormwater. ▪ By December 31st of each year, release a minimum of two advisements for citizen reporting.	▪ Maintain a minimum of one public reporting mechanism 100% of the time during the permit term. ▪ Publicize the public reporting mechanism a minimum of two times annually in a method designated to reach at least 75% of the intended audience. ▪ Publicize a reporting mechanism on city's website 100% of the time during the permit term.	▪ Citizen reporting tool loaded to website ▪ SWMP and Annual Reports loaded to website ▪ Number of citizen complaints ▪ Number of educational opportunities conducted
D. Develop and maintain procedures for responding to illicit discharges, illegal dumping, and spills	By December 31st of each year, review inspection procedures.	▪ Review and update the procedure at least one time annually to address changes and make improvements to the established procedures where applicable.	▪ Annual review completed
E. Source investigation and elimination of illicit discharges and illegal dumping	▪ By December 31st each year, generate case summary report ▪ Quarterly, reconcile work order system with case log	▪ Respond to 100% of known illicit discharges and illegal dumping incidents each year to investigate sources. ▪ Respond to 100% of "high priority" discharges each year, such as sanitary sewer discharges within 24 hours.	▪ Number of illicit discharge sources identified ▪ Number of illicit discharge sources corrected ▪ Number and types of illicit discharge cases

MCM 3: Illicit Discharge and Elimination			
Activity/BMP	**Implementation/Frequency**	**Measurable Goals**	**Indicators to Measure Progress**
		▪ For 100% of known illicit discharges or illegal dumping incidents where the small MS4 does not have jurisdiction, notify the adjacent MS4 operator or the applicable TCEQ regional office throughout the permit term.	▪ Miles of sanitary sewer pipe cleaned ▪ Number of sewer sub-basins inspected using smoke testing ▪ Number of grease traps inspected ▪ Number of grit traps inspected ▪ Number of construction sites inspected
F. Corrective action to eliminate illicit discharges and illegal dumping	Continuation of existing process.	▪ For 100% of illicit discharges or illegal dumping where a source has been determined, notify the responsible party of the problem within 24-hours.	▪ Number of illicit discharge sources identified ▪ Number of illicit discharge sources corrected ▪ Number and types of illicit discharge cases
G. Inspection procedures establishment	By December 31st of each year, review inspection procedures and document review.	▪ Review and update the procedures at least one time annually to address changes and make improvements to the established procedures where applicable.	▪ Annual procedure review
H. Inspections in response to complaints	▪ Continuation of existing process. ▪ By December 31st each year, develop case	▪ Conduct inspections in response to 100% of complaints each year according to the established	▪ Number of citizen complaints reported ▪ Number of cases worked

MCM 3: Illicit Discharge and Elimination			
Activity/BMP	**Implementation/Frequency**	**Measurable Goals**	**Indicators to Measure Progress**
	summary table. ▪ Weekly, reconcile work order system with case log.	procedures. ▪ Conduct follow up inspections in 100% of cases each year where necessary as described in the established procedures.	
I. Conduct follow-up investigations or field screenings when notified that a discharge has been eliminated	By December 31st of each year, conduct field screening for citizen complaints.	▪ Conduct follow-up investigations or field screening in response to 100% of notifications each year. ▪ Complete the follow-up investigation within five business days, on average.	▪ Number of citizen complaints reported ▪ Number of cases worked ▪ Number of field screening events

MCM 4. Construction Site Stormwater Runoff Control

Objective

Construction sites are significant sources of pollutant discharges, with sediment being the most widespread concern for water bodies. Sediment quickly fills water bodies, can require dredging, and destroys aquatic habitats. The City continue to implement, and enforce its construction stormwater program requiring operators of construction activities one (1) acre or greater to select, install, and maintain stormwater control measures utilized to prevent illicit discharges to the MEP. This SWMP is written to be in full compliance with all parameters listed in the *TPDES TXR040000 MS4 General Permit*, as well as the *TXR150000 Construction General Permit*, ensuring site operators implement the following:

1. Site-specific Stormwater Pollution Prevention Plans (SWPPPs);

2. Soil stabilization measures;

3. Best management practices (BMPs) to control pollutants, sediment and erosion, as well as equipment and vehicle washing;

4. Limiting exposure of building materials, products, waste, trash, landscape materials, fertilizers, pesticides, herbicides, detergents, and sanitary waste to rain events;

5. Minimizing the discharge of pollutants from spills and leaks; and

6. Prohibiting the following discharges:

    a. Wastewater from washout of concrete and wastewater from water well drilling operations, unless managed by an appropriate control;

    b. Wastewater from washout and cleanout of stucco, paint, from release oils, and other construction materials;

    c. Fuels, oils, or other pollutants used in vehicle and equipment operation and maintenance;

    d. Soaps or solvents used in vehicle and equipment washing; and

    e. Discharges from dewatering activities, including discharges from dewatering of trenches and excavations, unless managed by appropriate BMPs.

The City will ensure the above measures are met by continuing to follow internal procedures for construction site plan review considering water quality impacts, inspections and enforcement measures to the extent allowable under state and local laws, receipt and consideration of information submitted by the public, as well as MS4 staff training.

MCM 4: Construction Site Stormwater Runoff Control			
Activity/BMP	**Implementation**	**Measurable Goals**	**Indicators to Measure Progress**
A. Develop and maintain an ordinance or other regulatory mechanism requiring operators of small and large construction activities to select, install, implement, and maintain stormwater control measures that prevent illicit discharges to the MEP.	By December 31st of each year, review ordinances or regulatory mechanisms.	Review and update ordinances or other regulatory mechanism as necessary at least one time annually, to address changes and make improvements where applicable.	▪ Annual review completed. ▪ Number of modifications to ordinances or regulatory mechanisms completed.
B. Develop and maintain an ordinance or other regulatory mechanism to prohibit discharges.	By December 31st of each year, review ordinances or regulatory mechanisms.	Review and update ordinances or other regulatory mechanism, as necessary at least one time annually, to address changes and make improvements where applicable.	▪ Annual review completed. ▪ Number of modifications to ordinances or regulatory mechanisms completed.
C. Maintain and implement site plan review procedures that describe which plans will be reviewed as well as when an operator may begin construction.	By December 31st of each year, review procedures.	Review and update site plan review procedures at least one time annually, to address changes and make improvements to the established procedures where applicable.	▪ Annual review completed. ▪ Number of modifications to established procedures completed.
D. Develop and implement procedures for inspecting large and small construction projects.	By December 31st of each year, review procedures for inspecting construction projects.	Review and update inspection procedures at least one time annually to address changes and make improvements to the established procedures where applicable.	▪ Annual review completed. ▪ Number of modifications to established procedures completed.

MCM 4: Construction Site Stormwater Runoff Control			
Activity/BMP	**Implementation**	**Measurable Goals**	**Indicators to Measure Progress**
E. Conduct construction site inspections,	▪ Engineering inspectors will inspect capital improvement projects as outlined by the inspection procedures. ▪ Engineering inspectors will inspect subdivision development projects until a subdivision plat is recorded, as outlined by the procedures. ▪ Building inspectors will inspect all other development projects not inspected by engineering inspectors, as outlined by the procedures.	▪ Conduct inspections at 80% of active construction sites annually according to the established procedures. ▪ Each year, conduct follow up inspections in 100% of cases where necessary as described in the established procedures.	▪ Number of capital improvement project active construction sites. ▪ Number of capital improvement project inspections completed. ▪ Percentage of active capital improvement project construction site inspections completed. ▪ Number of subdivision development active construction sites. ▪ Number of subdivision development construction site inspections completed. ▪ Number of active construction sites that are neither capital improvement project nor subdivision development. ▪ Number of active construction site inspections completed for projects that that are neither capital

MCM 4: Construction Site Stormwater Runoff Control			
Activity/BMP	**Implementation**	**Measurable Goals**	**Indicators to Measure Progress**
			improvement project nor subdivision development.
F. Develop, implement, and maintain procedures for receipt and consideration of information submitted by the public.	By December 31st of each year, review procedures.	▪ Review and update procedures for the receipt and consideration of information submitted by the public at least one time annually to address changes and make improvements to the established procedures where applicable. ▪ Maintain one webpage, hotline, or similar method for receipt of information submitted by the public throughout the permit term.	▪ Annual review completed. ▪ Number of procedure updates completed. ▪ Number of changes made to the webpage or hotline.
G. Conduct training for all the MS4 staff whose primary job duties are related to implementing the construction stormwater program.	▪ By December 31st of each year, have 100% of MS4 staff trained, including Engineers, Engineering Inspectors, Building Inspectors, and Building Plan Examiners.	▪ Conduct a minimum of one training annually for 100% of MS4 staff whose primary job duties are related to implementing the construction stormwater program.	▪ Number of MS4 staff. ▪ Percentage of MS4 staff who completed training.
H. Develop and maintain a Construction Site inventory.	▪ Within one (1) year of obtaining authorization under the general permit,	▪ Maintain an annual inventory of 100% of TPDES permitted active public and private construction sites in the small MS4 area, that result in	▪ Number of public construction sites inventoried. ▪ Number of private

MCM 4: Construction Site Stormwater Runoff Control			
Activity/BMP	**Implementation**	**Measurable Goals**	**Indicators to Measure Progress**
	have developed and maintain an up-to-date inventory of all TPDES permitted active public and private construction sites.	a total land disturbance of one or more acres or that result in a total land disturbance of less than one acre if part of a larger common plan or development or sale.	construction sites inventoried.

MCM 5. Post-Construction Stormwater Management in New Development and Redevelopment

Objective

Stormwater discharges from new private and public development, as well as redevelopment sites have the potential to degrade water quality from soil disturbing practices associated with construction activities that discharge into the MS4, whom disturb one acre or more (or part of a common plan of development). Stormwater control measures addressing post-construction discharges will subsequently ensure long-term water quality after construction practices have ceased.

The City has an existing program to reduce the discharge of pollutants into the MS4 from construction sites. The City also has existing processes in place for private and public development/redevelopment projects to assure site stabilization has occurred at the end of the construction period. As part of the acceptance, or punchlist inspection phase of the project, outstanding stabilization measures are noted for the contractor. Construction sites are re-inspected one (1) year after acceptance as part of a warranty inspection, and any remaining control measures, e.g., such as silt fencing that has not been removed, will be addressed at that time.

The City will continue to follow practices from the previous program, including, requiring owners and operators of new development and redeveloped sites to design, install, implement, and maintain a combination of structural and non-structural BMPs appropriate for the community and protects water quality. In addition, the City will fine-tune its procedures to document and maintain records, enforcement actions, as well as long-term operation and maintenance of structural controls.

MCM 5: POST CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT			
Activity/BMP	**Implementation**	**Measurable Goals**	**Indicators to Measure Progress**
A. Develop and maintain an ordinance or other regulatory mechanism.	By December 31st of each year, review ordinances and propose changes to address any deficiencies.	Review and update the ordinance or other regulatory mechanism at least one time during the permit term to address changes and make improvements to the ordinance where applicable.	▪ Annual review completed. ▪ Number of modifications to ordinances or regulatory mechanisms completed.
B. Document and maintain records of enforcement actions and make them available for review by the TCEQ.	Develop and maintain a recordkeeping system using the City's online permitting software and that includes an action log (phone calls, site visits, enforcement letters, etc.).	▪ Maintain records of 100% of enforcement actions taken each year. ▪ Make 100% of enforcement records available to TCEQ for review within 24 hours of request. ▪ Perform inspections for BMPs, TCEQ construction general permit compliance and the City's ordinances.	▪ Recordkeeping system developed and maintained. ▪ Number of enforcement records requested by TCEQ. ▪ Percentage of enforcement records made available to TCEQ for review within 24 hours. ▪ Number of complaint-driven stormwater investigations conducted.
C. Ensure the long-term operation and maintenance	▪ Develop an SOP for Public Works to	▪ Maintain 100% of stormwater control measures each year where	▪ Number of maintenance plans

MCM 5: POST CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT			
Activity/BMP	**Implementation**	**Measurable Goals**	**Indicators to Measure Progress**
of structural stormwater control measures installed.	obtain progress indicators. ▪ Through City's Site Development Review process request a copy of maintenance plans showing owner's obligation to maintain facilities as noted in measurable goals.	the MS4 operator is responsible for maintenance. ▪ Each year, require 100% of the owners or operators of any new development or redeveloped sites to develop and implement a maintenance plan addressing maintenance requirement for any structural control measures installed on site. ▪ Require the site owner or operators to maintain documentation onsite of 100% of the maintenance performed and made available for review by the small MS4 operator or TCEQ within 24 hours of the request.	received and archived. ▪ Number of inspections by Streets and Drainage Department (inlets, ponds, streams, outfalls, pipes, etc.). ▪ Number of detention ponds inspected. ▪ Number of outfall structures inspected. ▪ Number of work orders performed by Streets and Drainage Department.

MCM 6. Pollution Prevention and Good Housekeeping for Municipal Operations.

Objective

The City's Pollution Prevention and Good Housekeeping Program focuses on processes to reduce pollutant runoff from municipal operations. This program provides for waste management, use of pesticides, herbicides, and fertilizers, spill prevent and control, and day-to-day activities performed by City staff which have the ability to contribute pollutants onto stormwater.

Municipal Facilities and Control Inventory

This effort centers on developing an inventory of municipal facilities and installed stormwater controls. A listing of "High Priority" facilities is outlined below. A conclusive list of all facilities and controls are identified in the MS4 map and tracked using ESRI GIS (Geographic Information System).

City-Owned High Priority Facilities

Facility	Authorizations/Permits	Activity
Burton Creek WWTP	TPDES:TX0022616/SW:TXR05Q529	Wastewater Treatment
Still Creek WWTP	TPDES:TX0025071/SW:TXR05Q530	Wastewater Treatment
Thompsons Creek WWTP	TPDES:TX0128554/SW:TXR05EY16	Wastewater Treatment
Fountain Street Fuel Island	PST:83715/SPCC Rule	Fuel Island - AST
Coulter Airfield	PST:21582/SW:TXR05DS44	General Aviation
Sue Haswell Pool	N/A	Bulk Chemical Storage
Bryan Aquatic Center	N/A	Bulk Chemical Storage
Henderson Harbor	N/A	Bulk Chemical Storage
Sadie Thomas Pool	N/A	Bulk Chemical Storage
Dansby Power Plant	Air: 82/TPDES:TX0073954/SW:TXR159307	Power Generation
BTU Warehouse/Yard	N/A	Materials Yard
	N/A	Vehicle Washing
Municipal Service Center	IHW:66385/Used Oil:C86222	Vehicle Maintenance
	Tires:6200107/Used Oil:C86222	Recycling Center
	PST:27111	Fuel Island - UST
	N/A	Materials Yard
	N/A	Vehicle Washing

Training and Education

Training of employees involved in implementing pollution prevention and housekeeping establishes an educated work force to protect stormwater quality. A mixture of departmental-specific and/or universal best practices will be used to train field staff. Training will be performed annually. The record of training and attendance recorded.

Contractor Requirements and Oversight

Contractor oversight is practiced by contract managers to ensure best management practices are fully implemented by contractors in the jobs they perform. This may include contractually obligating contractors to comply with SOPs and other stormwater provisions, training sessions, and/or performance inspections. Contractor oversight procedures must be documented and made available upon request by TCEQ.

Municipal Operation and Maintenance Activities

Standardized procedures are drafted to minimize stormwater impact from street and sidewalk repair, right-of-way mowing, and cold weather operations. Control measures for these activities is a balanced approach of written plans designed to protect water quality and visual inspections of performed work to confirm the plans and/or job function meet the desired goal. SOPs are maintained for the above-mentioned activities and identify pollutants of concern that may be expected to come into contact with stormwater. A minimum of one annual inspection is performed per above-listed job type and its written procedure to verify general performance and areas for improvement.

Structural Control Maintenance

Examples of structural controls include wet ponds, reinforced soil retraining systems, gabions, and sediment basins. Maintenance of install controls is key in ensuring the effectiveness of the installed control in reducing sediment loading and other impacts to drainage systems and waterways. This measure establishes an inspection procedures and frequency for structural controls.

Storm Sewer Operation and Maintenance

Street sweeping is performed to limit litter and dust/dirt along public streets, public parking lots, and rights-of-way from being washed into the storm drain. Road debris from traffic flow can add to sediment loading of the storm drain if not properly managed. Activities performed in this measure include a street sweeping cleaning schedule and frequency, litter collection, and provisions for waste handling and disposal.

Mapping of Facilities

Maintaining an updated and accurate map of the MS4 is critical for system operations, maintenance, and emergency response. ESRI GIS serves as the backbone of the City’s

mapping efforts for utilities, rights-of-way, property, and infrastructure. These attributes are viewable through GIS. Regular and ongoing updates are made to GIS to reflect additions, subtractions, etc. in attributes and managed data.

Facility Assessment and Facility-Specific Procedures

Facilities are assessed annually for their ability to contribute pollutants into stormwater. Part of this exercise is to determine high priority facilities. These facilities are ones which have a high probability to contribute pollutants into stormwater based on the activities performed, chemicals stored, and proximity to water bodies. Assessments must be maintained throughout the permit term. Completed assessments must include a listing of findings, identified deficiencies, and corrective actions taken.

Stormwater Controls and Inspections for High Priority Facilities

Facility-specific SOPs and procedures are drafted for facilities classified as “High Priority”. The SOPs and installed controls are evaluated annually to verify general performance and areas for improvement. Completed evaluations and inspections must be documented and made available upon request by TCEQ.

MCM 6: Pollution Prevention & Good Housekeeping for Municipal Operations			
Activity/BMP	**Implementation/Frequency**	**Measurable Goals**	**Indicators to Measure Progress**
A. Permittee-owned facilities and installed controls inventory	By December 31st of each year, update facilities inventory.	▪ Develop and maintain an annual inventory for 100% of the small MS4 owned and operated facilities and installed controls in the small MS4 area. ▪ Review and update the inventory at least one time annually to address changes or additions to the facilities and controls applicable.	▪ Number of City facilities inventoried and mapped ▪ Number of installed controls inventoried and mapped ▪ Annual review completed
B. Training and education	▪ By December 31st of each year, complete training of field staff. ▪ By December 31st of each year, training complete for MS4-applicable contracted service providers.	▪ Conduct a minimum of one training annually for 100% of employees involved in implementing pollution prevention and good housekeeping practices ▪ Ensure training of 100% of applicable contract staff is conducted at least one time annually using contract language or other similar method.	▪ Number of employee training events ▪ Number of employees trained ▪ Number of contracts incorporating stormwater provisions ▪ Number of contractor training events
C. Disposal of waste material	By December 31st of each year, inventory contracts and gate activity for waste disposal.	▪ Ensure that 100% of waste form the MS4 is disposed of in accordance with 30 TAC Chapters 330 and 335, as applicable each year.	▪ Tonnage reports for disposal: Twin Oaks Landfill – City performed waste collection and disposal

MCM 6: Pollution Prevention & Good Housekeeping for Municipal Operations			
Activity/BMP	**Implementation/Frequency**	**Measurable Goals**	**Indicators to Measure Progress**
D. Contractor requirements and oversight	▪ By December 31st of each year, inventory service provider contracts. ▪ By December 31, 2025 and each year after, review service provider contracts for inclusion of stormwater provisions. ▪ By December 31, 2025 and each after, generate inspection summary for contractor performance inspections.	▪ Each year, ensure that 100% of contractors hired by the MS4 to perform maintenance activities on permittee owned facilities is contractually required to comply with all of the stormwater control measures, good housekeeping practices and facility-specific stormwater management operating procedures. ▪ Provide oversight of 100% of contractor activities to ensure that contractors are using appropriate control measures and SOPs each year. ▪ Oversight procedures must be maintained on-site 100% of the time and made available for review by TCEQ within 24 hours of request.	▪ Number of maintenance contracts issued ▪ Number of contracts incorporating stormwater provisions ▪ Number of contractor performance audits performed
E. Assessment of permittee-owned operations	By December 31st of each year, review SOPs and amended where needed.	▪ Evaluate 100% of O&M activities for their potential to discharge pollutants in stormwater annually including but not limited to: ✓ Road and parking lot maintenance, including such areas as pothole repair, pavement marking, sealing, and re-paving.	▪ Number of SOPs developed ▪ Number of High Priority SOPs developed ▪ Number of employee training events ▪ Number of employees trained ▪ Annual review completed

MCM 6: Pollution Prevention & Good Housekeeping for Municipal Operations			
Activity/BMP	**Implementation/Frequency**	**Measurable Goals**	**Indicators to Measure Progress**
		✓ Bridge maintenance, including such areas as re-chipping, grinding, and saw cutting. ✓ Cold weather operations, including plowing, sanding, application of deicing and anti-icing compounds and maintenance of snow disposal areas. ✓ Right-of-way maintenance, including mowing, herbicide and pesticide application, and planting vegetation.	
F. Identify pollutants of concern (POC)	By December 31, 2025 and each year after, develop inventory of POCs for SOP-covered processes and review annually.	▪ Identify pollutants of concern (POC) that could be discharged from all of the O&M activities described in TXR04000 Part IV.D.6(b)(5)b and maintain a list of 100% of the pollutants identified. Including for example, metals: chlorides, hydrocarbons such as benzene, toluene, ethyl benzene and xylenes; sediment, and trash. ▪ Review and update the pollutants of concern list at least one time annually to address changes or additions to the O&M activities where applicable.	▪ Number of SOPs developed with POCs listed ▪ Number of High Priority SOPs developed with POCs listed ▪ Annual review completed

MCM 6: Pollution Prevention & Good Housekeeping for Municipal Operations			
Activity/BMP	**Implementation/Frequency**	**Measurable Goals**	**Indicators to Measure Progress**
G. Pollution prevention measures	By December 31, 2025 and each year after, develop inventory of deicing material and application tracking and complete necessary site improvements to divert stormwater away from chemical deicing storage areas.	▪ Develop and implement a set of pollution prevention measures that will reduce the discharge of pollutants in stormwater from the permittee-owned operations to include: ✓ Place barriers around or divert runoff away from 100% of deicing chemical storage areas to prevent discharge into the surface waters each year. ✓ Track 100% of the application of deicing and ani-icing compounds in the MS4 area and record the amount of compound used in each application annually.	▪ Number of facilities with deicing compounds storage ▪ Number of deicing events ▪ Weight of deicing compounds procured
H. Inspection of pollution prevention measures	By December 31st of each year, develop inventory of facilities with installed pollution prevention measures and inspect installed measures.	▪ At least one time annually, visually inspect 100% of pollution prevention measures implemented at permittee owned facilities to ensure they are working properly. ▪ Develop and maintain written procedures that describe the frequency of inspections and how they will be conducted. ▪ Review and update the inspection procedures at least	▪ Number of facilities inventoried ▪ Number of inspections performed ▪ Annual review completed

MCM 6: Pollution Prevention & Good Housekeeping for Municipal Operations			
Activity/BMP	**Implementation/Frequency**	**Measurable Goals**	**Indicators to Measure Progress**
		one time annually to address changes or additions to the pollution prevention measures. ▪ Maintain a log of 100% of the inspections conducted annually and make the log available for review by the TCEQ within 24 hours of a request.	
I. Structural control maintenance	▪ By December 31, 2025, develop inventory of facilities with installed structural controls. ▪ By December 31, 2026 and each year after, develop written. maintenance procedures for structural controls; add controls to MS4 map; inspections performed for structural controls.	▪ At least one time annually, perform maintenance of 100% of the structural controls which require maintenance. Maintenance must be consistent with maintaining the effectiveness of the BMP. ▪ The permittee shall develop and maintain written procedures that define the frequency of inspections and how they will be conducted. ▪ Review and update the maintenance procedures at least one time annually to address changes or additions to the pollution prevention measure.	▪ Inventory of structural controls by facility established ▪ MS4 map updated to include structural controls ▪ Maintenance schedule and procedures developed ▪ Annual inspection of structural controls inspections for integrity and effectiveness. Inspection findings documented ▪ Number of established structural controls upgraded because of failure or poor performance

MCM 6: Pollution Prevention & Good Housekeeping for Municipal Operations			
Activity/BMP	**Implementation/Frequency**	**Measurable Goals**	**Indicators to Measure Progress**
J. Storm sewer system operation and maintenance	▪ By December 31, 2025, develop O&M program for storm sewer inspections and containment mitigation; support community collection efforts for household hazardous waste. ▪ By December 31, 2026 and each year after, inspect inlet boxes for sediment and debris.	▪ Develop and implement an O&M program to reduce to the MEP the collection of pollutants in catch basins and other surface drainage structures each year to include: ✓ Inspect at least 25% of the small MS4 owned and operated stormwater inlets each year. ✓ Collect and dispose of or recycle used oil and other household hazardous waste (HHW) from the public in at least three events each year.	▪ Number of Household Hazardous Waste (HHW) events held annually ▪ HHW participation rates per event ▪ Participation rates (traffic or volume) for City of Bryan Drop Off Recycling Center waste oil collection ▪ Number of inspections inlet and catch basins completed ▪ Percent of system inspected
K. Storm sewer system operation and maintenance	By December 31st of each year, update MS4 map to reflect potential problem areas.	▪ Develop a list of 100% of the identified potential problem areas (for example, areas with reoccurring illegal dumping) and prioritize problem areas for increased inspection. Review and update the list of potential problem areas at least one time annually to address changes or additions to the list.	▪ Inventory of high priority areas developed and added to MS4 map ▪ Number of high priority areas added/deleted ▪ Annual review completed
L. Operation and maintenance program to reduce discharges of pollutants from roads	By December 31st of each year, perform street sweeping for debris removal and collection.	▪ Develop and implement a street sweeping and cleaning program to address 75% of the small MS4 area each year and	▪ Number of street miles swept ▪ Percent MS4 area swept

MCM 6: Pollution Prevention & Good Housekeeping for Municipal Operations			
Activity/BMP	**Implementation/Frequency**	**Measurable Goals**	**Indicators to Measure Progress**
		sweeping 100% of the MS4 area at least two times by the end of the permit term.	
M. Mapping of facilities	By December 31st of each year, evaluate accuracy of MS4 map (outfalls, facilities listing, and priority areas).	▪ Map and identify 100% of the permittee-owned and operated facilities and stormwater controls installed. ▪ Review and update the MS4 map at least one time annually to address changes or additions to the facilities or controls.	▪ MS4 map updated and current ▪ Annual review completed
N. Assessment of facilities	By December 31st of each year, facility assessments completed by responsible departments.	▪ Review permittee owned facilities at least one time per permit for potential to discharge pollutants into stormwater.	▪ Number of facilities inventoried ▪ Number of evaluations completed ▪ Percent of facility evaluated
O. Identification of High Priority Facilities	By December 31st of each year, review inventory of High Priority facilities.	▪ Identify permittee owned and operated facilities identified as “High Priority” based on their potential to have a high potential to generate stormwater pollutants. A list of 100% of the identified facilities must be developed and maintained each year. ▪ Review/update the list of high priority facilities at least one time annually to address changes or additions to the facilities.	▪ Number of High Priority facilities inventoried and mapped ▪ Number of High Priority facilities with SOPs ▪ Number of TXR050000 facilities ▪ Annual review completed

MCM 6: Pollution Prevention & Good Housekeeping for Municipal Operations			
Activity/BMP	**Implementation/Frequency**	**Measurable Goals**	**Indicators to Measure Progress**
P. Documentation of assessment results	By December 31st of each year, complete facility assessments.	▪ Document the results of all assessments and maintain copies of 100% of the site evaluations checklists used to conduct the assessments each year.	▪ Percentage of facilities inspected vs facilities inventoried ▪ Annual inspections completed
Q. Development of facility-specific SOPs	By December 31st of each year, review SOPs for High Priority facilities.	▪ Develop facility-specific stormwater management SOPs for 100% of the MS4 owned and operated facilities. A description of 100% of the BMPs developed. ▪ Review ad update the facility-specific SOPs at least one time annually to address changes or additions to the facilities. ▪ If requested, SOPs must be made available to TCEQ 24 hours of the request for review.	▪ Number of High Priority facilities inventoried ▪ Number of High Priority SOPs reviewed ▪ Number of TXR050000 facilities
R. Stormwater controls for High Priority Facilities and Good housekeeping	By December 31st of each year, assess stormwater controls at High Priority facilities.	▪ Shelter from exposure to stormwater 100% of materials with a potential to contribute a stormwater pollution each year.	▪ Implement controls, where possible, to practice covered storage of chemicals and raw materials ▪ Number of High Priority facility inspections ▪ Number of TXR050000 facilities

MCM 6: Pollution Prevention & Good Housekeeping for Municipal Operations			
Activity/BMP	**Implementation/Frequency**	**Measurable Goals**	**Indicators to Measure Progress**
S. Stormwater controls for High Priority Facilities, deicing and anti-icing material	By December 31st of each year, assess stormwater controls at High Priority facilities.	▪ Ensure that 100% of stormwater runoff from storage piles of salt or other de-icing and anti-icing materials is not discharged each year.	▪ Implement controls, where possible, to practice covered storage of chemicals and raw materials ▪ Annual inspection completed
T. Stormwater controls for High Priority Facilities, fueling and vehicle maintenance	By December 31st of each year, annually inspect vehicle maintenance and fueling facilities for conformance with its SOP.	▪ Develop and implement SOPs that address spill prevention and spill control at 100% of permittee-owned and operated vehicle fueling, vehicle maintenance, and bulk fuel delivery facilities each year. ▪ Review and update the facility specific SOPs at least one time annually to address changes or additions to the facilities.	▪ Number vehicle maintenance and fueling facilities ▪ Number of vehicle maintenance and fueling SOPs ▪ Annual review completed
U. Stormwater controls for High Priority Facilities, equipment and vehicle washing	By December 31st of each year, review SOPs for High Priority facilities.	▪ Develop and implement SOPs that address equipment and vehicle washing activities at 100% of the permittee-owned and operated facilities where washing occurs. ▪ Review and update the facility specific SOPs at least one time annually to address changes or additions to the facilities.	▪ Number of High Priority facilities inventoried ▪ Number of High Priority facilities with SOPs ▪ Number of High Priority SOPs reviewed ▪ Annual review competed ▪ Number of TXR050000 facilities

MCM 6: Pollution Prevention & Good Housekeeping for Municipal Operations			
Activity/BMP	**Implementation/Frequency**	**Measurable Goals**	**Indicators to Measure Progress**
V. Inspections for High Priority Facilities	By December 31st of each year, perform inspections of High Priority facilities.	▪ Develop and implement an inspection program, which at a minimum must include inspections of 100% of High Priority permittee-owned and operated facilities one time per year. ▪ The results of 100% of the inspections and observations must be documented and available for review by TCEQ each year.	▪ Number of High Priority facilities inventoried ▪ Number of inspections completed for High Priority facilities ▪ Percent of High Priority facilities inspected ▪ Number of TXR050000 facilities

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