

*City of Hunters Creek Village MS4  
For Compliance with TXR040000*

**TXR040206**

Prepared for:  
The City of Hunters Creek Village  
1 Hunters Creek Place  
RN: 105551402



**March 2025**

Prepared by:



TBPE Firm Registration No. 274 | TBPLS Firm Registration No. 100467

Construction Management ▪ Geographic Information Systems ▪ Hydraulics and Hydrology ▪  
Land Development  
Public Works ▪ Right-of-Way Acquisition ▪ Site Development ▪ Subsurface Utility Engineering  
Surveying ▪ Telecommunications ▪ Transportation ▪ Utility Coordination and Design

4424 Sam Houston  
Parkway N, Suite 600

Houston, Texas  
77041

713.462.3242

fax  
713.462.3242

## TABLE OF CONTENTS

Definitions.....	4
MS4 Information .....	6
Coalition Shared SWMP.....	7
MCM 1: Public Education and Outreach.....	9
Target Audience and Pollutants: Information .....	10
Target Audience and Pollutants: Worksheet .....	11
Public Education and Outreach BMP: Instructions.....	12
Public Education and Outreach BMP: Worksheet .....	15
MCM 2: Public Involvement/Participation.....	17
Public Involvement and Participation: Instructions .....	18
Public Involvement and Participation: Worksheet .....	20
MCM 3: Illicit Discharge Detection and Elimination (IDDE) .....	21
MS4 Map: Instructions .....	22
IDDE Education and Training: Instructions .....	24
IDDE Education and Training: Worksheet.....	25
Public Reporting of Illicit Discharges and Spills: Instructions.....	26
Public Reporting of Illicit Discharges and Spills: Worksheet .....	27
IDDE Response Procedure: Instructions.....	28
IDDE Response Procedure: Worksheet .....	29
Source Investigation and Elimination: Instructions.....	30
Source Investigation and Elimination: Worksheet .....	31
IDDE Inspection: Instructions.....	33
IDDE Inspection Procedures: Worksheet.....	34
IDDE Inspection: Worksheet.....	35
MCM 4: Construction Site Stormwater Runoff Control.....	37
Stormwater Control Program.....	38
Construction Site Plan Review Procedure: Instructions.....	39
Construction Site Plan Review Procedure: Worksheet .....	40
Construction Site Inspections and Enforcement Procedure: Instructions .....	41
Construction Site Inspections and Enforcement Procedure: Worksheet .....	42
Construction Site Inspections and Enforcement Reports: Instructions.....	44
Construction Site Inspection Report: Worksheet .....	45
Information Submitted by the Public: Instructions .....	48
Information Submitted by the Public Procedure: Worksheet.....	49
MS4 Staff Training: Instructions .....	50
MS4 Staff Training: Log Sheet.....	51
MCM 5: Post Construction Stormwater Management in New Development and Redevelopment.....	52
Post-Construction Stormwater Management Program.....	53
Enforcement Records.....	54
Long-Term Maintenance of Post-Construction Stormwater Control Measures: Instructions.....	55
Long-Term Maintenance of Post-Construction Stormwater Control Measures: Worksheet.....	56

POC Benchmarks..... 74  
Monitoring and Assessment Plan: Instructions..... 75  
Monitoring/Assessment Plan: Worksheet..... 76

## Definitions

### *TXR040000, Part 1. Definitions*

**Best Management Practices (BMPs):** Schedules of activities, prohibitions of practices, maintenance procedures, structural controls, local ordinances, and other management practices meant 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, and drainage from raw material storage areas.

**Control Measure:** Any BMP or other method used to prevent or reduce the discharge of pollutants to water in the state.

**Illicit Discharge:** Any discharge to a MS4 that is not entirely composed of stormwater, except discharges pursuant to this general permit or a separate authorization and discharges resulting from emergency fire-fighting activities.

**Industrial Activity:** Any of the 10 categories of industrial activities included in the definition of “stormwater discharges associated with industrial activity” as defined in [40 Code of Federal Regulations \(CFR\), Subsections 122.26\(b\)\(14\)\(i\)-\(ix\) and \(xi\)](#).<sup>7</sup>

**Maximum Extent Practicable (MEP):** The technology-based discharge standard for MS4s to reduce pollutants in stormwater discharges was established by the [Clean Water Act Section 402\(p\)](#).<sup>8</sup> A discussion of MEP as it applies to small MS4s is found in [40 CFR Section 122.34](#).<sup>9</sup>

**Measurable Goal:** A goal that tracks the progress of your program implementation. Measurable goals are objective markers or milestones to quantify the performance of your BMPs. This includes descriptions of actions you will take to implement each BMP, what you anticipate being achieved by each goal, and the frequency and dates for such actions taken. Example goals include specific recordkeeping practices that are quantifiable (i.e., investigating 80% of active construction sites).

**Minimum Control Measure (MCM):** Controls or management practices to help operators detail how they will comply with NPDES permit requirements. Examples of MCMs include but are not limited to public education and outreach, public participation and involvement, illicit discharge detection and elimination, construction site runoff control, post-construction runoff control, and pollution prevention and good housekeeping.

**Outfall:** A point source where a small MS4 discharges to “Waters of the U.S.” and does not include open conveyances connecting two municipal separate storm sewers, or pipes, tunnels, or other conveyances that connect segments of the same stream and are used to convey “Waters of the U.S.”

---

1. [www.tceq.texas.gov/goto/title-40-section-112.34](http://www.tceq.texas.gov/goto/title-40-section-112.34)  
2. [www.tceq.texas.gov/goto/cwa-npdes-section-402](http://www.tceq.texas.gov/goto/cwa-npdes-section-402)  
3. [www.tceq.texas.gov/goto/title-40-section-112.34](http://www.tceq.texas.gov/goto/title-40-section-112.34)

**Point Source:** Any discernible, confined, and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, landfill leachate collection system, vessel, or other floating craft from which pollutants are or may be discharged. This term does not include return flows from irrigated agriculture or agricultural stormwater runoff.

**Pollutant(s) of Concern:** For this permit, includes biochemical oxygen demand, sediment (such as total suspended solids, turbidity, or siltation), pathogens, oil and grease, and any pollutant that has been identified as a cause of impairment for any water body that will receive a discharge from a MS4.

**Small Municipal Separate Storm Sewer System (MS4):** A conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, and storm drains) that are designed or used for collecting or conveying stormwater and are owned or operated by a city, county, military base, large hospital, prison, or other public body.

**Traditional Small MS4:** Systems that can pass ordinances and have the authority to enforce the stormwater management program. An example of a traditional MS4 is a city.

**Non-traditional Small MS4:** These systems generally do not have the authority to pass ordinances or enforce the stormwater management program. Non-traditional small MS4s include entities such as counties, transportation authorities (like the Texas Department of Transportation), municipal utility districts, drainage districts, military bases, prisons, and universities.

**Structural Control:** A pollution prevention practice that requires the construction of a device, or the use of a device, to capture or prevent pollution in stormwater runoff. Structural controls may include wet ponds, infiltration basins, stormwater wetlands, silt fences, sediment traps, check dams, storm drain inlet protection, rock outlet protection, and temporary or permanent sediment basins.

## **MS4 Information**

MS4 Name: City of Hunters Creek Village MS4

Address: 1 Hunters Creek Place RN: 105551402

MS4 Operator Contact Name: Tom Fullen

Phone : (713) 465 – 2150

Email: tfullen@cityofhunterscreek.org

Application Contact: Jacob Escobedo

Phone: (713) 462-3242

Email: jescobedo@cobbhendley.com

## Coalition Shared SWMP

*TXR040000, Part II, Section G.1*

Multiple small MS4s may combine or share efforts as a coalition in meeting one or more of the BMP requirements described in the general permit if they are:

- physically interconnected,
- located in the same urban area with a population of at least 50,000 people, or
- located in the same watershed.

Each regulated small MS4 must submit their own NOI and obtain a distinct permit authorization number.

**Identify the name and permit number for each MS4 operator that chooses to contribute to the development or implementation of this SWMP. Include written confirmation that the contributing MS4 operator(s) has agreed to contribute.**

**You may print additional copies of the following page as needed.**

MS4 Operator Name: \_\_\_\_\_

TPDES Permit ID: \_\_\_\_\_

Associated BMPs: \_\_\_\_\_

*Do you agree to contribute to the shared responsibilities of this SWMP?*

**Yes**       **No**

MS4 Operator Signature: \_\_\_\_\_

MS4 Operator Name: \_\_\_\_\_

TPDES Permit ID: \_\_\_\_\_

Associated BMPs: \_\_\_\_\_

*Do you agree to contribute to the shared responsibilities of this SWMP?*

**Yes**       **No**

MS4 Operator Signature: \_\_\_\_\_

**MS4 Operator Name:** \_\_\_\_\_

**TPDES Permit ID:** \_\_\_\_\_

**Associated BMPs:** \_\_\_\_\_

*Do you agree to contribute to the shared responsibilities of this SWMP?*

**Yes**       **No**

**MS4 Operator Signature:** \_\_\_\_\_

**MS4 Operator Name:** \_\_\_\_\_

**TPDES Permit ID:** \_\_\_\_\_

**Associated BMPs:** \_\_\_\_\_

*Do you agree to contribute to the shared responsibilities of this SWMP?*

**Yes**       **No**

**MS4 Operator Signature:** \_\_\_\_\_

**MS4 Operator Name:** \_\_\_\_\_

**TPDES Permit ID:** \_\_\_\_\_

**Associated BMPs:** \_\_\_\_\_

*Do you agree to contribute to the shared responsibilities of this SWMP?*

**Yes**       **No**

**MS4 Operator Signature:** \_\_\_\_\_

---

## **MCM 1: Public Education and Outreach**

*TXR040000*

### **Instructions**

Implement a public education and outreach program to share educational materials with the community. Conduct equivalent outreach about the impacts of stormwater discharges on water bodies and steps the public can take to reduce pollutants in stormwater runoff. Complete the provided worksheets each year of the permit term.

If your MS4 discharges Pollutants of Concern (POCs) to an impaired water body, and you're required to have benchmarks associated with target pollutants, refer to Part III, Section A.3, of the permit and the associated [POC Benchmark: Worksheet](#) found at the end of this template.

### **Updates and Recordkeeping**

Review public education and outreach efforts annually. Keep records of education and outreach efforts to show compliance with measurable BMP goals for each year of the permit term. Print out additional worksheets as needed.

## Target Audience and Pollutants: Information

*TXR040000, Part III and Part IV, Section D.1.a.1-2*

### Target Appropriate Audiences for Education and Outreach Programs

At a minimum, include the following target audiences:

- **Traditional MS4s** and counties must address the residents served by the MS4.
- **Non-traditional MS4s** (other than counties) must address the community served by the MS4. Examples include:
  - Universities target the faculty, staff, and students.
  - Military bases target military personnel (and dependents), and employees (including contractors).
  - Prison complexes or other multi-building complexes target staff and contractors.
  - Municipal Utility Districts and other special districts target residents served, staff, and contractors.
  - Transportation authorities address staff, contractors, and users.

### Target Specific Pollutants

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

## Target Audience and Pollutants: Worksheet

Year(s): 2024

<b>Target Audience</b>	<b>Target Pollutants</b>
Restaurants	Discharge of fats, oils, and grease
Residential Housing	Dumping of fats, oils, and grease

## **Public Education and Outreach BMP: Instructions**

*TXR040000, Part III and Part IV, Section D.1.a.3*

### **Create or Support Public Education and Outreach**

Review Table 2 to find the minimum number of education and outreach BMPs required.

**Table 2. Public Education and Outreach Minimums**

<b>MS4 Level</b>	<b>Minimum Number of Public Education and Outreach BMPs</b>
Level 1	Three BMPs
Levels 2a and 2b	Four BMPs

Example public education and outreach BMPs are listed in Table 3. BMPs that are ongoing throughout the reporting year or permit term count as one annual BMP.

### **Identify How BMPs Relate to the Target Audience and Target Pollutant(s)**

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

Examples of targeted outreach include:

- A newsletter sent to automotive mechanics about new ordinances against illegal dumping and discharges.
- An electronic fact sheet about hazardous household waste disposal sent to residents after they apply for trash or recycling services

### Identify the Measurable Goal for Each BMP Selected

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

**Table 3. Required Public Education and Outreach BMPs**

Activity/BMP	Measurable Goal
Information on the MS4 operator’s website.	Maintain a webpage with current, accurate information and working links. <ul style="list-style-type: none"> <li>• All links shall be checked, and the page shall be updated as necessary at minimum of once annually.</li> <li>• Must be maintained for the full year, each year.</li> </ul>
Social Media posts, social media campaign.	Post a minimum of four times each year on a minimum of one social media platform. <ul style="list-style-type: none"> <li>• The message must address ways attendees can minimize or avoid adverse stormwater impacts or practices to improve the quality of stormwater runoff.</li> <li>• The messages must be seasonally appropriate.</li> <li>• Posts must be visible to the public for the full year each year.</li> </ul>
Maintain or mark storm drains and inlets with, “No Dumping - Drains to Creek” or a similar message.	Placard, stencil, or paint at least 10% of all known stormwater inlets in either high-impact areas identified by the small MS4 operator or impairment watersheds within the MS4 area each year.  Where all known stormwater inlets have been marked, inspect, and maintain the markers for a minimum of 15% of all known stormwater inlets in either high-impact areas identified by the small the MS4 operator or impairment watersheds within the MS4 area each year.
Media/advertising campaign/public service announcements in areas of high visibility: billboard/poster; Bus shelter/bench; radio/television/movie theatre; and kiosks.	Develop topics that address activities or pollutants of concern.  Advertisements must: <ul style="list-style-type: none"> <li>• Be active at least three weeks each year; or</li> <li>• 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).</li> </ul>

<p>Publish articles in local newspapers or newsletter, may be electronic.</p>	<p>Develop article topics that are group specific and address activities or pollutants of concern at a seasonally appropriate time.</p> <p>Publish or email at least two articles to target audience groups each year.</p>
<p>Fact sheets/ brochures/utility bill inserts/door hangers.</p>	<p>Develop material topics that are group specific and address activities or pollutants of concern.</p> <p>Fact sheets, brochures, bill inserts, door hangers, or handouts must be distributed each year for at least 75% of the intended audience. Develop and implement tracking system to estimate what percentage of the intended audience is reached for determining BMP effectiveness.</p>
<p>Permanent stormwater related signage.</p>	<p>Place signage in a location where the message is relevant, and highly visible to target audience.</p> <p>Signage will count as annual BMP for the year it was put in place and for each subsequent year of this permit cycle as long as each of those years, the permittee inspects and maintains, as necessary, 100% of the signage once annually.</p>
<p>Promote, host, or develop educational meetings, seminars, or trainings.</p>	<p>Hold, host, or promote a minimum of one event for level 1 and 2 MS4s or two events for level 3 and 4 MS4 annually.</p> <ul style="list-style-type: none"> <li>• The events shall address ways attendees can minimize or avoid adverse impacts to stormwater or practices to improve the quality of stormwater runoff.</li> <li>• These events may address different pollutants and audiences.</li> </ul>
<p>Targeted educational campaign via mail, email, or in person.</p>	<p>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 intended audience is reached for determining BMP effectiveness.</p> <p>(Examples: Sediment control with small building permit; leaf litter email during street sweeping season; or education brochure to all businesses conducting a certain activity)</p>

## Public Education and Outreach BMP: Worksheet

Year(s): 2024 -2028

<b>BMP/Activity</b>	<b>Target Audience</b>	<b>Target Pollutant</b>	<b>Measurable Goal</b>
Information on the MS4 operator’s website.	Anyone with internet access	Discharge of fats, oils, grease, and solid waste	The City will maintain a webpage with current and accurate information and working links. The page shall be updated as necessary at a minimum of once annually.
Fact sheets/ brochures/utility bill inserts/door hangers.	Restaurants/ Residential Homes	Discharge of fats, oils, grease, and solid waste	Develop material topics that are group specific and address activities or pollutants of concern. The City will distribute each year for at least 75% of the intended audience. Develop and implement a tracking system to estimate what percentage of the intended audience is reached for determining BMP effectiveness.
Permanent stormwater related signage.	Residents	Discharge of solid waste	Place signage in a local park with high traffic and highly visible to target audience.

Promote, host, or develop educational meetings, seminars, or trainings.	Residents	Bacteria	Hold, host, or promote an event annually. The events shall address ways attendees can minimize or avoid adverse impacts to stormwater or practices to improve the quality of stormwater runoff.
Maintain or mark storm drains and inlets with, "No Dumping - Drains to Creek"	Residents	The discharge of oils, grease, and hazardous chemicals	Stencil, a minimum of 10% of all known stormwater inlets in high-impact areas each year. Where all known stormwater inlets have been marked, inspect, and maintain the markers for a minimum of 15% of all known stormwater inlets in either high-impact areas each year.

## **MCM 2: Public Involvement/Participation**

*TXR040000, Part III and Part IV, Section D.2*

### **Instructions**

Small MS4s, except prisons and correctional facilities, must involve the public to achieve compliance with this permit. At a minimum, small MS4s must meet state and local public notice requirements and create or support community-led activities for the community to be involved with the SWMP. The public activities and BMPs must show a positive impact on stormwater runoff quality.

### **Updates and Recordkeeping**

Review public involvement and participation efforts annually. Keep records to show compliance with BMP measurable goals (e.g., attendance sheets and event advertisements) for each year of the permit term. Print out additional worksheets as needed.

## Public Involvement and Participation: Instructions

*TXR040000, Part III and Part IV, Section D.2*

### Create or Support Public Involvement and Participation

You may partner with and support other MS4 operators to maximize cost effectiveness of the required public involvement and participation activities.

Support must include at least one of the following or similar:

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

Implement the Appropriate Number of Public Involvement **and** Participation Opportunities

**Table 4. Public Involvement/Participation Minimums**

MS4 Level	Minimum Number of Public Education and Outreach BMPs
Level 1	Two BMPs
Levels 2a and 2b	Three BMPs

Example Public Involvement and Participation BMPs are listed in Table 5.

### Identify How Activities/BMPs Impact Stormwater Runoff

List the activities that you will do to fulfill the MCM requirement from Table 5. If you discharge to an impaired water body, design your BMPs to reduce the discharge of POCs. Provide the measurable goals used to achieve the activity or BMP.

**Table 5. Required Public Involvement and Participation BMPs**

<b>Activity/BMP</b>	<b>Measurable Goal</b>
Clean-up events	<p>Host at least two events annually.</p> <p>For consideration, the land area cleaned must be at least:</p> <ul style="list-style-type: none"> <li>• Two acres</li> <li>• 400 yards of a stream, streambank, riparian area, or</li> <li>• Two miles of roadside</li> </ul> <p>You can combine these, such as one acre of land and 200 yards of stream.</p>
Habitat improvement	<p>Annually, host at least two events that involve tree planting, invasive vegetation removal and stream restoration.</p> <p>The project must be at least 0.5 acres or 25 yards for consideration.</p> <p>Events can take place in streams, parks, areas adjacent to public waterways, or other green spaces.</p> <p>Events can be a combination of locations and areas.</p>
Volunteer water quality monitoring	<p>Host or support at least one event annually.</p> <p>Conduct monitoring annually to be considered an event.</p>
Stormwater speaker series	<p>Provide at least two sessions each year. These may be different speakers or audiences.</p>
Stormwater survey	<p>Provide at least one public survey annually for input on the program that reaches at least 75% of the intended audience.</p>
Public education events and workshops	<p>Host at least one project or training annually on stormwater topics.</p> <p>Stormwater topics include building rain barrels, fertilizer application training, rain garden and bio retention creation or maintenance, and how to recognize and report illicit discharge activities.</p> <p>Examples of target audiences include residents, homeowner associations (HOA), or other public groups.</p>
Educational display/booth	<p>Create one booth or display annually at a school, public event, or similar event that provides information or displays to improve public understanding of issues related to water quality.</p> <p>Staff the booth or display when the event is open to the public.</p>
Public input meeting	<p>Host at least one meeting annually for input on the program implementation such as city council meetings, board meeting, or stakeholder meetings.</p> <p>Event advertisement must reach at least 75% of the intended audience.</p>

## Public Involvement and Participation: Worksheet

Year(s): 2024-2028

<b>Activity/BMP</b>	<b>Measurable Goal</b>
Clean-Up Event	The City will set up a cleaning event, where at least 400 yards or streams, streambanks, or riparian area or two miles of roadside.
Host Informative Event	The City will host an event that will inform residents how to recognize illicit discharge activities.

## **MCM 3: Illicit Discharge Detection and Elimination (IDDE)**

*TXR040000, Part III and Part IV, Section D.3*

### **Includes:**

- MS4 Map (see [page 24](#))
- IDDE Education and Training (see [page 25](#))
- Methods for Public Reporting of Illicit Discharges and Spills (see [page 27](#))
- IDDE Response Procedures (see [page 29](#))
- Source Investigation and Elimination Procedures (see [page 31](#))
- IDDE Inspection Procedures (see [page 34](#))
- On-Site Sewage Facility (OSSF) Procedures (if applicable [see page 38](#))

### **Instructions**

Develop, implement, and enforce a program to investigate, detect, and eliminate illicit discharges. Include a plan to detect and eliminate illicit discharges and a plan to detect and address non-stormwater discharges, including illegal dumping.

If you discharge to an impaired water body, design your BMPs to reduce the discharge of a POC.

### **Updates and Recordkeeping**

Review and update worksheets at least once annually to address changes and make improvements to procedures where applicable. Be sure to record revision dates throughout the permit term. Print out additional worksheets as needed.

## MS4 Map: Instructions

*TXR040000, Part IV, Section D.3.c.1*

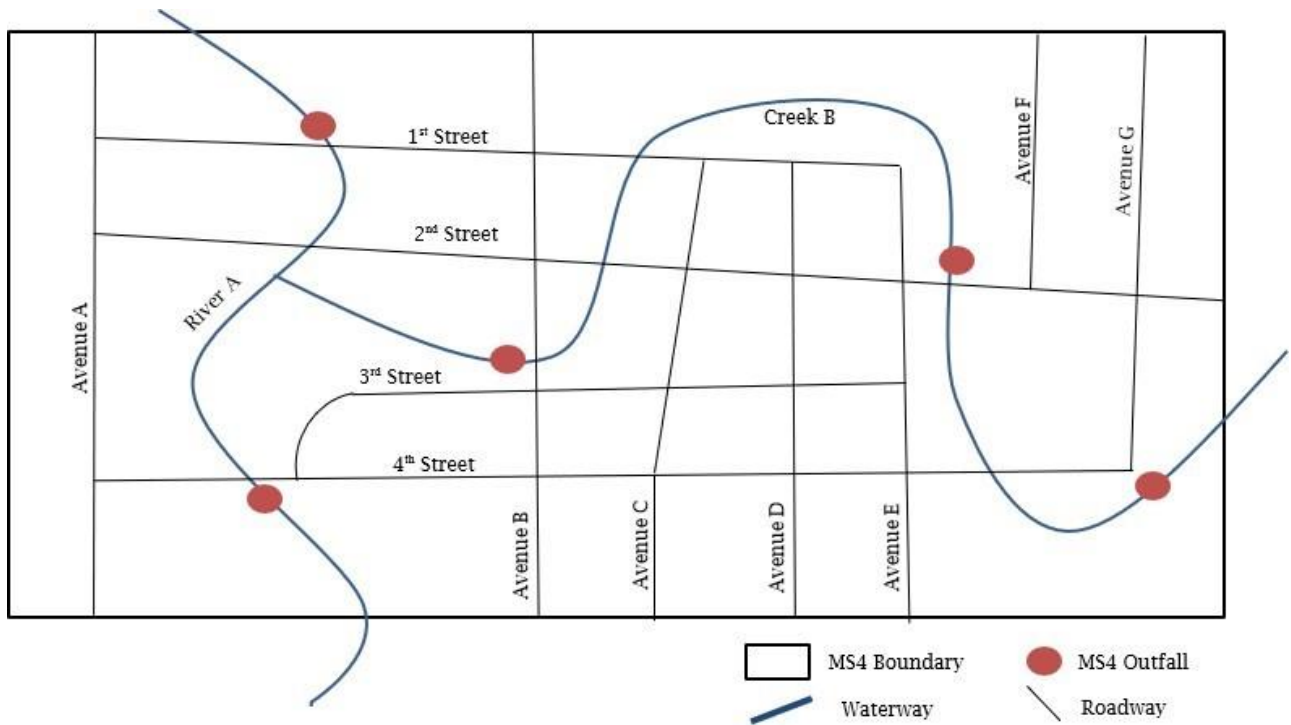
### Maintain a Current and Accurate MS4 Map

Insert a copy of the most current MS4 map after this page. Review and update your MS4 map as necessary and at least once annually. Include features which have been added, removed, or changed.

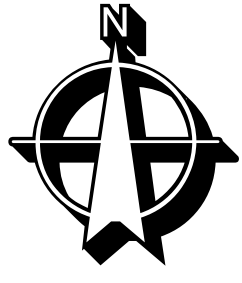
The map must include:

- The location of all the outfalls operated by the MS4 that discharge into Waters of the U.S.
- The location and name of all surface waters receiving discharges from the outfalls.
- Date of last revision.

An example MS4 map can be found below.

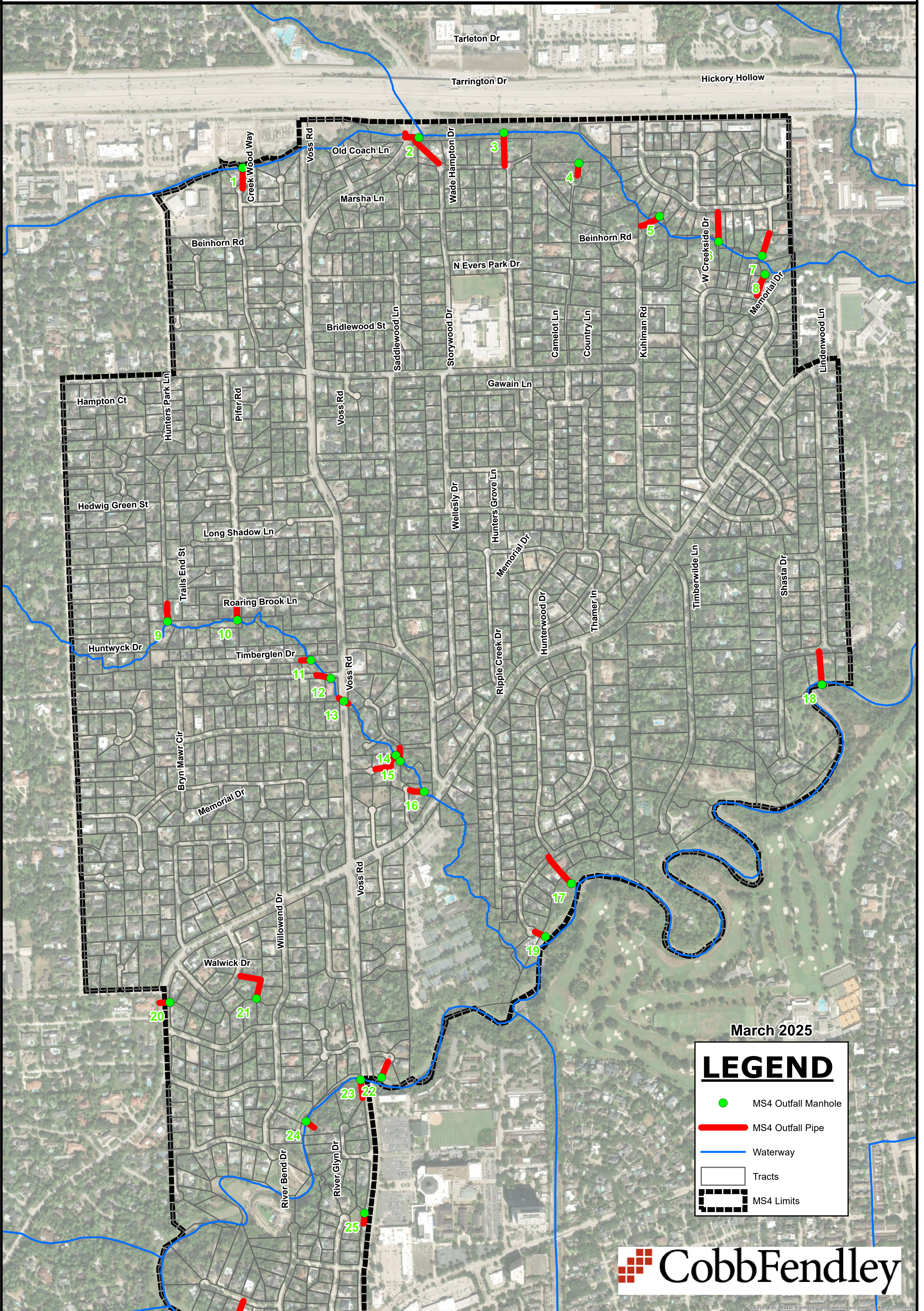


**Figure 1. MS4 Map Example**



0 250 500 1,000  
FEET

# Hunters Creek Village MS4 Map



March 2025

## LEGEND

- MS4 Outfall Manhole
- MS4 Outfall Pipe
- Waterway
- Tracts
- MS4 Limits



Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

## **IDDE Education and Training: Instructions**

*TXR040000, Part IV, Section D.3.c.2*

### **Educate and Train Employees on IDDE**

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

### **Document Training Activities**

Use this log to record the training dates and topics covered, and note whether the training is:

- An in-person presentation,
- A training video,
- Training material to read, or
- Some other type of training.

Have attendees print their name, title, and sign the attendance log sheet. Maintain training attendance records for review by TCEQ when requested.



## **Public Reporting of Illicit Discharges and Spills: Instructions**

*TXR040000, Part IV, Section D.3.c.3*

### **Maintain and Facilitate a Public Reporting Method**

The public should have at least one method to report illicit discharges, illegal dumping, or water quality impacts associated with discharges. Maintain the reporting mechanism during the permit term. Examples of public reporting methods include a hotline, online forms, posted signage, pamphlets, etc.

In addition, all MS4s must publicize their reporting method at least twice annually in a way designed to reach the majority of the intended audience. If you have a public website, you are required to continuously maintain and publicize the reporting function on the website. To determine the effectiveness of your publicized BMP, develop and implement a tracking system to estimate what percentage of the intended audience is reached.

## Public Reporting of Illicit Discharges and Spills: Worksheet

**Year:** 2024

**Dates Available:** Not Applicable. Hunter's Creek Village will implement in 2025.

### Identify your MS4's Public Reporting Method(s):

Hotline

\_\_\_\_\_

Webpage

<http://cityofhunterscreek.com/>

Posted Sign(s)

\_\_\_\_\_

Pamphlets

\_\_\_\_\_

Other

\_\_\_\_\_

### What method(s) did you use to publicize your reporting mechanisms?

The City publicized the reporting mechanisms on their website.

### What dates did you publicize your reporting mechanisms?

The reporting mechanisms were publicized on July 1<sup>st</sup> and December 1<sup>st</sup>.

### What kind of tracking system will your MS4 use to estimate BMP effectiveness?

The MS4 will use two kinds of tracking systems to estimate BMP effectiveness.

The City will track all illicit discharges and spills using Excel, creating spreadsheets. The City will post updates twice a year on their website.

## **IDDE Response Procedure: Instructions**

*TXR040000, Part IV, Section D.3.c.4*

### **Develop and Maintain IDDE Response Procedures**

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

Procedures may include:

- Emergency response contact information
- How to manage incoming complaints
- Instructions for necessary reports

Review and update the procedures at least once annually to address changes and make improvements to the procedures when necessary.

## **IDDE Response Procedure: Worksheet**

**Date last revised:** 02/01/2025

### **Emergency Response Contact Information**

<b>Contact Name</b>	<b>Phone Number</b>
Tom Fullen	(713) 465-2150

### **How will your MS4 monitor for complaints regarding illicit discharges?**

The MS4 keep record of the complaints in an excel spreadsheet to monitor the complaints regarding illicit discharges. This will ensure the complaint is being addressed, and it keeps track of how often a specific area is being reported.

### **How will your MS4 respond to illicit discharges, illegal dumping, and spills?**

The City of Hunters Creek Village will respond to illicit discharges, illegal dumping, and spills by monitoring and identifying high priorities area within the MS4 likely to have these actions. The City will conduct a site inspection and fill out the necessary documents for Monitoring these areas will help prevent the condition from worsening if it does occur, avoiding further complications.

The City will have procedures in place to track down the source of the illicit discharge, eliminate them, and steps on how to follow up.

## Source Investigation and Elimination: Instructions

*TXR040000, Part IV, Section D.3.c.5*

### Investigate and Eliminate Illicit Discharges and Illegal Dumping

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

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

If your program is a Level 2b MS4 who reports events to another agency, specify which agency and their contact information:

Agency Name: \_\_\_\_\_

Contact Information: \_\_\_\_\_

### Source Investigation and Elimination: Worksheet

Open Investigation Date and Time:	
Initial or Follow-up Investigation:	
Location of Investigation:	
Name(s) of Investigator(s):	
Priority of Illicit Discharge:	<input type="checkbox"/> Low <input type="checkbox"/> Medium <input type="checkbox"/> High
Close Investigation Date and Time:	

**What was the source of the illicit discharge or illegal dumping?**

---

---

---

---

---

**Did you observe any active discharges during your investigation?**

Yes (describe below)     No

---

---

---

---

**Investigation Findings:**

---

---

---

---

---

---

**Are any corrective actions needed?**

Yes (describe below)  No

---

---

---

---

---

**Will any other agency or TCEQ regional office need to be contacted?**

Yes (describe below)  No

---

---

**Will a follow-up investigation be conducted?**

Yes (describe below)  No

**Follow-up Investigation Date:** \_\_\_\_\_

## **IDDE Inspection: Instructions**

*TXR040000, Part IV, Section D.3.c.6*

### **Develop and Maintain Inspection Procedures**

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

### **Keep Records of Inspections in Response to Complaints**

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

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

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

## **IDDE Inspection Procedures: Worksheet**

**Date Last Revised:** 02/01/2025

### **How will your MS4 conduct IDDE inspections in response to complaints?**

The City shall conduct inspections, as determined appropriate, in response to complaints, and shall conduct follow up inspections as necessary to ensure that corrective actions have been implemented by the responsible party.

### **How will your MS4 prioritize inspections?**

The City will prioritize inspections based on the construction sites in accordance with finalized site inspection protocols and procedures that outline city inspection and enforcement requirements. The City requires corrective action for observed violations and pursues enforcement when necessary.

### **What are the criteria that initiate a follow-up inspection?**

The City will allow for an appropriate timeline for the responsible party to solve the violation before the follow up inspection. The City will ensure to follow up on every violation that occurs to ensure the illicit discharge is eliminated and has not continued.

### **How will your MS4 ensure that corrective action has been taken?**

The City will ensure that corrective action has been taken by having regular inspections to construction sites that could have illicit discharges. Documenting and keeping records of these inspections and violations will ensure the City will follow up on these cases.

## IDDE Inspection: Worksheet

Date Complaint Received:	
Open Inspection Date and Time:	
Initial or Follow-up Investigation:	
Location of Inspection:	
Name(s) of Inspector(s):	
Priority of Illicit Discharge:	<input type="checkbox"/> Low <input type="checkbox"/> Medium <input type="checkbox"/> High
Close Inspection Date and Time:	

### **Complaint Information:**

**Complainant Name:** \_\_\_\_\_

**Complainant Contact Information:** \_\_\_\_\_

### **Additional Notes:**

---

---

---

---

**Did you observe any active discharges during your inspection?**

Yes (describe below)     No

---

---

---

---

**Inspection Findings:**

---

---

---

---

---

---

---

**Are any corrective actions needed?**

Yes (describe below)  No

---

---

---

---

---

**Will a follow-up inspection be conducted?**

Yes (describe below)  No

**Follow-up Investigation Date:** \_\_\_\_\_

## MCM 4: Construction Site Stormwater Runoff Control

*TXR040000, Part IV, Section D.4*

### Includes:

- Stormwater Control Program Information (see [page41](#))
- Construction Site Plan Review Procedures (see [page42](#))
- Construction Site Inspections and Enforcement Procedures (see [page 44](#))
- Construction Site Inspections and Enforcement Reports (see [page 46](#))
- Information Submitted by the Public (see [page 50](#))
- MS4 Staff Training (see [page 52](#))

### Instructions

Develop, implement, and enforce a program for operators of all construction activities to select, install, implement, and maintain stormwater control measures that prevent illicit discharges to the MEP. The program must include:

- The development and implementation of an ordinance or another regulatory mechanism.
- Procedures for processing information submitted by the public.
- MS4 staff.

### Updates and Recordkeeping

Review and update applicable city ordinances and other regulatory mechanisms at least once during the permit term to address changes and make improvements. Review and update procedures at least once annually to address changes and make improvements. Print out additional worksheets as needed.

### Resources

Find additional resources on the [Assistance Tools for Construction Stormwater General Permits webpage](#).<sup>10</sup>

---

4. [www.tceq.texas.gov/assistance/water/stormwater/sw-construction.html](http://www.tceq.texas.gov/assistance/water/stormwater/sw-construction.html)

## Stormwater Control Program

*TXR040000, Part IV, Section D.4.b.1-2*

### Develop and Maintain City Ordinances

Require all construction site operators to implement appropriate erosion and sediment control BMPs. The stormwater control program should ensure erosion and sediment controls, soil stabilization, and BMP requirements are effectively implemented for all construction activities discharging stormwater into your regulated area consistent with the [TPDES CGP, TXR150000](#).<sup>11</sup>

Maintain an ordinance or other regulatory mechanism to prohibit the below discharges:

- Wastewater from the washout of concrete and wastewater from water well drilling operations, unless managed by an appropriate control.
- Wastewater from the washout and cleanout of stucco and paint from releases of oils and other construction materials.
- Fuels, oils, and other pollutants used in vehicle and equipment operation and maintenance.
- Soaps and solvents used in vehicle and equipment washing.
- Discharges from dewatering activities, including discharges from dewatering trenches and excavations, unless managed by appropriate BMPs.

City Ordinance Number: Section 10.3

---

5. [www.tceq.texas.gov/goto/cgp](http://www.tceq.texas.gov/goto/cgp)

## **Construction Site Plan Review Procedure: Instructions**

*TXR040000, Part IV, Section D.4.b.3*

### **Implement Site Plan Review Procedures**

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

Site plan review procedures should include:

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

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

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

## **Construction Site Plan Review Procedure: Worksheet**

**Date Last Revised:** 02/01/2025

### **How will your MS4 review construction site plans?**

The City will review construction site plans based off the procedures that incorporate potential water quality impacts. The procedures cover the site inspection and enforcement of control measures to the extent allowable under state and local law.

Who will review construction site plans?

The MS4 operator will develop procedures for site plan review which incorporates consideration of potential water quality impacts. Permittees who can review construction site plans will be informed or trained to ensure they are knowledgeable.

### **What is your MS4's criteria for approving a construction site plan?**

The City will approve a construction site plan when the plan ensures the construction will have the minimum of pollutants in any storm water to the MS4 area due to construction activities. The City will attempt to prevent pollutants from causing a large disturbance of greater than or equal to one acre or if that construction activity is part of a larger common plan of develop or sale that would disturb one acre or more of land.

### **How will your MS4 decide when an operator can begin construction?**

The City will decide when construction can begin when the operator has ensured the construction site contractors have implemented an appropriate erosion and sediment control BMPs. This includes ensuring the design, install, implement and maintenance of BMPs to minimize the discharge of pollutants to the MS4 area.

## **Construction Site Inspections and Enforcement Procedure: Instructions**

*TXR040000, Part IV, Section D.4.b.4*

### **Implement Site Inspection Procedures**

Develop and maintain procedures for inspecting active construction projects. Non-traditional MS4s must conduct inspections of sites operated by the MS4 or contractors that are located in the MS4's regulated area.

Conduct inspections of at least 80% of active construction sites annually. Inspect site factors that may impact water quality, such as:

- Site slope and soil erosion potential.
- Project size and type.
- Proximity to and the sensitivity of receiving water bodies.
- Non-stormwater discharges.
- Past record of non-compliance by construction site operators.

Inspections of construction sites should evaluate the following:

- Site CGP TXR150000 coverage.
- Stormwater control measures implementation and maintenance.
- Compliance with MS4 ordinance(s) and other regulations.

Review and update inspection procedures at least once annually to address changes and make improvements to the procedures if necessary.

## **Construction Site Inspections and Enforcement Procedure: Worksheet**

**Date Last Revised:** 02/01/2025

### **What causes a construction site inspection?**

A construction site inspection is required to ensure the construction site is in compliance with local, state, and federal stormwater management regulations. If there are any complaints or concern from the public regarding poor stormwater management, the construction site will have an inspection. The construction site inspection will continue in accordance with finalized site inspection protocols and procedures that outline city inspection and enforcement requirements.

### **What does your MS4 need to do before an inspection occurs?**

The City will train and be familiarized with the program's requirements to ensure the interaction between the staff and inspectors can provide accurate information and access to materials. The City will ensure to review and update the best management practices to ensure the inspection is meeting the requirements. Once the City prepares the inspection records related to the stormwater management and are available for the inspection.

### **What criteria are inspected during construction site inspections?**

The City will inspect the construction site inspection in accordance with finalized site inspection protocols and procedures that outline city inspection and enforcement requirements.

### **What leads to enforcement from an inspection?**

After the inspection is performed, and the inspector determines the construction site is causing a land disturbance of greater than or equal to one acre or if the construction activity is part of a larger common plan of development and implementation of ordinance or other regulatory mechanism as well as sanctions, to ensure compliance to the extent allowable under state, federal, and local law, to require erosion and sediment control.

**What does your MS4 do for post-inspection follow-ups?**

The City will have at least one post inspection follow up actions to ensure compliance, address the issues, and ensure the stormwater management program being followed. The actions include reviewing the inspection report, implementing corrective actions, and following up on the correction actions in a timely manner. The violations and corrective actions should be reporting the issue to TCEQ.

## **Construction Site Inspections and Enforcement Reports: Instructions**

*TXR040000, Part IV, Section D.4.b.4*

### **Complete Site Inspection Reports**

Conduct inspections of at least 80% of active construction sites annually. Following a construction site inspection, inspector(s) must provide a written or electronic inspection report to the site operator(s).

Based on inspection findings, you should take all necessary follow-up actions to ensure compliance with permit requirements and the SWMP. Follow-up inspections and enforcement actions must be tracked, and records must be maintained for review by TCEQ when requested.

**Note:** Some Level 2b MS4s do not have the authority to investigate construction sites. Those Level 2b MS4s must notify the local authority with the jurisdiction to investigate. Provide their contact information below.

**Local Authority Name:** \_\_\_\_\_

**Contact Information:** \_\_\_\_\_

## Construction Site Inspection Report: Worksheet

<b>Inspection Date:</b>	
<b>Name(s) of Inspector(s):</b>	
<b>Site Name:</b>	
<b>TPDES Permit #:</b>	
<b>Site Contact Name:</b>	
<b>Site Contact Information:</b>	

**Does the site have active CGP TXR150000 coverage?**

Yes       No

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

Yes       No

**Have stormwater control measures been properly implemented and maintained?**

Yes       No (describe below)

---

---

---

**Does the site comply with MS4 ordinances and other applicable regulations?**

Yes       No (describe below)

---

---

---

---

**General Site Notes:**

---

---

---

---

---

**Is a follow-up inspection required?**

Yes (describe below)       No

---

---

---

---

---

---

**Is enforcement required?**

**Yes (describe below)**     **No**

---

---

---

---

---

## **Information Submitted by the Public: Instructions**

*TXR040000, Part IV, Section D.4.b.5*

### **Create Procedures for Processing Public Comments**

Develop, implement, and maintain procedures for receiving and considering information submitted by the public. Throughout the permit term, maintain one webpage, hotline, email, or a similar method for receiving information submitted by the public.

Review and update procedures at least once annually to address changes and make improvements to the procedures if necessary.

## Information Submitted by the Public Procedure: Worksheet

Date Last Revised: 02/01/2025

### How will your MS4 receive information submitted by the public?

Hotline:

\_\_\_\_\_

Webpage:

<http://cityofhunterscreek.com/>

Posted Sign(s):

\_\_\_\_\_

Pamphlets:

\_\_\_\_\_

Other:

\_\_\_\_\_

### How will your MS4 review information submitted by the public?

The City will review information submitted by the public by having a Contact Us Page that the public can submit inquiries and feedback.

## **MS4 Staff Training: Instructions**

*TXR040000, Part IV, Section D.4.b.6*

### **Educate and Train Employees**

Ensure that all staff whose primary job duties are related to implementing the construction stormwater program (including permitting, plan review, construction site inspections, and enforcement) are informed or trained to conduct these activities. The training may be conducted by MS4 staff or by outside trainers.

Conduct at least one training annually for 100% of all MS4 staff whose primary job duties are related to implementing the construction stormwater program. Training may be conducted in person or using self-paced training materials, such as videos or reading materials.

### **Document Training Activities**

Use this log to document any training activities. Record the training date, topics covered, and note whether the training is:

- An in-person presentation,
- A training video,
- Training material to read, or
- Some other type of training.

Have attendees print their name, title, and signature on the attendance log sheet. Keep records of attendance for review by TCEQ when requested.



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

*TXR040000, Part IV, Section D.5*

### **Includes:**

- Post-Construction Stormwater Management Program (see [page 55](#))
- Enforcement Records (see [page 56](#))
- Long-Term Maintenance of Post-Construction Stormwater Control Measures (see [page 57](#))

### **Instructions**

Develop, implement, and enforce a program to control stormwater discharges from new development and redeveloped sites discharging into your MS4 if these projects disturb one acre or more. This includes projects that disturb less than one acre that are part of a larger common plan of development.

The program must be established for private and public development sites. The program may utilize an offsite mitigation and payment plan in lieu of necessitating components to address this requirement.

### **Updates and Recordkeeping**

Review each MCM 5 section for updates as stated in the permit. Print out additional worksheets as needed.

## **Post-Construction Stormwater Management Program**

*TXR040000, Part IV, Section D.5.a.2*

### **Develop and Maintain City Ordinances**

You must use an ordinance or another regulatory mechanism to address post-construction runoff from new development and redevelopment projects. Establish, implement, and enforce a requirement that owners or operators of new development and redeveloped sites must design, install, implement, and maintain a combination of structural and non-structural BMPs appropriate for the community and protective of water quality.

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

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

**City Ordinance Number(s):**            Section 10.3

## **Enforcement Records**

*TXR040000, Part IV, Section D.5.b.1*

### **Follow recordkeeping requirements**

You will need to document and maintain records of enforcement actions and make them available for review by TCEQ when requested.

Maintain records of 100% of enforcement actions taken each year and make the records available to TCEQ for review within 24 hours of a request.

## **Long-Term Maintenance of Post-Construction Stormwater Control Measures: Instructions**

*TXR040000, Part IV, Section D.5.b.2*

### **Create a Maintenance Plan for Structural Stormwater Control Measures**

Long-term operation and maintenance of structural stormwater control measures should be addressed in one or both of the following ways:

- Maintenance performed by the MS4 (see [Part IV.D.6](#)<sup>12</sup> of the permit and [MCM6](#)).
- Maintenance performed by the owner or operator of a new development or redeveloped site under a maintenance plan.

If maintenance is performed by the owner or operator of a construction site, they must develop and implement a plan to address maintenance requirements for any structural control measures installed on-site.

All maintenance performed should be documented and retained on-site (e.g., the offices of the site owner or operator) and be made available for review by your operator or TCEQ within 24 hours of a request.

---

<sup>12</sup> [www.tceq.texas.gov/downloads/permitting/stormwater/general/ms4/2024-txr040000-general-permit-signed.pdf#page=55](http://www.tceq.texas.gov/downloads/permitting/stormwater/general/ms4/2024-txr040000-general-permit-signed.pdf#page=55)

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

<b>Site Name:</b>	
<b>Site Address:</b>	
<b>Site Contact:</b>	
<b>Site Contact Information:</b>	

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

- MS4 operators
- Construction site operators
- Combination of both

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

Has a maintenance plan been developed and implemented?

- Yes
- No

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

- Yes
- No

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

- Yes
- No

## **MCM 6: Pollution Prevention and Good Housekeeping for Municipal Operations**

*TXR040000, Part IV, Section D.6*

Operation and Maintenance (O&M) Program Includes:

- MS4-owned Facilities and Control Inventory (see [page 60](#))
- MS4 Training and Education (see [page 62](#))
- Contractor Oversight Procedures (see [page 64](#))
- O&M Evaluation (see [page 66](#))
- O&M Pollution Prevention Measures (see [page 68](#))
- O&M Pollution Prevention Inspection (see [page 70](#))
- Structural Control Maintenance Procedures (see [page 73](#))

### **Instructions**

Develop and implement an O&M program, including an employee training component designed to prevent or reduce pollutant runoff from municipal activities and municipally-owned areas including but not limited to:

- Park and open-space maintenance
- Stormwater system maintenance
- New construction and land disturbances
- Municipal parking lots
- Maintenance and storage yards for vehicles and equipment
- Waste transfer stations
- Salt and sand storage locations

### **Updates and Recordkeeping**

Review each MCM 6 section for updates as stated in the permit. Print out additional worksheets as needed.

## **MS4-Owned Facilities and Control Inventory: Instructions**

*TXR040000, Part IV, Section D.6.b.1*

### **Create an Inventory of Facilities and Stormwater Controls**

Develop and maintain an inventory of facilities and stormwater controls you own and operate in your MS4's regulated area. The inventory must include all permit numbers, registration numbers, and authorizations for each facility or stormwater control. You can search the [Central Registry database](#) for this information.

The inventory may include but is not limited to the following:

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

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

---

**13. [www15.tceq.texas.gov/crpub/](http://www15.tceq.texas.gov/crpub/)**

## MS4-Owned Facilities and Control Inventory: Worksheet

Facility name:	City of Hunters Creek Village MS4
TPDES Permit #:	TXR040206
Registration #:	RN105551402
Authorization:	NOI-Renewal
Facility address:	1 Hunters Creek Place
Stormwater controls:	

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

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

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

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

City to fill out.

## MS4 Training and Education: Instructions

*TXR040000, Part IV, Section D.6.b.2*

### **Train MS4 Employees**

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

### **Document Training Activities**

Use this log to document any training activities. Record the training dates and topics covered, and note whether the training was:

- An in-person presentation,
- A training video,
- Training material to read, or
- Some other type of training.

Have attendees provide their name, title, and signature on the attendance log sheet. Keep records of attendance for review by TCEQ when requested.



## Contractor Oversight Procedures: Instructions

*TXR040000, Part IV, Section D.6.b.4*

### **Develop Contractor Oversight Procedures**

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

Develop oversight procedures to ensure contractors are using appropriate control measures and standard operating procedures. Maintain these records on-site so they're available for review when requested by TCEQ.

## **Contractor Oversight Procedures: Worksheet**

Date Last Revised: 02/01/2025

### **How will you ensure that contractors are using appropriate stormwater control measures?**

The City will ensure that contractors are following the appropriate stormwater control measures by ensuring 100% of the contractors being hired are able 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. The City will implement oversight procedures of contractor activities in 100% of contracts to ensure the contractors are using appropriate control measures and SOPS each year.

### **How will you ensure that contractors are using appropriate standard operating procedures?**

The City will ensure that contractors are using appropriate standard operating procedures by ensuring the oversight procedures are maintained on-site 100% of contracts. The City will also only use contractors to implement pollution prevention and good housekeeping practices, ensuring training of 100% of the applicable contract staff is conducted at least one time annually using the contract language or another similar method.

## O&M Evaluation: Instructions

*TXR040000, Part IV, Section D.6.b.S.a-b*

### Identify Potential Pollutants

Evaluate O&M activities and identify their potential to discharge pollutants in stormwater, including but not limited to the examples listed in Table 6.

**Table 6. Examples of Potential Pollutants and Pollutant Sources**

Potential Pollutants	Potential Pollutant Sources
Paint, paving materials, sediment	Road and parking lot maintenance
Herbicides, pesticides, trash	Right-of-way maintenance
Deicing and anti-icing compounds	Cold weather operations

Review and update the pollutants of concern list at least once annually to address changes or additions to O&M activities.

## O&M Evaluation: Worksheet

Date Last Revised: 02/01/2025

Potential Pollutants	Potential Pollutant Sources
Bacteria	Domestic pets, human sewage from failing sewage systems, leaking sewers.

Needs to reflect the owned and operated sheet. To be filled out following City completion.

## **O&M Pollution Prevention Measures: Instructions**

*TXR040000, Part IV, Section D.6.b.S.c*

### **Implement Pollution Prevention Measures**

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

## O&M Pollution Prevention Measures: Worksheet

Identify which pollution prevention measures are being taken.

### Select at least two of the following:

- Replacing at least 50% of the MS4's materials and chemicals with more environmentally friendly materials or methods by the end of the permit term.
- Tracking 100% of the application of deicing and anti-icing compounds and recording the amount of compound used for each application annually.
- Using suspended tarps, booms, or vacuums to capture paint, solvents, rust, paint chips and other pollutants during at least 80% of regular bridge maintenance each year.
- Placing barriers around or conducting runoff away from 100% of deicing chemical storage areas to prevent discharge into surface waters each year.

### Are any additional pollution prevention measures being implemented?

No, there are not any additional pollution prevention measures being implemented at the moment.

## **O&M Pollution Prevention Inspection Procedures: Instructions**

*TXR040000, Part IV, Section D.6.b.S.d*

### **Develop Pollution Prevention Inspection Procedures**

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

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

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

### **Maintain Proper Records**

Keep a record log of all inspections available for review by TCEQ when requested.

## O&M Pollution Prevention Inspection Procedures: Worksheet

How will inspections be conducted?

The City will conduct inspections by visually inspecting 100% of pollution prevention measures implemented at permittee-owned facilities to ensure they are working. There will be written procedures that describe the frequency of inspections, and they will be conducted. The inspection procedure will be reviewed and updated annually to address changes or additions to the pollution prevention measures.

### How frequently will inspections be conducted?

The inspections will be conducted at least one time annually and will become more frequent if necessary.

Pollution Prevention Measure	Inspection Frequency	Maintenance Requirements
Place barriers around and conduct runoff away from 100% of deicing chemical storage areas to prevent discharge into surface waters each	Annually, it will become more frequent if necessary	Visually inspect this measure to ensure it is being performed properly.
Track 100% of the application of deicing and anti-icing compounds in the MS4 area and record the amount of compound used for each application annually.	Annually, it will become more frequent if necessary	Update and review the spreadsheet to be updated on the compound usage.

## O&M Pollution Prevention Inspection: Log Sheet

Inspector Name:	
Inspection Date:	
Site Name:	
Site Address:	
Site Contact:	
Site Contact Information:	

**Have pollution prevention measures been properly implemented and maintained?**

Yes      **No (describe below)**

---

---

---

---

**Does the site comply with MS4 ordinances and other applicable regulations?**

Yes       **No (describe below)**

---

---

---

Is any additional action needed?    Yes (describe below)      No

---

## **Structural Control Maintenance Procedures: Instructions**

*TXR040000, Part IV, Section D.6.b.6*

### **Develop Structural Control Maintenance Procedures**

At least once annually, perform necessary maintenance on stormwater structural controls.

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

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

## **Structural Control Maintenance Procedures: Worksheet**

### **How frequently will structural controls be inspected?**

The structural controls will be inspected on a periodic basis. If the inspections indicate a more frequent inspection, then it will be changed.

### **How will structural controls be maintained?**

Structural controls will be maintained by having an annual maintenance of 100% of the structural controls. Maintenance will follow a plan and schedule set by the City to be consistent with maintaining the effectiveness.

Structural Control	Inspection Frequency	Maintenance Requirements
Pipes and Culverts	Annually	At least one time annually, perform maintenance of 100% of the structural controls.
Storm Sewer Inlets, Ditches	Annually	At least one time annually, perform maintenance of 100% of the structural controls.
Weirs, Channel Control Structures	Annually	At least one time annually, perform maintenance of 100% of the structural controls.
Outfalls	Annually	At least one time annually, perform maintenance of 100% of the structural controls.

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

*TXR040000, Part III*

## Includes

- Pollutant of Concern Benchmarks (see [page 76](#))
- Monitoring/Assessment Plan (see [page 77](#))

## Instructions

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

- Identify controls used on-site to target POCs.
- Set benchmarks and measurable goals.
- Develop a monitoring and assessment plan.

## Updates and Recordkeeping

Your annual reports will need to include:

- An analysis of how the selected activities and BMPs will be effective in achieving the benchmark value.
- Information on compliance with [Part III, Section B](#)<sup>14</sup> of the general permit (Discharges Directly to Water Quality Impaired Water Bodies Without an Approved TMDL), including the results of any sampling you conduct.

---

<sup>14</sup> [www.tceq.texas.gov/downloads/permitting/stormwater/general/ms4/2024-txr040000-general-permit-signed.pdf#page=30](http://www.tceq.texas.gov/downloads/permitting/stormwater/general/ms4/2024-txr040000-general-permit-signed.pdf#page=30)

## POC Benchmarks

*TXR040000, Part III, Section A.3*

### Identify benchmarks for your MS4's POCs

Benchmarks should be designed to determine if the established BMPs are effective in addressing the POCs in stormwater discharge(s) from the MS4 to the MEP. Refer to [TCEQ Water Quality Management Plans](#)<sup>15</sup> for updated TMDLs and Waste Load Allocations (WLA). If your small MS4 is subject to a TMDL that identifies a WLA for permitted MS4 stormwater sources, then identify this as your benchmark.

Identify your POC benchmarks in one of the following ways:

Year(s): 2026

Single MS4 Benchmark -

WLA: \_\_\_\_\_

Aggregate WLA: \_\_\_\_\_

Multiple MS4 Benchmark -

Aggregate WLA: \_\_\_\_\_

Sub-benchmark value: \_\_\_\_\_

---

15. [www.tceq.texas.gov/permitting/wqmp/WQmanagement\\_updates.html](http://www.tceq.texas.gov/permitting/wqmp/WQmanagement_updates.html)

## **Monitoring and Assessment Plan: Instructions**

*TXR040000, Part III, Section A.6-7*

### **Develop a Monitoring and Assessment Plan**

Assess progress meeting benchmarks and determine the effectiveness of your MS4's BMPs. Review whether the identified BMPs and measurable goals are appropriate.

You can assess progress towards set benchmarks by using program implementation indicators, such as:

- The number of sources identified or eliminated.
- A decrease in illegal dumping.
- An increase in illegal dumping reporting.
- The number of educational opportunities conducted.
- A reduction in sanitary sewer overflows.
- An increase in illegal discharges detected through dry screening.

You can assess improvements in water quality by:

- Using available data for segment and assessment units of water bodies from other reliable sources.
- Proposing and justifying a different approach such as collecting additional instream or outfall monitoring data, etc.
- Acquiring data from TCEQ, local river authorities, partnerships, and other local efforts as appropriate.

### **Identify alternative BMPs as needed**

If you observe no progress toward the benchmark from either SWMP implementation or water quality assessments by the end of the permit's third year, you will need to do one of the following:

- Identify alternative, focused BMPs that address new or increased efforts towards the benchmark.
- Develop a new approach to identify the most significant sources of the POC and develop alternative, focused BMPs for those sources.

## Monitoring/Assessment Plan: Worksheet

**How will your MS4 assess progress towards set benchmarks?** Choose one of the below options, then provide the requested information.

### ■ Evaluate Program Implementation Measures:

#### What are your program implementation indicators?

The City has multiple program implementation indicators to ensure the MS4 area is in compliance. The City will submit the annual reports in a timely manner to TCEQ. This will hold the City accountable to be in compliance with submitting reports, implementing the BMPs, and completing inspections. The City will ensure to monitor the stormwater quality data. Monitoring water quality trends based on the data can lead to the City identifying the issue early on. Implementing the program is essential to track the process and effectiveness of the BMPs. This includes public outreach, program documentation and reporting, stormwater system mapping and documentation, and illicit discharge detection and elimination.