



STORMWATER MANAGEMENT PROGRAM

Phase II MS4 No. TXR040000

Brushy Creek Municipal Utility District
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BRUSHY CREEK MUNICIPAL UTILITY DISTRICT

STORMWATER MANAGEMENT PROGRAM

Phase II MS4 No. TXR040000

Introduction

General:

Brushy Creek Municipal Utility District (District) has developed a Storm Water Management Program ("SWMP") as required for coverage under the Texas Pollutant Discharge Elimination System (TPDES) General Permit No. TXR040000. The SWMP describes the minimum control measures and Best Management Practices (BMPs) that will be implemented by the District in order to achieve the regulatory standard of reducing pollutants in the District's stormwater to the "maximum extent practicable." The District's goal is to maintain and improve the quality of surface and groundwater within the District's jurisdiction. This will be accomplished in part by:

1. Prevention of the discharge of contaminated stormwater runoff from commercial, residential, and construction sites.
2. Promote public awareness of potential hazards through educational opportunities at District events and school events.
3. Maintain compliance with state and federal water quality standards and regulations. This includes storm water discharges
4. Encourage recycling of hazardous products

Regulatory Background:

Brushy Creek Municipal Utility District (District) is a municipal separate storm sewer system (MS4). The District lies within the Austin, Texas urbanized area, as defined by the U.S. Census Bureau in the 2010 Decennial Census. The District is therefore required by Section 402 of the Clean Water Act and Chapter 26 of the Texas Water Code to obtain authorization for stormwater and certain non-stormwater discharges to surface water in the state. The District is eligible to obtain coverage under the TPDES General Permit No. TXR040000 (Permit) which was reissued on January 24, 2019. The District is required to submit a Stormwater Management Program (SWMP) and a Notice of Intent (NOI) to the TCEQ by July 23, 2019. An annual report must be submitted by the District to the TCEQ within 90 days of the end of each Permit year, which began on the date of Permit issuance. The first annual report will be due to the TCEQ on April 24, 2020.

To the extent allowable under state and local law, a SWMP must be developed and implemented according to the requirements of the TPDES Small MS4 General Permit TXR040000, for stormwater discharges that reach waters of the United States. The SWMP must be developed to reduce the discharge of pollutants from the MS4 to the maximum extent practicable (MEP), to protect water quality, and to satisfy the appropriate water quality requirements of the Clean Water Act and the Texas Water Code. Existing programs or best management practices (BMPs) may be used to fulfill the requirements of the Permit.

The SWMP must also set measurable goals and provide a schedule for the implementation of the BMPs. Various BMPs must be developed for each of the five minimum control measures (MCMs) that are required by the Phase II rule. The five required MCMs are:

- Public Education, Outreach and Involvement
- Illicit Discharge Detection and Elimination
- Construction Site Runoff Control
- Post-Construction Site Runoff Control

- Good Housekeeping/Pollution Prevention
-

The MS4 General Permit includes a sixth MCM that only applies to Level 4 MS4s. That is why it was not included. The permit also includes an optional seventh MCM that addresses stormwater from District construction activities. Brushy Creek has included MCM 7 but does feel it will be used.

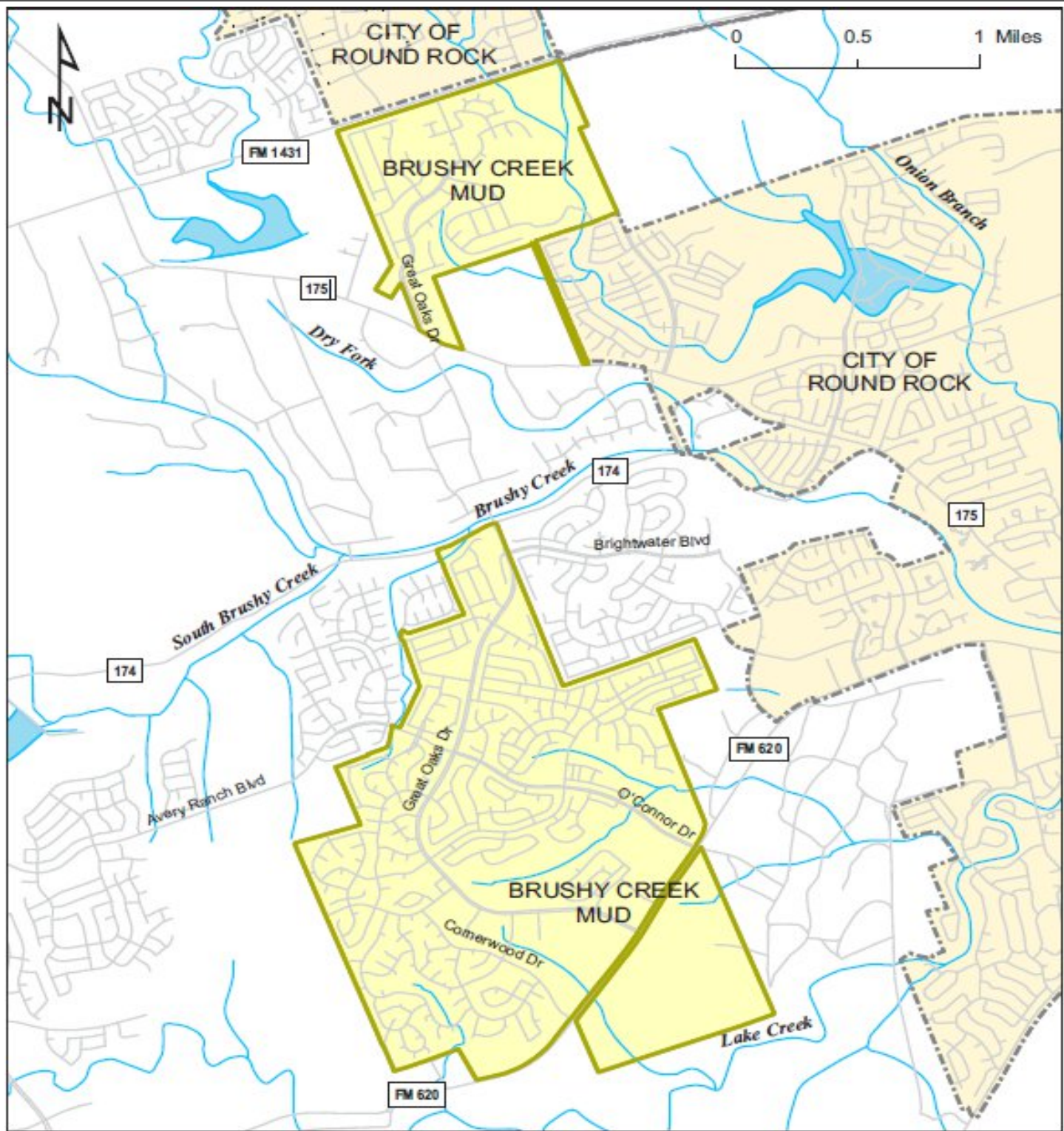
District Background:

Brushy Creek Municipal Utility District is a municipal utility district regulated by the TCEQ. The District provides water and wastewater services to its constituents, maintains drainage facilities, and owns and operates parks and recreational programs. The District has regulatory authority which differs somewhat from that of a City. The District is overseen by a Board of Directors.

Brushy Creek MUD is one of the largest MUDs in the region, with a population of over 20,000, but less than 40,000. This makes it a level 2 small MS4. The District consists of two general areas, which are not physically contiguous, and are separated by Brushy Creek. The District has a large number of parks, pools, trails, and a large community center. The District's water system consists of a distribution system and a microfiltration water treatment facility. The District receives its raw water from Lake Georgetown and from wells that pump water from the Edwards Aquifer. The wastewater system consists of the collection system, interceptors and seven lift stations. Wastewater from the District is treated regionally by the Brushy Creek Regional Waste Water System which is owned by the cities of Round Rock, Cedar Park and Austin. As of the date of adoption of this SWMP, there are no industrial Permits carried by the District. The District has recently reached 99% buildout.

Permit:

The District maintains a proactive stance when it comes to environmental issues. As a "Keep Texas Beautiful" affiliate, the District sponsors a regular event called *Keep Brushy Creek Beautiful*, intended to generate public participation to pick up and dispose of floatables, trash and debris from public land around waterways and parks. The District has a horticulturist on staff who oversees a large xeriscaped garden at the community center. The horticulturist also provides information to the general public regarding water-wise gardening as well as environmentally friendly pest and weed control. The District either hosts or is associated with many annual events throughout the District. The District takes these opportunities to distribute information concerning storm water, water conservation, and wastewater issues.



Brushy Creek Municipal Utility District - Vicinity Map

Discharges to the Edwards Aquifer Recharge Zone:

Discharges of stormwater from regulated small MS4s, and other non-stormwater discharges, cannot be authorized by the Permit where those discharges are prohibited by 30 TAC Chapter 213 (relating to Edwards Aquifer). New discharges located within the Edwards Aquifer Recharge Zone, or within that area upstream from the recharge zone and defined as the Contributing Zone, must meet all applicable requirements of, and operate according to, 30 TAC Chapter 213 (Edwards Aquifer Rule) in addition to the provisions and requirements of the Permit.

All applicable requirements of the Edwards Aquifer Rule for reductions of suspended solids in stormwater runoff are in addition to the effluent limitation requirements found in the Permit. A copy of the agency-approved Water Pollution Abatement Plans (WPAPs) that are required by the Edwards Aquifer Rule must either be attached as a part of the SWMP or referenced in the SWMP.

At the time of this submittal, the District does not have any active construction sites, and therefore no references to any WPAPs are included. There is ample discussion in this SWMP to show that the District has and will continue to comply with all components of the Edwards Aquifer Rule.

Discharges to Water Quality- Impaired Receiving Waters:

New sources or new discharges of the constituent(s) of concern to impaired waters are not authorized by the Permit unless otherwise allowable under 30 TAC Chapter 305 and applicable state law. Impaired waters are those that do not meet applicable water quality standard(s) and are listed on the Clean Water Act, 303(d) list. Constituents of concern are those for which the water body is listed as impaired.

Discharges of the constituent(s) of concern to impaired water bodies for which there is a TMDL implementation plan are not eligible for the Permit unless they are consistent with the approved TMDL and the implementation plan.

At the time of this submittal, Brushy Creek and Lake Creek, are the only receiving waters for the District's MS4. Brushy Creek is listed on the EPA approved Clean Water Act 303(d) list. It was first listed in 2006. Bacteria are the area of concern. The following BMPs help address the reduction of this impairment.

1.0 Public Education, Outreach and Involvement

- 2.2 Stormwater System Map
- 2.3 MS4 Outfall Screening
- 2.4 Sanitary Sewer Leak Elimination
- 2.5 Education and Training
- 2.6 Public Reporting of Illicit Discharges and Spills
- 2.7 Site Procedures for responding to Illicit discharges
- 2.8 Source Investigation and Elimination
- 5.7 Pet Waste Management

Public Participation:

As a District under the TCEQ General MS4 Permit, the District will comply with the following public notice procedures:

- a. The District will submit the NOI and a SWMP to the executive director of TCEQ.
- b. After the District receives written instructions from the TCEQ's Office of Chief Clerk, the District must publish notice of the executive director's preliminary determination on the NOI and SWMP.
- c. The notice must include:
 - 1. The legal name of the MS4 operator;

2. Identify whether the NOI is for a new small MS4 or is a renewal of an existing operation;
 3. The address of the District;
 4. A brief summary of the information included in the NOI, such as the general location of the small MS4 and a description of the classified receiving waters that receive the discharges from the small MS4;
 5. The location and mailing address where the public may provide comments to the TCEQ;
 6. The public location where copies of the NOI and SWMP, as well as the executive director's general Permit and fact sheet, may be reviewed; and
 7. If required by the executive director, the date, time, and location of the public meeting.
- d. The notice will be published at least once in the newspaper of largest circulation in the Williamson County, the county where the small MS4 is located. The notice shall provide opportunity for the public to submit comments on the NOI and SWMP. In addition, the notice shall allow the public to request a public meeting. A public meeting will be held if the TCEQ determines that there is significant public interest.
 - e. The public comment period begins on the first date the notice is published and ends 30 days later, unless a public meeting is held. If a public meeting is held, the comment period will end at the closing of the public meeting. The public may submit written comments to the TCEQ Office of Chief Clerk during the comment period detailing how the NOI or SWMP fails to meet the technical requirements or conditions of the Permit.
 - f. If significant public interest exists, the executive director will direct the District to publish a notice of the public meeting and to hold the public meeting. The District must publish notice of a public meeting at least 30 days before the meeting and hold the public meeting in Williamson County. TCEQ staff will facilitate the meeting.
 - g. If a public meeting is held, the District shall describe the contents of the NOI and SWMP. The District shall also provide maps and other data on the small MS4. The District shall provide a sign in sheet for attendees to register their names and addresses and furnish the sheet to the executive director. A public meeting held under the Permit is not an evidentiary proceeding.
 - h. The District must file with the Chief Clerk a copy and an affidavit of the publication of notice(s) within 60 days of receiving the written instructions from the Office of Chief Clerk.
 - i. The executive director, after considering public comment, shall approve, approve with conditions, or deny the NOI based on whether the NOI and SWMP meet the requirements of the Permit.
 - j. Persons whose names and addresses appear legibly on the sign in sheet from the public meeting and persons who submitted written comments to the TCEQ will be notified by the TCEQ's Office of Chief Clerk of the executive director's decision regarding the authorization.

SWMP Development:

The District hired URS to prepare the District's original SWMP. Subsequent updated SWMPs have been prepared by District staff. Staff has incorporated the changes made in the new Permit in this SWMP.

This SWMP has BMPs for five of the six of the MCMs specified in the General Permit. The sixth MCM that pertains to industrial sources applies only to Level 4 MS4s. Also included is the optional MCM #7. The SWMP will be implemented on an ongoing basis throughout the term of the General Permit. In general, evaluation of the success of each control measure will be through careful analysis of the measurable goals for each BMP included in the control measure. Measurable goals for each BMP were selected by formulating attainable goals

for the various BMP implementation tasks.

This document provides a clear plan for implementing stormwater management activities to protect the health of the public and the environment, meet Clean Water Act mandates through compliance with the Permit requirements and applicable regulations, and to foster heightened public education, awareness and involvement.

Resources and Funding

The District funds the activities associated with the Storm Water Management Plan through a monthly fee charged to each utility customer. The monthly fee of \$1.50 per living unit equivalent (LUE) per month generates approximately \$121,000 per fiscal year. This revenue supports one full time position in addition to other staff time for activities including but not limited to erosion control inspections, clean up events, educational material, and drainage system repairs.

CONTROL MEASURE NUMBER ONE

1.0 Public Education, Outreach and Involvement

The Public Education, Outreach and Involvement control measure consists of Best Management Practices (BMPs) that focus on the development and distribution of educational materials designed to inform the public about the impacts that stormwater discharges have on local water bodies, and the steps that the public can take to reduce pollutants in stormwater runoff. It also focuses on getting the Brushy Creek Community involved. The BMPs associated with public outreach and education describe how individuals, households and businesses will be informed about the steps they can take to reduce stormwater pollution; how individuals and groups will be informed on how to become involved in the stormwater program; and the mechanisms that will be used to reach target audiences.

The District currently sponsors several activities at which educational materials are distributed; for example, the Hairy Man Festival, the annual BBQ Cook-Off and the “Keep Brushy Creek Beautiful” stream clean-up event. Materials are made available at the Community Center and at the District’s utility billing offices. Information is also distributed through the District’s website, marquees that are located throughout the District and the District’s newsletter.

The District also has two annual stream and pond clean up days, an Arbor Day event, Texas Recycle Day and a Christmas tree recycling event. These events are a way to encourage conservation and help educate the District’s residents about environmental issues.

The target audiences for the education program are specified in education-related BMPs described in the control measures, and include residents in the permitted boundary, commercial property owners and businesses in the area, District employees, as well as consultants and contractors working in the community. There are no industrial facilities in the MS4’s permitted boundary, so no mention is made of any in the education-related BMPs.

The construction community is targeted by providing links to Federal and State regulations, and local construction guidelines, ordinances and regulations on the Stormwater Website. The District is surrounded by municipalities such as the City of Austin, the City of Round Rock and the City of Cedar Park, as well as Williamson County. Links can be added to the District’s website that will direct the construction community to any of those entities that provide basic stormwater education.

The target audiences for these BMPs were selected based on regulation requirements and based on the goal of educating the entire community about the impacts that stormwater discharges have on local water bodies and the steps that the public can take to reduce pollutants in stormwater runoff. The Public Education and Outreach program and BMPs, in combination, are expected to reach all of the constituents within the MS4’s permitted boundary.

The target pollutant sources are construction site runoff, impacts from new and re-development, illicit discharges and other pollutant sources as identified to be of local concern. Evaluation of the success of this control measure will be through careful analysis of the measurable goals for each BMP included in this control measure. Measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. The responsibility for implementation of this control measure is described with each BMP procedure.

Public education will also focus on the education of residents on the discharging of bacteria into the stormwater system. The focus will be on:

- Discharges from residential sites during run off events
- How fats, oils and greases may cause sanitary overflows
- Issues with decorative ponds
- Pet waste

BEST MANAGEMENT PRACTICES:

1.1 Stormwater Website:

The District has developed a website that includes information to educate the public about the impacts that stormwater runoff can have on water quality, and steps that they can take to reduce pollutants in stormwater runoff.

The target audience for this BMP includes all residents and commercial property owners and businesses in the permitted boundary, District employees, potential visitors to the area, as well as consultants and contractors working in the Permit area.

Implementation Tasks:

- 1.1.1 The District has developed a list of topics for inclusion and discussion on the stormwater website based on, but not limited to consideration of the following subjects:
 - Hazards of illicit discharge
 - Proper disposal of waste
 - Citizen reporting under illicit discharge and construction programs
 - Steps the public can take to reduce stormwater pollution
 - Public involvement programs
 - Construction guidelines, ordinances, regulations, and enforcement procedures
 - Construction plan review and site inspection procedures
 - Allowable BMPs that can be used within the Permit boundary to control erosion and sedimentation on construction sites, and for structural and non-structural post-construction runoff control
 - Links to other useful sites for additional information
- 1.1.2 Maintain the stormwater website on the internet for public access
- 1.1.3 Post new information on the website, such as the current SWMP and annual reports
- 1.1.4 Maintain records of website traffic using a hit counter.
- 1.1.5 Annually report on website traffic under this program.

Measurable Goals:

- Develop a list of topics for inclusion and discussion on the stormwater web page or website.
- Publish and maintain stormwater web page or website on the Internet for public access.

- Post new information on the web page or website

Responsible Party: Utility Systems Coordinator

1.2 Flyers, Brochures and/or Posters:

Distribute flyers, brochures, and/or posters for educating the public on stormwater quality issues. The target audience for this BMP includes all residents, visitors to the area, and commercial property owners and businesses in the permitted boundary. School-age children are targeted in BMP 1.6, Classroom Education on Stormwater. District employees are targeted in BMP 5.2, District Employee Education Program. The construction community is targeted in Control Measures 3.0 Construction Site Runoff, and 4.0 Post Construction Site Runoff. Additionally, information included in these educational materials will be reinforced with similar, complementary information provided on the District's Stormwater Website (BMP 1.1), Public Service Announcements (BMP 1.3), Public Education on Environmentally Friendly Gardening and the Proper use of Pesticides and Herbicides (BMP 1.4).

Implementation Tasks:

- 1.2.1 Maintain a list of topics for inclusion and discussion in the flyers, brochures and/or posters based on, but not limited to consideration of the following subjects:
 - Water quality impacts of stormwater runoff to local water bodies
 - Steps the public can take to reduce stormwater pollution
 - Impacts that specific commercial businesses can have on water quality and steps they can take to reduce stormwater pollution from their operations (i.e.: restaurants, car washes, automobile repair shops, etc.)
- 1.2.2 Acquire and make available material from EPA, State or other agencies or organizations.
- 1.2.3 Maintain a list of appropriate locations to place flyers, brochures and/or posters, and local functions at which to hand them out.
- 1.2.4 Maintain a record of the number of flyers, brochures and/or posters that are distributed under this program.

Measurable Goals:

- List of topics for inclusion and discussion in the flyers, brochures and/or posters
- Document the development or acquired available new material
- Document the amount of educational material distributed
- Post and distribute flyers, brochures and/or posters

Responsible Party: Utility System Coordinator

1.3 Public Service Announcements - Marquees and Newsletter:

Development and broadcasting of public service announcements on local marquees and in the monthly newsletter, designed to remind the public to protect their water resources.

The target audience for this BMP includes all residents in the permitted boundary, commercial property owners and businesses in the area, District employees, and visitors to the community.

Implementation Tasks:

- 1.3.1 Post public service announcements on marquees and in the monthly newsletter
- 1.3.2 Maintain a record of the number of times public service announcements are posted on marquees and in the newsletter.
- 1.3.3 Annually report on the number of times public service announcements are posted on marquees and in the monthly newsletters.

Measurable Goals:

- Document public service announcements on marquees and in the monthly newsletter in accordance
- Maintain accurate records for future use and annual reporting

Responsible Party: Utility Systems Coordinator

1.4 Public Education on Environmentally Friendly Gardening and the Proper use of Pesticides and Herbicides:

Continuation of a program to distribute public education materials that focuses on environmentally friendly gardening, and development of additional information to include regarding the proper use of pesticides and herbicides.

The target audience for this BMP includes all residents in the permitted boundary and District employees.

Implementation Tasks:

- 1.4.1 Continue current activities that focus on environmentally friendly gardening.
- 1.4.2 Maintain a list of topics for inclusion and discussion in educational material based on, but not limited to consideration of the following subjects:
 - Lawn and garden activities
 - Water conservation practices for homeowners
 - Proper use of pesticides and herbicides
- 1.4.3 Maintain a schedule to distribute educational material that is consistent with the implementation schedule of other BMPs included in the SWMP.
- 1.4.4 Distribute educational material in accordance with the identified plan and schedule.
- 1.4.5 Maintain a record of the educational material that is distributed under this program.

Measurable Goals:

- Continue current activities that focus on environmentally friendly gardening
- Maintain a list of topics for inclusion and discussion in educational material
- Implement the distribution of educational material in accordance with the identified plan and schedule
- Annually report the amount of educational material that is distributed under this program

Responsible Party: Utility Systems Coordinator

1.5 Classroom Education on Stormwater:

Continuation of educational activities for school age children designed to foster respect for the environment at an early age. The target audience for this BMP includes school age children in the community.

Implementation Tasks:

- 1.5.1 Continue educational activities provided at the recreation center and at school related functions for school age children that are designed to foster respect for the environment at an early age.
- 1.5.2 Maintain a list of topics and educational materials from EPA, State or other agencies or organizations, for inclusion and discussion in educational programs based on, but not limited to consideration of the following subjects:
 - General appreciation of nature and the environment
 - Water conservation
 - Water pollution/water quality
 - Things kids can do to help protect the environment
- 1.5.3 Develop a schedule to provide educational activities to school age children at the recreation center and/or at school related functions.
- 1.5.4 Implement educational programs in accordance with the identified schedule.
- 1.5.5 Maintain a record of the educational activities that are provided under this program, and the number of children that participate in each.

Measurable Goals:

- Maintain a program to provide educational activities to school age children at the recreation center and/or at school related functions
- Annually report the educational activities that are provided under this program, and the number of children that participate in each

Responsible Party: Utility Systems Coordinator

1.6 SWMP Committee:

The By-laws of the District's Water, Wastewater Committee were previously modified to include Stormwater. This Committee was actively involved the general public, commercial, construction and development communities, and District personnel in implementation of the SWMP. The Committee meets regularly, and is attended by District personnel, members of the Board of Director(s) and the public. Committee meetings are open meetings with a publicly posted agenda according to Open Meetings Act.

The target audience for this BMP includes all groups that may have an interest in the subject of stormwater and water quality.

Implementation Tasks:

- 1.6.1 Involve the Committee in the review of BMP's that are included, but not limited to, the following:
 - Public education materials
 - Local illicit discharge elimination regulations and investigation procedures
 - Local construction stormwater regulations, guidance materials, permitting procedures, and inspection procedures
 - Post-construction guidance and permitting information
 - Feedback on good housekeeping practices
- 1.6.2 Invite and appoint members of the public, commercial, construction and development communities, and MS4 personnel that are interested in the subject of stormwater management and may be affected by the various BMPs.
- 1.6.3 Develop a meeting schedule that correlates to required implementation dates for certain tasks.
- 1.6.4 Conduct regular scheduled Committee meetings in accordance with the developed schedule.
- 1.6.5 Maintain records of agenda, attendance, and minutes for each meeting.
- 1.6.6 Annually report on the number of meetings, the number of attendees at each meeting, and the subjects presented.

Measurable Goals:

- Maintain a list of BMPs which are included in the SWMP that would benefit by including local committee review
- Invite and appoint members of the public, commercial, construction and development communities, and MS4 personnel that are interested in the subject and may be affected by the various BMPs
- Report on a meeting schedule that correlate to required implementation dates for certain tasks
- Conduct SWMP Committee meetings in accordance with the developed schedule

Responsible Party: Utility Systems Coordinator

1.7 Storm Drain Stenciling:

Continuation of a program to label stormwater inlet structures with messages related to stormwater quality issues to increase awareness and to prevent illicit discharges into storm drains.

The target audience for this BMP includes residents, property and business owners, and public service groups.



Implementation Tasks:

- 1.7.1 Identify new areas or streets to be included in the storm drain stenciling program.
- 1.7.2 Identify groups that may be willing to participate in the storm drain stenciling program including, but not limited to consideration of the following groups:
 - Local Boy and Girl Scout organizations
 - Local school groups
 - Local fund-raising groups
 - Other civic organizations
- 1.7.3 Invite targeted groups to participate in the storm drain stenciling program.
- 1.7.4 Provide necessary support for volunteer storm drain stenciling groups, e.g. maps, appliqués, adhesive, traffic control, safety equipment, etc.
- 1.7.5 Implement storm drain stenciling program.
- 1.7.6 Maintain records of storm drain stenciling and volunteer participation.

Measurable Goals:

- Document target areas or streets to be included in the storm drain stenciling program
- Identify groups that may be willing to participate in the storm drain stenciling program
- Document necessary support for volunteer storm drain stenciling groups
- Implement storm drain stenciling program
- Annually report on number of storm drains stenciled and the volunteer groups who participated, if applicable

Responsible Party: Utility Systems Coordinator

1.8 Stream Clean-up Program:

Continuation of a program to utilize volunteers to clean up local surface water bodies and surrounding public property to collect trash, debris and other floatables. The target audience for this BMP includes residents, property and business owners and public service groups.

Implementation Tasks:

- 1.8.1 Designate program coordinators and contacts for interested parties who would like to participate in stream clean-up events.
- 1.8.2 Develop trash pick-up and disposal procedures for stream clean-up events, including safety precautions.
- 1.8.3 Develop a schedule for stream clean-up events.
- 1.8.4 Advertise and implement stream clean-up events according to identified schedule.
- 1.8.5 Provide adequate safety and disposal resources to volunteer groups at each scheduled stream clean-up event.

- 1.8.6 Maintain records of the number of stream clean-up events that occurred under this program and the number of participants at each event (estimated if necessary).

Measurable Goals:

- Document contacts of interested parties who would like to participate in stream clean-up events
- Implement trash pick-up and disposal procedures for stream clean-up events, including safety precautions
- Maintain a schedule for stream clean-up events
- Document advertisements for stream clean-up events according to identified schedule
- Provide adequate safety and disposal resources to volunteer groups at each scheduled stream clean-up event
- Annually report on the number of stream clean-up events that occurred under this program, and the number of participants at each event (estimated if necessary)

Responsible Party: Utility Systems Coordinator

1.0 Public Education, Outreach and Involvement

Implementation		
BMP	Measurable Goals	Years
Stormwater Website	Develop a list of topics for inclusion and discussion on the stormwater website Develop a schedule of implementation to publish and maintain the stormwater website Publish and maintain stormwater website on the internet for public access Post new information on the website	Annually
Flyers, Brochures and/or Posters	Develop a list of topics for inclusion and discussion in the flyers brochures, and/or posters Develop and acquire available material from EPA, State or other agencies or organizations Develop a list of locations to place flyers, brochures, and posters and local functions which to hand them out Post and Distribute flyers, brochures and/or posters	Monthly

Public Service Announcements Marquees and Newsletters	Post Public service announcements on marquees or in District newsletter Maintain a record of the number of times these announcements are posted Annually report the number of times these announcements are posted	Monthly
Public Education on Environmentally Friendly Gardening Proper Use of Pesticides and Herbicides	Sponsor activities that focus on Environmentally friendly gardening Maintain educational material that based on environmentally friendly gardening Distribute this material and record the amount of material that was distributed	Annually
Classroom Education on Stormwater	Continue educational activities provided at the recreation center and school related functions Maintain a list of topics and educational material from EPA, State, or other agencies or organizations Maintain a record of the activities	Annually
Stormwater Committee	Involve Committee in review of BMP's Invite and appoint members from the public Conduct regular meetings and maintain records Annually report on meeting specifics	Quarterly
Storm Drain Stencil	Identify areas for stenciling program Provide necessary support to these groups Implement program Maintain records of program	Annually
Clean Up Program		

CONTROL MEASURE TWO

2.0 Illicit Discharge Detection and Elimination

The Illicit Discharge Detection and Elimination control measure consists of Best Management Practices (BMPs) that focus on the detection and elimination of illicit discharges and/or connections into the MS4. The program must include a plan to detect and address non-stormwater discharges, including illegal dumping.

The BMPs address stormwater system map development and update procedures; the legal authority mechanism (to the extent allowable under State or local law) which will be used to effectively prohibit illicit discharges; enforcement procedures and actions to ensure that the regulatory mechanism is implemented and procedures for removing the source of the illicit discharge, including the removal of illicit connections to the MS4, if applicable.

A general list of allowable non-stormwater discharges that could be considered for exemption under this program are provided in BMP 2.1 Illicit Discharge Legal Authority. A more comprehensive list will be considered with that activity.

Maintain and update the stormwater system map that has been developed. Updates shall include the location of all outfalls, District-owned detention ponds, water quality ponds, and man-made drainage channels, as well as the names and location of all receiving waters and location of underground storm sewer pipes, inlets, culverts, drainage basins and other pertinent features will also be a part of the map. The District's Sanitary Sewer Leak Elimination Program, as required by the Edwards Aquifer Protection Program, will be continued with BMP 2.8.

BMPs focusing on education and training of District employees, businesses, and the general public with regard to the hazards associated with illegal discharges and improper disposal of waste are described in Control Measure 1.0, Public Education and Outreach. Education and training of District employees is described in this Control Measure as well as in BMP 5.2 District Employee Education Program.

Evaluation of the success of this control measure will be through careful analysis of the measurable goals for each BMP included in this control measure. Measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. The responsibility for implementation of this control measure is described with each BMP procedure.

The District does not have any on-site sewage disposal systems within the boundaries of its MS4.

BEST MANAGEMENT PRACTICES:

2.1 Illicit Discharge Legal Authority:

Maintain and modify, as needed, the District's enforcement authority to prohibit illicit discharges of non-stormwater to the MS4.

Implementation Tasks:

- 2.1.1 Involve the District's legal counsel in all stormwater issues involving interpretation of policy and law and implementation of enforcement authority.
- 2.1.2 Maintain a list of non-stormwater discharges that could be exempted from the general prohibitions and include appropriate language in the associated legal authority instrument. Discharges that are

currently allowable include:

1. Water line flushing (excluding discharges of hyper-chlorinated water, unless the water is first de-chlorinated, and discharges are not expected to adversely affect aquatic life);
2. Runoff or return flow from landscape irrigation, lawn irrigation, and other irrigation utilizing potable water, groundwater, or surface water sources;
3. Discharges from potable water sources;
4. Diverted stream flows;
5. Rising ground waters and springs;
6. Uncontaminated ground water infiltration;
7. Uncontaminated pumped ground water;
8. Foundation and footing drains;
9. Air conditioning condensation;
10. Water from crawl space pumps;
11. Individual residential vehicle washing;
12. Flows from wetlands and riparian habitats;
13. De-chlorinated swimming pool discharges;
14. Street wash water;
15. Discharges or flows from firefighting activities (firefighting activities do not include washing of trucks, run-off water from training activities, test water from fire suppression systems, and similar activities);
16. Other allowable non-stormwater discharges listed in 40 CFR ' 122.26(d)(2)(iv)(B)(1);
17. Non-stormwater discharges that are specifically listed in the TPDES Multi Sector General Permit (MSGP) or the TPDES Construction General Permit (CGP); and
18. Other similar occasional incidental non-stormwater discharges, unless the TCEQ develops permits or regulations addressing these discharges.

2.1.3 Develop educational materials to inform the public and the commercial community on the prohibition of non-stormwater discharges to the MS4, including enforcement procedures.

2.1.4 Distribute educational materials to the public and the commercial community regarding the prohibition of non-stormwater discharges to the MS4.

2.1.5 Implement all applicable regulations and enforcement procedures regarding the prohibition of illicit discharge.

2.1.6 Maintain records of any changes made to existing regulations/ordinances to prohibit illicit discharges of non-stormwater (except those identified as allowable) to the MS4, including enforcement capabilities.

Measurable Goals:

- Implement all applicable regulations and enforcement procedures regarding the prohibition of illicit discharges
- Maintain records of any changes to existing regulations
- Report annually on any changes made to existing regulations

Responsible Party: Utility Systems Coordinator

2.2 Stormwater System Map:

Maintain and update a map of the MS4 indicating the location of stormwater outfalls and other pertinent stormwater features.

Implementation Tasks:

2.2.1 Maintain and update a map of the MS4 stormwater system, including the location of the following:

- Permit coverage area boundary
- MS4 receiving stream(s)
- Stormwater outfalls
- District-owned ponds and channels
- Potential sources for bacterial contamination
- Drainage basins

2.2.2 Maintain records of any changes made to the stormwater system map.

2.2.3 Annually report on the number of new outfall locations identified under this program.

Measurable Goals:

- Documentation of updates to the stormwater system map
- Records kept of changes made
- Reports filed annually

Responsible Party: Utility Systems Coordinator

2.3 Education and Training

Implementation of a method to inform and train all District field staff that may come in contact with or otherwise observe an illicit discharge or illicit connection.

Implementation Tasks:

2.3.1 Provide information and training for District field staff that will aid in their ability to identify illicit discharges and connections.

2.3.2 Retain a list of training material used and a list of those who attend the training.

2.3.3 Have training records and material readily available for review by TCEQ.

Measurable Goals:

- Training will be provided to field staff
- Records will be retained to report on type of training and those attending

Responsible Party: Utility Systems Coordinator

2.4 Public Reporting of Illicit Discharges and Spills

Publicize and facilitate public reporting of any known illicit discharges and/or water quality impacts associated with discharges into or from the small MS4.

Implementation Tasks:

- 2.4.1 Publish reports of illicit discharges and/or water quality impacts through:
- The website
 - Door hangers
 - Newsletter
 - E mail blasts
- 2.4.2 Provide a phone number for complaints and spill reporting.
- 2.4.3 Provide information in an annual report of any illicit discharges.

Measurable Goals:

- Accumulation of data concerning published reports of illicit discharges within the District
- Accumulation of data concerning complaints and spill notifications

Responsible Party: Utility Systems Coordinator

2.5 Site Procedures for responding to Illicit discharges

Develop and maintain on site procedures for responding to illicit discharges and spills.

Implementation Tasks:

- 2.5.1 Develop standard operating procedures for responding to illicit discharges.
- 2.5.2 Provide training to District personnel on the standard operating procedures.
- 2.5.3 Update procedures as necessary.

Measurable Goals:

- Standard Operating Procedures will be developed
- Training will be conducted
- Records will be maintained

Responsible Party: Utility Systems Coordinator

2.6 Source Investigation and Elimination

Identify, investigate, and eliminate sources of Illicit Discharges.

Implementation Tasks:

- 2.6.1 Investigate to identify and locate the source of illicit discharges as soon as practicable.
- 2.6.1. a. Prioritize by risk of pollution.
- 2.6.1. b. Report to TCEQ if the discharge is believed to be an immediate threat to human health or the

environment.

2.6.1. c. Track all investigations and document, at a minimum:

- i. The date the illicit discharge was observed
- ii. The results of the investigation
- iii. Any follow up investigation
- iv. The date the investigation was closed

2.6.2 If the discharge extends outside the boundaries of the MS4, notify the adjacent MS4 or TCEQ.

2.6.3 Require that corrective measures are taken to eliminate the illicit discharge.

Measurable Goals:

- Investigation and identification of possible illicit discharges
- Implement corrective measures taken to eliminate the discharge
- Conduct follow up inspections conducted
- Notify TCEQ
- Document all pertinent information pertaining to the investigation

Responsible Party: Utility Systems Coordinator

2.7 Inspections

Conduct inspections in response to complaints and follow up to ensure corrective measures have been taken

Implementation Tasks:

- 2.7.1 Investigate any complaints
- 2.7.2 Implement corrective measures
- 2.7.3 Follow up to ensure issue has been properly addressed
- 2.7.4 Complete necessary documentation for the event

Measurable Goals:

- Investigate Complaints
- Document corrective actions
- Develop written procedures

Responsible Party: Utility Systems Coordinator

2.8 Sanitary Sewer Leak Elimination:

Continuation of a program to identify and schedule the elimination of sanitary sewer leaks and/or illicit connections to the MS4 through the current activities required by the Edwards Aquifer Program.

Implementation Tasks:

- 2.8.1 Maintain and update the existing sanitary sewer system map of the area within the regulated MS4 boundary.
- 2.8.2 Continue to train inspection personnel on the identification, tracking, and reporting of sanitary sewer system leaks.
- 2.8.3 Continue tracing sanitary sewer leaks as mandated by the Edwards Aquifer Program.
- 2.8.4 Coordinate the identification of sanitary sewer system leaks with the MS4 screening and inspection program.
- 2.8.5 Continue to conduct necessary sewer system repairs to eliminate sanitary sewer leaks that discharge to the MS4, as mandated by the Edwards Aquifer Program.
- 2.8.6 Continue to maintain records of the number of sanitary sewer systems leaks identified and eliminated under this program, as mandated by the Edwards Aquifer Program.
- 2.8.7 Annually report on the number of sanitary sewer systems leaks identified and eliminated under this program.

Measurable Goals:

- Maintain the existing sanitary sewer system map of the area within the regulated MS4 boundary
- Document training for inspection personnel on the identification, tracking, and reporting of sanitary sewer system leaks
- Continue tracking sanitary sewer leaks as mandated by the Edwards Aquifer Program
- Coordinate the identification of sanitary sewer system leaks with the MS4 screening and inspection program
- Continue to conduct necessary sewer system repairs to eliminate sanitary sewer leaks that discharge to the MS4

Responsible Party: Utility Systems Coordinator

2.0 Illicit Discharge Detection and Elimination

BMP	Measurable Goals	Implementation Years
Illicit Discharge Program Development	Involve District's legal counsel in all stormwater issues involving interpretation and enforcement Maintain a list of non-stormwater discharges Develop material in regard to prohibition of Distribute material to the public	Annually

	Implement all applicable regulations and enforcement procedures Maintain records in IDDE regulation changes	
Stormwater System Map	Maintain and update a map of the MS4 indicating the location of outfalls and other pertinent features Maintain records of any changes to the map Annually report of the number of new outfall locations identified under this program	Annually
Public Reporting of IDDE and Spills	Accumulation of data concerning published reports of illicit discharges within the District Accumulation of data concerning complaints and spill notifications	Annually
Site Procedures for Responding	SOPs will be developed Conduct training	Annually
Source Investigation and Elimination	Investigation and identification of possible illicit discharges within the District Implement corrective measures taken to eliminate the discharge Conduct follow up inspections Notify TCEQ	As reported/observed by District staff or general public

Sanitary Sewer Leak Elimination	Maintain the existing sanitary sewer map of the area within the regulated MS4 boundary Continue tracking sanitary sewer leaks mandated by the Edwards Aquifer Program Coordinate the identification of sanitary sewer system leaks with the MS4 screening and inspection program Continue to conduct necessary sewer system filming and repairs. This includes sewer mains and manholes	Annually
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CONTROL MEASURE NUMBER THREE

3.0 Construction Site Stormwater Runoff Control

The Construction Site Runoff Control measure consists of Best Management Practices (BMPs) that focus on the reduction of pollutants in any stormwater runoff to the MS4 from construction activities that result in a land disturbance of one acre or greater. Reduction of stormwater discharges from construction activity disturbing less than one acre will be considered if it is part of a larger common plan of development or sale that would disturb one acre or more. The BMPs describe the legal authority mechanism (to the extent allowable under State or local law) which will be used to require erosion and sediment controls; enforcement procedures and actions to ensure compliance; requirements for construction site operators to implement appropriate erosion and sediment control BMPs; requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter and sanitary waste at the construction site; procedures for site plan review which incorporate the consideration of potential water quality impacts; procedures for receipt and consideration of information submitted by the public; and procedures for site inspection and enforcement of control measures.

Evaluation of the success of this control measure will be through careful analysis of the measurable goals for each BMP included in this control measure. Measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. The responsibility for implementation of this control measure is described with each BMP procedure.

BEST MANAGEMENT PRACTICES:

3.1 Construction Site Runoff Legal Authority:

Enforcing the District's legal authority to regulate local construction site runoff through a construction plan review and inspection program.

Implementation Tasks:

3.1.1 Identify any unique construction related stormwater quality issues that may require regulation, including

consideration of the following:
Edwards Aquifer Recharge Zone
Critical habitats and endangered species
Wetland protection
Other environmentally sensitive areas

- 3.1.2 Adopt regulations necessary to control stormwater runoff from construction sites based on identified regulatory issues.
- 3.1.3 Enforce the regulations as appropriate to regulate stormwater discharges into the MS4 from local construction sites.
- 3.1.4 Maintain records of any changes made to existing regulations to regulate local construction site runoff.
- 3.1.5 Annually report on any changes made to existing regulations to regulate local construction site runoff.

Measurable Goals:

- Identify any unique construction related stormwater quality issues that may require regulation
- Adopt and enforce regulations necessary to control stormwater runoff from construction sites based on identified regulatory issues
- Research existing legal authority available for the regulation and enforcement of construction site operators
- Provide notification to the local development and construction community of the adopted local construction site runoff regulations and enforcement procedures
- Enforce the regulations as appropriate to regulate stormwater discharges from local construction sites

Responsible Party: Utility Systems Coordinator

3.2 Construction Plan Review:

Continue the program of review of construction plans, focusing on compliance with local construction site runoff regulations.

Implementation Tasks:

- 3.2.1 Continue a program to obtain construction plans for review to determine compliance with local construction stormwater regulations.
- 3.2.2 Maintain internal tracking system including addressing information submitted by the public. Maintain plan review procedures to ensure that the following issues are properly addressed:
 - Conformance to local stormwater regulations
 - Appropriate use of temporary erosion/sedimentation controls
 - Appropriate control of other construction related wastes
 - Adequate site stabilization before and after construction
 - Inclusion of any required local, state, and/or federal stormwater permit documents, including the TPDES General Construction Permit and permitting required under the Edwards Aquifer Protection Program

- 3.2.3 Train District construction plan review personnel on local construction stormwater regulations and plan review procedures.
- 3.2.4 Inform the local development and construction community (contractors, developers, engineers, architects) of any changes in the construction plans review process.
- 3.2.5 Review construction plans for local construction sites to ensure compliance with the most current local regulations.
- 3.2.6 Maintain records of all construction plans that are reviewed, approved for construction, and rejected under this program.
- 3.2.7 Annually report on the number of plans reviewed, approved for construction, and rejected under this program.

Measurable Goals:

- Obtain construction plans for review to determine compliance with local construction stormwater regulations
- Develop internal tracking and plan review procedures to ensure that construction site runoff issues are properly addressed
- Train District construction plan review personnel on local construction stormwater regulations and plan review procedures
- Inform the local development and construction community (contractors, developers, engineers, architects) of any changes in the construction plans review process.
- Implement the construction plans review procedures for local construction sites to ensure compliance with the most current local regulations.

Responsible Party: Utility Systems Coordinator

3.3 Construction Site Inspection:

Continuation of a program to conduct inspections of local construction sites that discharge stormwater to the MS4, focusing on compliance with local construction site runoff regulations.

Implementation Tasks:

- 3.3.1 Continue a program to inspect construction sites within the Permit boundary for compliance with local construction stormwater regulations.
- 3.3.2 Maintain internal procedures for tracking and inspecting new and on-going construction activities including from information submitted by the public that ensure the following issues are properly addressed:
 - Conformance to local stormwater regulations
 - Appropriate use of erosion control
 - Appropriate control of related wastes
 - Adequate site stabilization during and upon completion of construction
 - Possession of any required local, state, and/or federal stormwater permit documents, including the TPDES General Construction Permit and permitting required under the Edwards Aquifer Protection Program

- 3.3.3 Train District inspection personnel on local construction stormwater regulations and inspection procedures.
- 3.3.4 Maintain records of all construction site inspections, enforcement actions, and corrective actions performed by local construction site owners and operators under this program.
- 3.3.5 Annually report the number of construction site inspections performed, the number of enforcement actions taken, and the number of corrective actions performed by local construction site owners and operators under this program.

Measurable Goals:

- Continue a program to inspect qualifying construction sites within the Permit boundary for compliance with construction stormwater regulations
- Maintain internal procedures for tracking and inspecting new and on-going construction activities to ensure that construction site runoff issues are properly addressed
- Train District inspection personnel on local construction stormwater regulations and inspection procedures
- Ensure construction site compliance with the most current local regulations
- Issue enforcement actions to owners and operators of local construction sites that are not in compliance with local construction stormwater regulations

Responsible Party: Utility Systems Coordinator

3.0 Construction Site Stormwater Runoff Control

BMP	Measurable Goals	Implementation Years
Construction Site Runoff Legal Authority	Identify any unique construction related stormwater quality issues that may require regulation Adopt and enforce regulations necessary to control stormwater runoff from construction sites Provide notification to the development/construction community of the regulations and enforcement	Annually
Construction Plan Review	Obtain construction plans for review to determine compliance with stormwater regulations Develop internal tracking and plan review procedures to ensure that construction site runoff issues are properly addressed Train District plan review personnel on regulations and plan review procedures Inform the local development and construction community any changes in the review process	As construction permits are requested from the District

Construction Site Inspection	Maintain internal procedures for tracking and inspecting new and ongoing construction to ensure site runoff is addressed Train District personnel on stormwater regulations and procedures Ensure construction site compliance with the most Issue enforcement actions to operators that are not in compliance	Weekly
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CONTROL MEASURE FOUR

4.0 Post-Construction Stormwater Management in New Development and Redevelopment

The Post-Construction Stormwater Management control measure consists of Best Management Practices (BMPs) that focus on the prevention or minimization of water quality impacts from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale that discharge into the MS4. The BMPs describe structural and/or non-structural practices; the legal authority mechanism (to the extent allowable under State or local law) which will be used to address post-construction runoff from new development and redevelopment projects; and procedures to ensure long term operation and maintenance of structural BMPs.

The District's final boundaries have been defined and the District is over 98% built out. There will not be any subdivisions being built in the future. The remaining lots are small commercial lots and some individual residential lots. Little opportunity exists for the use of Low Impact Design (LID) techniques within the Permit area.

Evaluation of the success of this control measure will be through careful analysis of the measurable goals for each BMP included in this control measure. Measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. The responsibility for implementation of this control measure is described with each BMP procedure.

BEST MANAGEMENT PRACTICES:

4.1 Post-Construction Runoff Legal Authority:

Enforcement of legal authority to require and regulate post-construction control measures and long-term maintenance of structural control measures in areas of new and redevelopment.

Implementation Tasks:

- 4.1.1 Maintain a list of local development stormwater quality related issues that require regulation including:
- Use of structural and/or non-structural control to assure retention of pre-development runoff

characteristics

- Protection of sensitive water bodies
- Open space and landscaping requirements
- Assurances of long term operation and maintenance of structural control measures

- 4.1.2 Enforce regulations necessary to regulate structural and non-structural post-construction control measures and long term maintenance of structural control measures in areas of new and redevelopment based on identified regulatory issues, including a list of acceptable structural and non-structural controls for use in the Permit area.
- 4.1.3 Notify the local development and construction community of any changes to the adopted post-construction runoff regulations and enforcement procedures.
- 4.1.4 Enforce the regulations as appropriate to regulate post-construction runoff from new and redevelopment projects.
- 4.1.5 Maintain records of any changes made to existing regulations to regulate local post construction runoff from new development and re-development.
- 4.1.6 Annually report on any changes made to existing regulations to regulate local post construction runoff from new development and re-development.

Measurable Goals:

- Maintain and update a list of local development stormwater quality related issues that require regulation
- Communicate guidelines necessary to control structural and non-structural post-construction runoff from new development and re-development based on identified regulatory issues
- Maintain and update, when necessary, supplemental legal authority through resolution, or other policy related legal powers to require and regulate structural and non-structural post-construction control measures and long term maintenance of structural control measures in areas of new and redevelopment, including enforcement capabilities
- Enforce the post-construction runoff regulations as appropriate to regulate runoff from new and re-development projects

Responsible Party: Utility Systems Coordinator

4.2 New Development and Re-development Plan Review:

Continuation of a process to review development and re-development plans to ensure compliance with local post-construction runoff regulations

Implementation Tasks:

- 4.2.1 Continue a program to obtain development construction plans for review to determine compliance with local post-construction runoff regulations.
- 4.2.2 Ensure that the following issues are properly addressed during plan review:
- Use of structural and/or non-structural control to assure retention of pre-development runoff characteristics
 - Protection of sensitive water bodies

- Open space and landscaping requirements
 - Post-construction control measures or certification of no adverse impact to hydrological regime or water quality of receiving stream(s) due to local conditions, off-site drainage features, topography, or any other verifiable characteristics
 - Assurances of long term operation and maintenance of structural control measures
- 4.2.3 Inform the local development and construction community (contractors, developers, engineers, architects) of any changes in the construction plan review process.
- 4.2.4 Continue the implementation of the construction plan review procedures for local development and re-development projects to ensure compliance with the most current local regulations.
- 4.2.5 Maintain records of all new development and re-development plans reviewed, approved for construction, and rejected under this program.
- 4.2.6 Annually report on the number of new development and re-development plans reviewed, approved for construction, and rejected under this program.

Measurable Goals:

- Continue a program to obtain development construction plans for review to determine compliance with local post-construction runoff regulations
- Develop internal tracking and plan review procedures to ensure that the developer has an opportunity to provide feedback and to appeal during the decision-making process, and that post-construction runoff issues are properly addressed
- Inform the local development and construction community (contractors, developers, engineers, architects) of any changes in the construction plan review process

Responsible Party: Utility Systems Coordinator

4.3 New Development and Re-development Project Inspection:

Continuation of a process to conduct inspections of local new development and re-development projects to ensure conformance to approved plans and proper long-term maintenance of structural controls.

Implementation Tasks:

- 4.3.1 Continue a program to inspect qualifying new development and re-development projects during construction for conformance to approved construction plans.
- 4.3.2 Tracking and inspecting new development and re-development projects that are under construction, for conformance to approved construction plans, and that have been completed, for proper maintenance.
- 4.3.3 Issue enforcement actions to owners or operators of local development projects that are not in compliance with local post-construction runoff regulations by not conforming to approved construction plans, or by not properly maintaining structural controls.
- 4.3.4 Maintain records of development project site inspections, enforcement actions, and corrective actions performed by local development project owners.
- 4.3.5 Annually report on the number of development project sites inspected, the number of enforcement actions taken, and the number of corrective actions performed by local development project owners.

Measurable Goals:

- Inspect qualifying new development and re-development projects during construction for conformance to approved construction plans
- Keep records of the inspecting of new development and re-development projects that are under construction, for conformance to approved construction plans, and that have been completed, for proper maintenance
- Implement the inspection procedures for local new development and re-development projects to ensure compliance with the most current local regulations
- Issue enforcement actions to owners or operators of local development projects that are not in compliance with local post-construction runoff regulations by not conforming to approved construction plans, or by not properly maintaining structural controls

Responsible Party: Utility Systems Coordinator

4.0 Post Construction Stormwater Management in New Development and Redevelopment

BMP	Measurable Goals	Implementation Years
Post Construction Runoff Legal Authority	Maintain and update a list of local development stormwater quality related issues that require regulation	Annually
	Communicate guidelines necessary to control structural and nonstructural post construction runoff based on regulatory issues	
	Maintain and update the District's legal authority	
Construction Plan Review	Obtain construction plans for review to determine compliance Develop internal tracking and plan review procedures to ensure that construction site runoff issues are properly addressed	Annually
Construction Site Inspections	Inspect projects for approved plan conformance Keep records of inspections	Bi-weekly

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CONTROL MEASURE NUMBER FIVE

5.0 Pollution Prevention and Good Housekeeping for District Operations

The Good Housekeeping/Pollution Prevention control measure consists of Best Management Practices (BMPs) that focus on the prevention or reduction of pollutant runoff from District operations. The BMPs describe the use of training materials available from the EPA, the State, or other organizations, methods that will be utilized to reduce pollutants from entering the MS4 from District-owned operations, including an assessment of all District-owned facilities within the Permit boundary to determine practices that can be implemented at each facility to reduce pollutants from entering the MS4. BMPs also include development and implementation of Spill Prevention Control and Countermeasures Plans for each applicable District-owned facility, the continuation and enhancement of District pet waste management program.. A general list of the District’s facilities is included, while a more detailed inventory will be developed as part of BMP 5.1 District-Owned Facilities. Specific issues such as proper disposal of waste will be addressed with each site assessment. For example, District operations within drainage facilities may include dredging of spoils, accumulated sediment, floatables and other debris, and a plan will be put in place to ensure the proper disposal of such waste materials.

Highways, streets and associated inlets within the Permit boundary are owned and maintained by Williamson County and are therefore not mentioned in these BMPs. Stormwater runoff management of District-owned construction sites and maintenance procedures for District-owned structural BMPs are discussed in those corresponding BMPs (5.1 District-Owned Construction Sites, and 4.3 New District-Owned Development and Re-Development Projects).

Evaluation of the success of this control measure will be through careful analysis of the measurable goals for each BMP included in this control measure. Measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. The responsibility for implementation of this control measure is described with each BMP procedure.

BEST MANAGEMENT PRACTICES:

5.1 District-Owned Facilities:

Assessment of District-owned property, in an effort to maintain the plan of pollutant reduction within the District’s MS4 boundaries. The following is a list of all District-owned facilities within the Permit boundary:

- Community Center/Administrative Offices
- Maintenance yard
- Water Treatment Facility
- Groundwater Pumping Facilities
- Water Storage Facilities
- Wastewater Lift Stations
- Parks and Swimming Pools
- Drainage Facilities (detention ponds, water quality ponds, drainage channels, etc.)
- Vacant Lots

Implementation Tasks:

- 5.1.1 Maintain and update an inventory of all District-owned property within the MS4 Permit boundary. This will include the type of facility, a general description of the activities that occur on the property, and the approximate size of the site.
- 5.1.2 Assess each site to determine if any permits are required to comply with Stormwater, Edwards Aquifer Program, Industrial or other State or Federal regulations (environmental).
- 5.1.3 Comply with all applicable Permit requirements at all qualifying facilities.
- 5.1.4 Assess each site for opportunities to implement alternative practices or to add BMPs to reduce or eliminate pollutant discharge into the MS4 due to District activities, including proper disposal of waste.
- 5.1.5 Develop a prioritized list of sites where alternative practices or added BMPs on District-owned property within the Permit boundary could reduce or eliminate pollutant discharge into the MS4 due to District activities.
- 5.1.6 Continue the program to reduce pollutant discharge from District activities on District-owned property within the Permit boundary based on the prioritized list.
- 5.1.7 Maintain records of the number of District-owned facilities that require a State or Federal permit (environmental) and the current Permit compliance status. Also record any project that is designed to reduce or eliminate the discharge of pollutants into the MS4 from District activities on District-owned property within the Permit boundary.
- 5.1.8 Annually report on the number of District-owned facilities that require any type of environmentally related Permit and the current Permit compliance status. Also report on the status of any project that is designed to reduce or eliminate the discharge of pollutants into the MS4 from District activities on District-owned property within the Permit boundary.

Measurable Goals:

- Maintain and update an inventory of all District-owned property within the MS4 Permit boundary
- Assess each site to determine if any permits are required to comply with Stormwater, Edwards Aquifer Program, Industrial or other State or Federal regulations (environmental)
- Comply with all applicable Permit requirements at all qualifying facilities
- Assess each site for opportunities to implement alternative practices or to add BMPs to reduce or eliminate pollutant discharge into the MS4 due to District activities
- Maintain a list of sites where alternative practices or added BMPs on District-owned property within the Permit boundary could reduce or eliminate pollutant discharge into the MS4 due to District activities
- Implement a program to reduce pollutant discharge from District activities on District-owned property within the Permit boundary based on the prioritized list

Responsible Party: Utility Systems Coordinator

5.2 District Employee Education Program:

Development and implementation of an education program for the purpose of educating District employees on stormwater quality issues and measures that they can take to prevent pollutants from entering the MS4 from District-owned facilities. The target audience for this BMP includes all District employees, especially those involved in activities that can be potentially harmful to the environment.

Implementation Tasks:

- 5.2.1 Develop a list of topics for inclusion and discussion in the District employee education program based on, but not limited to consideration of the following subjects:
 - Water quality impacts of stormwater runoff to local water bodies
 - Impacts that specific District activities can have on water quality (i.e. pesticide and herbicide application, vehicle maintenance, waste disposal, landscaping and lawn care activities, etc.)
 - Steps the District employees can take to reduce stormwater pollution
- 5.2.2 Make available material from EPA, State or other agencies or organizations, or utilize educational events offered by these entities.
- 5.2.3 Provide training opportunities for all employees.
- 5.2.4 Maintain a record of the number of employees that receive training under this program.
- 5.2.3 Annually report the number of employees that receive training under this program.

Measurable Goals:

- Develop a list of topics for inclusion and discussion in the District Employee Education Program
- Develop or acquire available material from EPA, State or other agencies or organizations, or utilize educational events offered by these entities
- Schedule training opportunities for employees that will benefit most from each subject matter

Responsible Party: Utility Systems Coordinator

5.3 Spill Prevention Plans:

Continuation of compliance with federal spill prevention control and counter measures plan regulations, and development of a program to review spill response procedures to ensure stormwater quality protection.

Implementation Tasks:

- 5.3.1 Maintain and update an inventory of District-owned facilities that may be required to have Spill Prevention Control and Countermeasures Plans (SPCC Plans).
- 5.3.2 Evaluate identified facilities and determine if SPCC Plans are required.
- 5.3.3 Develop and/or maintain SPCC plans for District-owned facilities that require plans.
- 5.3.4 Comply with SPCC plan requirements at qualifying District-owned facilities, including consideration of the following:
 - Conduct employee training
 - Maintain spill prevention equipment
 - Maintain SPCC records
 - Update and re-certify the SPCC plan according to SPCC regulations
- 5.3.5 Maintain records of the number of facilities with SPCC plans and the current status of each SPCC plan.
- 5.3.6 Annually report on the number of facilities with SPCC plans and the current status of each SPCC plan.

Measurable Goals:

- Inventory of District-owned facilities that may be required to have Spill Prevention Control and Countermeasures Plans (SPCC) is maintained and updated
- Evaluate identified facilities and determine if SPCC Plans are required
- Develop and/or maintain SPCC Plans for District-owned facilities that require plans
- Comply with SPCC plan requirements at qualifying District-owned facilities

Responsible Party: Utility Systems Coordinator

5.4 Contractors Requirements and Oversight

The District shall provide oversight of the contractor activities to ensure that proper control measures and SOPs are being used.

Implementation Tasks:

- 5.4.1 Communicate with all contractors performing maintenance on District property that they are contractually obligated to work within the District's stormwater procedures set forth in the District's SWMP.
- 5.4.2 Develop and maintain contractor oversight and control measures.
- 5.4.3 Inspect construction sites periodically to ensure measures are being followed.
- 5.4.4 Keep record of any inspections and the results of those inspections
- 5.4.5 Annually report the results of those inspections

Measurable Goals

- Control measures are maintained
- Control measures are given to contractors
- Records are kept

5.5 Municipal Operations and Maintenance Activities

The District will assess their operations and maintenance practices, identify pollutants of concern, develop and implement a set of pollution prevention measures to reduce the discharge of pollutants in stormwater and perform pollution prevention inspection measures

Implementation Tasks:

- 5.5.1 Perform District operations and facility surveys
- 5.5.2 Develop procedures to implement stormwater practices
- 5.5.3 Identify possible stormwater pollutants
- 5.5.4 Record and report any issues found

Measurable Goals

- Facilities surveyed
- Report number of facilities surveyed
- Develop procedures that coincide with the implementation of stormwater practices

Responsible Party: Utility Systems Coordinator

5.6 Pet Waste Management:

Continuation of a program to provide and maintain Pet Waste Stations (bag-dispensing and disposal center) at designated District-owned parks and trails, and identification of locations at which new stations can be added.

Implementation Tasks:

- 5.6.1 Continue to provide and maintain Pet Waste Stations (bag-dispensing and disposal center) at designated District-owned parks and trails.
- 5.6.2 Identify new locations at which stations can be added.
- 5.6.3 Maintain pet waste stations that have been installed.
- 5.6.4 Implement a program to add Pet Waste Stations at additional District-owned facilities based on the prioritized list.
- 5.6.5 Maintain records of the number of Pet Waste Stations at District-owned facilities within the Permit boundary, recording any new stations that are added.
- 5.6.6 Annually report the number of Pet Waste Stations at District-owned facilities within the Permit boundary, noting any new stations that are added.

Measurable Goals:

- Continue to provide and maintain Pet Waste Stations (bag-dispensing and disposal center) at designated District-owned parks and trails
- Identify new locations at which stations can be added
- Develop a prioritized list of District-owned facilities where Pet Waste Stations can be added
- Implement a program to add Pet Waste Stations at additional District-owned facilities based on the prioritized list

Responsible Party: Utility Systems Coordinator

5.0 Pollution Prevention and Good Housekeeping for District Operations

BMP	Measurable Goals	Implementation Years
District Owned Facilities	Maintain and update an inventory of all District owned property within the MS4 boundary Assess each site to determine if any permits are required to comply with stormwater, Edwards Aquifer Program, Industrial or other State or Federal requirements Comply with applicable Permit requirements at all qualifying facilities Assess each site for opportunities to implement alternative practices or BMPs to reduce pollutants due to District activities Maintain a list of sites where alternative practices or BMPs could reduce pollutants Implement a program to reduce pollutant discharge from District activities on District property Maintain records of the number of District-owned facilities that require a State or Federal permit (environmental) and the current Permit compliance status Annually report on the number of District-owned facilities that require any type of environmentally related Permit and the current Permit compliance status	Annually
District Employee Education	Develop a list of topics for inclusion and discussion in the District Employee Education Program Develop or acquire available material from EPA, State or other agencies or organizations, or utilize educational events offered by these entities Schedule training opportunities for employees that will benefit most from each subject matter	Annually

Spill Prevention Plans	Inventory of District owned facilities that may required to have Spill Prevention Control and Countermeasures Plans(SPCC) is maintained and updated Evaluate identified facilities and determine if SPCC Plans are required Develop and/or maintain SPCC Plans for District owned facilities that require plans Comply with SPCC Plan requirements at qualifying District owned facilities	Annually
Contractor Requirements And Oversight	Upon expiration of existing contracts that relate to District owned properties and have the potential of impacting stormwater quality, Brushy Creek will evaluate and revise contracts to adopt the District's stormwater quality BMPs. Implement revised contracts	Weekly
Pet Waste Management	Provide and maintain pet waste stations at designated areas Identify new locations at which stations can be added Develop a prioritized list of District owned facilities where Pet waste Stations can be added Implement a program to add Pet Waste Stations at additional	Weekly

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CONTROL MEASURE NUMBER SIX

6.0 Industrial Stormwater Sources

This control measure is not applicable to the District. The District is currently a level 2 small MS4.

RECORDKEEPING AND REPORTING

Records shall be kept in accordance with the Permit in order to document successful implementation of the SWMP. Annual reports shall be submitted to the TCEQ within 90 days of the end of each Permit year.

Recordkeeping:

1. The District shall retain all records, a copy of the Permit, a copy of each annual report, and records of all data used to complete the application (NOI) for the Permit for a period of at least three years, or for the remainder of the term of the Permit, whichever is longer. This period may be extended by request of the executive director at any time.
2. The District shall submit the records to the executive director if specifically asked to do so. The SWMP required by the Permit (including a copy of the General Permit) will be retained at the District's office at 16318 Great Oaks Drive, Round Rock, TX 789681.
3. The District will make the NOI and the SWMP available to the public if requested to do so in writing. Copies of the SWMP shall be made available within 10 working days of receipt of a written request. Other records will be provided in accordance with the Texas Public Information Act.

Reporting:

1. General Reporting Requirements
 - a. Noncompliance Notification According to 30 TAC, 305.125(9), any noncompliance which may endanger human health or safety, or the environment, will be reported by the District to the TCEQ regional office within 24 hours of becoming aware of the noncompliance. A written report must be provided by the District to the TCEQ regional office and to the TCEQ Enforcement Division (MC-224) within five working days of becoming aware of the noncompliance.
 - b. The written report must contain:
 - A description of the noncompliance and its cause;
 - The potential danger to human health or safety, or the environment;
 - The period of noncompliance, including exact dates and times;
 - If the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance, and to mitigate its adverse effects; and
 - Other Information: If the District becomes aware that it either submitted incorrect information or failed to submit complete and accurate information requested in an NOI, NOT, or NOC, or any other report, it must promptly submit the facts or information to the TCEQ.

2. Annual Report

- a. The District will submit a concise annual report to the executive director of the TCEQ within 90 days of the end of each Permit year. The annual report must address the previous Permit year. The first Permit year for annual reporting purposes shall begin on the permit effective date and shall last for a period of one(1) year (the end of the permit year). Subsequent calendar years will begin on the anniversary date of Permit issuance and last for one year. The District will also make a copy of the annual report readily available for review by TCEQ personnel upon request. The report shall include:
- The status of the compliance with Permit conditions, an assessment of the appropriateness of the identified BMPs, progress towards achieving the statutory goal of reducing the discharge of pollutants to the MEP, the measurable goals for each of the MCMs, and an evaluation of the success of the implementation of the measurable goals;
 - Status of any additional control measures implemented by the District (if applicable);
 - Any activities initiated before Permit issuance will be submitted as part of the first year's annual report;
 - A summary of the results of information collected and analyzed, if any, during the reporting period used to assess the success of the program at reducing the discharge of pollutants to the MEP;
 - A summary of the stormwater activities the District plans to undertake during the next reporting cycle;
 - Proposed changes to the SWMP, including changes to any BMPs or any identified measurable goals that apply to the program elements;
 - The number of municipal construction activities authorized under the Permit and the total number of acres disturbed;
 - The number of non-municipal construction activities that occurred within the jurisdiction of the District (as noticed to the District by the construction operator); and
 - Notice that the MS4 operator is relying on another government entity to satisfy some of its Permit obligations (not currently applicable).

The annual report shall be submitted to the following address:

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

A copy of the annual report must also be submitted to the TCEQ Regional Office that serves the area of the regulated small MS₄, except if the report is submitted electronically.