

**Municipal Separate Storm Sewer System**  
**Stormwater Management Program**

TPDES No. TXR040499

April 26, 2022



The City of Mont Belvieu  
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## 1 Background

Through the requirements of Public Law 92-500, the Clean Water Act, the U.S. Environmental Protection Agency (EPA) is required to protect the water quality for natural waters throughout the country. Working to reduce or eliminate the pollutants from the waters of the U.S., the EPA established the program known as the National Pollutant Discharge Elimination System (NPDES) to identify water pollution sources.

The EPA has delegated responsibility for the NPDES program in Texas to the Texas Commission on Environmental Quality (TCEQ). In addition to issuing discharge permits to traditional point sources, such as wastewater treatment plants, TCEQ is also responsible for minimizing pollution from non-point sources, such as stormwater runoff from construction sites, industrial facilities and municipal separate stormsewer systems (MS4s).

The TCEQ has issued requirements for minimizing stormwater pollution from construction sites and industrial facilities through the issuance of general permits. Sites and facilities comply with these requirements by developing and implementing site-specific stormwater pollution prevention plans. To protect storm water quality from pollution entering MS4s in highly populated areas, the TCEQ has developed a general permit with specific conditions that apply to MS4s.

### 1.1 Purpose and Scope

The City of Mont Belvieu is required under the Texas Pollutant Discharge Elimination System (TPDES) General Permit TXR040000 to develop and implement a Stormwater Management Program (SWMP). The SWMP includes an overview of the ordinances and other regulatory mechanisms that provide legal authority to implement and enforce the requirements of the permit and outlines the minimum control measures (MCMs) used to meet the requirements of TPDES General Permit TXR040000. The SWMP provides the City with a comprehensive plan that will serve as a guide for management of the city's stormsewer system and is intended to comply with TPDES General Permit TXR040000 requirements.

This SWMP replaces and supersedes the previous SWMP developed for the city. The SWMP is composed of the following sections:

Section 1: Background: Provides the purpose and scope of the SWMP.

Section 2: SWMP Review: Provides a summary of the review and proposed revisions to the existing SWMP to be considered for the new SWMP and permit term beginning January 1, 2019.

Section 3: Impaired Water Bodies: Provides a description of receiving water bodies with an existing Total Maximum Daily Load (TMDL). This section also provides information on TMDLs that are currently in the process of being developed.

Section 4: Minimum Control Measures: Provides a summary of the BMPs intended to support each MCM, related SWMP implementation activities, schedule for implementation of the BMPs, and measurable goals.

Appendices: Appendices include details of the SWMP, including a table summary of the BMPs for each MCM, the general permit and Notice of Intent (NOI), and the Illicit Discharge Detection and Elimination (IDDE) plan. Appendices are also provided for the proposed inventory of municipal facilities and each annual report during the term of the permit.

## 1.2 Stormwater Management Program Requirements

The city is required to develop and submit to TCEQ a NOI for eligible discharges that will reach waters of the U.S. with a SWMP that includes a schedule for implementation for undertaking the required actions, including interim milestones and the frequency of the action throughout the permit term. New elements in the SWMP must be completely implemented within five years of the effective date of this general permit. The city must assess existing program elements set forth in the previous permit, modify as necessary, and develop and implement new elements, as necessary, to continue reducing the discharge of pollutants from the MS4 to the maximum extent practicable (MEP).

TPDES General Permit TXR040000 categorizes MS4s by population:

- Level 1: Small MS4 operators that serve a population of less than 10,000 within an Urbanized Area (UA);
- Level 2: Small MS4 operators that serve a population of at least 10,000 but less than 40,000 within a UA;
- Level 3: Small MS4 operators that serve a population of at least 40,000 but less than 100,000 within a UA; and
- Level 4: Small MS4 operators that serve a population of 100,000 or more within a UA.

According to the results of the 2010 Census, Mont Belvieu is within the category of Level 1 with a population of 5,584. Implementation of the MEP standard requires the development and implementation of BMPs and the achievement of measurable goals to satisfy five MCMs. It is expected that when these MCMs are addressed in concert, it will result in significant reductions of pollutants being discharged into receiving water bodies.

The five MS4 program MCMs are:

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

A sixth MCM (Industrial Stormwater Sources) is prescribed for only Level 4 MS4s and an optional seventh MCM, to address municipal construction activities through their SWMP, was not selected for inclusion in this SWMP.

### **1.2.1 Legal Authority**

The City of Mont Belvieu is a chartered home-rule municipality, operated by a council - manager form of government. The city regulates activities within its corporate limits through ordinances designed to protect the health, safety, and welfare of its citizens. As an incorporated municipality, the city has the statutory authority to enact ordinances which provide the legal authority to carry out all aspects of the SWMP. Ordinances that provide the legal authority to implement and enforce the requirements of the SWMP are found within Chapter 40 Utilities.

#### **1.2.1.1 Legal Authority Required Under the General Permit**

Under the terms of the general permit, the city must review existing ordinances and consider additional ordinances as described in the SWMP to verify legal authority for specific control measures described in the TPDES General Permit. The city's legal authority must include:

- a. Authority to prohibit illicit discharges and illicit connections.
- b. Authority to respond to and contain other releases - control the discharge of spills and prohibit dumping or disposal of materials other than stormwater in the MS4.
- c. Authority to require compliance with conditions in the city's ordinances, permits, contracts, or directives.
- d. Authority to require installation, implementation, and maintenance of control measures.
- e. Authority to receive and collect information [from construction site operator, land developments, and industrial and commercial facilities], such as stormwater

- plans and inspection reports, necessary to assess compliance with the general permit.
- f. Authority to enter and inspect private property including facilities, equipment, practices, or operations related to stormwater discharges to the MS4.
  - g. Authority to respond to non-compliance with BMPs required by the city.
  - h. Authority to assess penalties, including monetary, civil, or criminal penalties.
  - i. Ability to enter into interagency or interlocal agreements or other maintenance agreements, as necessary.

The city will undertake a process to review and revise (if necessary) relevant ordinances that provide legal authority to control pollutant discharges into the MS4 in order to meet the requirements of the general permit or develop such ordinances that establish the city's legal authority. Progress in the review of existing ordinances will be reported in the Annual Reports and will be an ongoing action taken by the city for the years to come.

### 1.3 Recordkeeping and Reporting Requirements

A primary component of the MS4 general permit is recordkeeping that allows for periodic evaluation of the management plan and for annual reporting to the TCEQ on the status of the plan. Specifically, Phase II MS4s are required to:

- Retain all records, a copy of the TCEQ general permit, and records of all data used to complete the NOI for a period of three years or for the term of the TCEQ permit, whichever is longer.
- Retain a copy of the SWMP at a location accessible to the TCEQ.
- Make the records, including the Notice of Intent (NOI) and SWMP, available to the public if requested to do so in writing. The SWMP must be made available within ten (10) working days following a written request. Other records must be provided in accordance with the Texas Public Information Act.
- The period during which records are required to be kept shall be automatically extended to the date of the final disposition of any administrative or judicial enforcement action that may be instituted against the permittee.

The following subsections summarize the general reporting requirements for MS4s

#### 1.3.1 Noncompliance Notification

Under the terms of the general permit, the city must develop a standard operating procedure (SOP) to respond to violations to the extent allowable under state and local law. Any noncompliance which may endanger human health or safety, or the environment, in

accordance with 30 TAC Chapter 305.125(9), must be reported by the MS4 to the TCEQ. Oral and/or facsimile notification of the noncompliance must be made within 24 hours of becoming aware of the issue. A written report must be provided to the TCEQ within five working days. Additionally, the MS4 must promptly submit to TCEQ any facts or information relevant to an NOI, Notice of Termination, Notice of Change, or any other report.

### **1.3.2 Annual Report**

The city will submit a concise annual report to the executive director within 90 days of the end of each reporting year. The annual report must address the previous reporting year. The general permit provides three options for MS4 operators to designate as the reporting year: the permit year, the city's fiscal year, or the calendar year. The City of Mont Belvieu has elected to use calendar year as the reporting year, making annual reports to TCEQ due by December 31 of each year, beginning December 31, 2019.

The annual report will include:

1. 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;
2. A summary of the results of information collected and analyzed, during the reporting period, including monitoring data used to assess the success of the program at reducing the discharge of pollutants to the MEP;
3. A summary of the stormwater activities the MS4 operator plans to undertake during the next reporting year;
4. Proposed changes to the SWMP, including changes to any BMPs or any identified measurable goals that apply to the program elements; and
5. Notice that the MS4 operator is relying on another government entity to satisfy some of its permit obligations (if applicable);

The annual report will also include a summary of any proposed changes to the SWMP planned for the next reporting cycle.

## **1.4 Definitions**

The definitions of terms within this SWMP are those within TPDES General Permit TXR040000, Part I - Definitions (See Appendix C).



## 2 SWMP Review

The existing SWMP was reviewed for conformance with the terms of the new general permit, experience in administering the program, and for clarity in communicating the objectives of each BMP. This SWMP proposes revisions to the city's existing SWMP to streamline administration of the program and to strengthen the effectiveness of the control measures used in the program.

Revisions to the SWMP are summarized in the following paragraphs.

1. **BMP Structure:** The MCMs have been restructured to reflect the combination of Public Education with Public Involvement under MCM No. 1: Public Education, Outreach, and Involvement as defined in the new general permit. BMPs have also been assigned a number within each MCM.
2. **Implementation Schedule:** The implementation schedule is based on the calendar year (ending December 31). BMP implementation is scheduled for the month of January 1st each year.
3. **Program Flexibility:** BMPs have been revised or amended to improve flexibility and program performance.
4. **SWMP Efficiency:** Certain BMPs are proposed to be replaced with control measures that are expected to afford better results in managing stormwater quality.

## 3 Impaired Water Bodies

The TCEQ Surface Water Quality Viewer identifies three stream segments that surround the City of Mont Belvieu. Those stream segments are Segment 0801B (Old River), Segment 0901 (Cedar Bayou), and Segment 0801C (Cotton Bayou). Stream Segment 0901 (Cedar Bayou) and Segment 0801C (Cotton Bayou) are recognized as Impaired according to the most updated Texas Integrated Report Index of Water Quality Impairments List and TMDL 303d List.

Impaired stream Segment 0901 (Cedar Bayou) has three parameters undergoing additional data or information to develop proper TMDL's. Those parameters are Bacteria, Dioxin in Edible Tissue, and PCBs in Edible Tissue. The City of Mont Belvieu does have stormwater outfalls that discharge directly into this stream. The City of Mont Belvieu does not have any wastewater plants that discharge into this stream. Segment 0901 indirectly discharges into impaired segment 2421OW (Upper Galveston Bay Oyster Waters). According to the Implementation Plan for Eleven Total Maximum Daily Loads for Bacteria in Waters of the Upper Gulf Coast, "Flows in the Galveston Bay watershed are highly variable and difficult to measure; consequently, a load-based analysis would add to uncertainty in the load

allocations. Therefore, the TMDL plan established concentration-based TMDLs and pollutant load allocations, expressed in terms of fecal coliform concentrations. Using a concentration-based method, the TMDL becomes the target water-quality concentration and the WLA and LA terms are the concentration limits placed on the sources belonging to each type of source.” Also, according to the Implementation Plan for Eleven Total Maximum Daily Loads for Bacteria in Waters of the Upper Gulf Coast, “Numerical concentrations requirements are unreasonable for storm water runoff. This TMDL will require MS4s to follow implementation of bacteria reduction efforts and best management practices.” The City will evaluate the control measures for bacteria resulting from these efforts and the indicators of control measure success for incorporation into the City's SWMP.

Impaired stream Segment 0801C (Cotton Bayou) has two parameters undergoing additional data or information to develop proper TMDL's. Those parameters are Bacteria and Depressed Dissolved Oxygen. The City of Mont Belvieu does have stormwater outfalls that discharge directly into this stream. The City of Mont Belvieu does have wastewater plants that discharge into this stream. The 2019 Wastewater Plant Permit WQ001480700 has been accepted by TCEQ. The City of Mont Belvieu follows the accepted standards. The City takes daily samples of the wastewater plant's effluent. From past reports, the parameters such as Bacteria and Depressed Dissolved Oxygen levels are accepted according to the permit standards. The City will evaluate the control measures for bacteria resulting from these efforts and the indicators of control measure success for incorporation into the City's SWMP.

Potential significant sources of bacteria could be from the stormwater outfalls that drain areas such as parks and farmland where fecal matter exist. Infiltration and inflow of the existing sanitary sewer infrastructure could be a potential source of bacteria. The City of Mont Belvieu will specifically address the impairment of bacteria to both its citizens and employees through various public outreach programs listed in the following section. This will be achieved through employee training, brochures distributed to citizens and businesses, and various links found on the City of Mont Belvieu Storm Water Management website. The City of Mont Belvieu also implements employee trainings to make employees aware of the impairments and how to properly execute tasks while limiting and eliminating potential incidents that would add to the impairments. Additional BMP's will be continued and created to address the impairment of bacteria in the nearby streams.

Impaired Water Bodies Table			
Segment IDs	Impairment	TCEQ Update	City's Plan of Action
Segment 0901 (Cedar Bayou)	*Bacteria	Additional data or information will be collected and/or evaluated for one or more parameters before a management strategy is selected.	Implement public awareness and education of the impairment and water body
	*Dioxin in Edible Tissue	TMDLs are underway, scheduled, or will be scheduled for one or more parameters.	Implement public awareness and education of the impairment and water body
	*PCBs in Edible Tissue	TMDLs are underway, scheduled, or will be scheduled for one or more parameters.	Implement public awareness and education of the impairment and water body
Segment 0801C (Cotton Bayou)	*Bacteria	Additional data or information will be collected and/or evaluated for one or more parameters before a management strategy is selected.	Implement public awareness and education of the impairment and water body
	*Depressed Dissolved Oxygen	Additional data or information will be collected and/or evaluated for one or more parameters before a management strategy is selected.	Implement public awareness and education of the impairment and water body
Segment 2421OW (Upper Galveston Bay Oyster Waters)	*Bacteria in Oyster Waters	All TMDLs have been completed and approved by the EPA.	Implement public awareness and education of the impairment and water body

## 4 Minimum Control Measures

PLEASE SEE [APPENDIX A](#) FOR TABLE-FORMAT OF BMPS WITH TIME FRAMES AND MEASURABLE GOALS.

### 4.1 MCM 1: Public Education, Outreach, and Involvement

*General Permit Requirement: **Part III.B.1***

*All permittees shall develop, implement, and maintain a comprehensive stormwater education and outreach program to educate public employees, businesses, and the general public of hazards associated with the illegal discharges and improper disposal of waste and about the impact that stormwater discharges can have on local waterways, as well as the steps that the public can take to reduce pollutants in stormwater.*

### **4.1.1 Best Management Practices**

The BMPs for this MCM were selected to focus on: 1) providing information to the community on actions that can adversely affect stormwater quality; 2) providing technical training to city staff and construction contractors on specific elements of the permit; and 3) opportunities for the public to be involved in the management of stormwater quality and to participate in evaluating the various control measures. Permit elements of the previous permit that appeared to be effective in informing the local community about how residents and businesses can affect stormwater quality.

#### **Target Audiences**

Best management practices for public education are focused on residents, businesses, contractors, city staff, and commercial businesses. Public involvement efforts are designed to engage residents and businesses in ongoing stormwater programs supported by the city.

#### **BMP 1.1 Educational Brochures**

The City of Mont Belvieu will develop a variety of educational brochures that are designed to inform residents and businesses of the effects of polluted stormwater runoff and how individuals can minimize impacts. The SWMP and annual reports will be available for public review and comment at the Mont Belvieu City Hall.

#### **Measurable Goals:**

- The City will produce 100 educational brochures about storm water pollution prevention runoff by December 31, 2021. The brochures will be displayed at the front desk of Mont Belvieu's City Hall. Re-stock the brochures as needed annually and record the re-printed brochures.

#### **BMP 1.2 Educational Bill Inserts**

The City of Mont Belvieu will develop a variety of educational bill inserts that are designed to inform residents and businesses of the effects of polluted stormwater runoff and how individuals can minimize impacts. The SWMP and annual reports will be available for public review and comment at the Mont Belvieu's City Hall.

#### **Measurable Goals:**

- The City will create and send out educational utility bill inserts every six months starting December 31, 2021.

### **BMP 1.3 Public Service Announcements**

The City will utilize public service announcements (PSAs). In the past, this has been a successful outreach approach by connecting with audiences through radio, webpage information ( <http://www.montbelvieu.net/> ), and television outlets. Audiences can respond to questionnaires about the most pertinent stormwater pollution related issues via City staff email contacts.

#### **Measurable Goals:**

- The city will produce and at least one public service announcement (PSA) by December 31, 2021 and continue annually through radio or television outlets.

### **BMP 1.4 Public Involvement Events**

The City of Mont Belvieu will promote public involvement events that supports storm water pollution prevention education. Events such as hazardous waste recycling and stream clean-up events. The City will host such events and the public can dispose of their hazardous waste material properly or clean-up the environment.

#### **Measurable Goals:**

- The City will create one public involvement event each year beginning January 1, 2022.

### **BMP 1.5 List Server**

A list server will help the City communicate more effectively with the residents about storm water related events, concerns, and repairs throughout the MS4.

#### **Measurable Goals:**

- Create a list server of 100% of the residents by December 31, 2023.

## **4.2 MCM 2: Illicit Discharge Detection and Elimination**

*General Permit Requirement: **Part III.B.2***

*All permittees shall develop, implement and enforce a program to detect, investigate, and eliminate illicit discharges into the small MS4. The program must include a plan to detect and address non-stormwater discharges, including illegal dumping to the MS4 system.*

## 4.2.1 Best Management Practices

### **BMP 2.1 Illicit Discharge Detection and Elimination Legal Authority**

City staff will conduct a review of existing legal authority and submit proposals to the city council for ensuring the legal authority exists to effectively prohibit non-storm water discharges into the city's storm sewer system. The city will set minimum investigation requirements for illicit discharges.

#### **Measurable Goals:**

- Verify that existing ordinance provides legal authority for the controls identified in the general permit by December 31, 2021.
- Create/adopt minimum guidelines for illicit discharge elimination from year 4 to 5 of the new SWMP.

### **BMP 2.2 Stormwater System Verification and Update**

The map of the city's storm sewer system will be updated as needed to reflect additions or changes to the location of all outfalls, extensions, or replacements of storm sewers.

#### **Measurable Goals:**

- Update 100% of the City's GIS storm sewer system by December 31, 2023. The City will keep its GIS system updated annually following this BMP deadline.

### **BMP 2.3 Employee Illicit Discharge Training**

In addition to city staff training on the SWMP, the city will develop a training program for field employees in recognizing and reporting illicit discharges and connections to the MS4.

#### **Measurable Goals:**

- Develop or update the current storm pollution runoff and illicit discharge clean-up training program by December 31, 2021. Host at least one employee training event each year for the remaining duration of the new 2019 SWMP.

## **BMP 2.4 Removal of Fats, Oils, and Grease from the Wastewater Collection System**

Inform residents and food service businesses of the need to avoid discharging fats, oil, and grease (FOG) to the wastewater collection system.

### **Measurable Goals:**

- Post FOG information and facts on the City webpage by December 31, 2021.
- Send educational FOG pamphlets to residents or produce an informative newspaper message covering FOG facts annually starting 2022.

## **BMP 2.5 Waste Oil Recycling**

The City of Mont Belvieu collects waste oil during weekly curbside solid waste collection.

### **Measurable Goals:**

- Publish at least one announcement about waste oil recycling facts and annually on the City's webpage.
- Add oil collection informative on the webpage by the December 31, 2022.

## **BMP 2.6 Illicit Discharge Inspection**

The City of Mont Belvieu will document the exact work process from the receipt of information from the public or discovery of an illicit discharge through investigation and the removal of the source.

### **Measurable Goals:**

- Report and record all illicit discharges within the MS4 annually on the city's webpage starting December 31, 2022.

## **4.3 MCM 3: Construction Site Stormwater Runoff Control**

*General Permit Requirement: **Part III.B.3***

*All permittees shall develop, implement and enforce a program requiring operators of small and large construction activities, as defined in Part I of the general permit, 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 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.*

### **4.3.1 Best Management Practices**

#### **BMP 3.1 Construction Site Stormwater Runoff Control Legal Authority**

The City will review and update existing ordinances requiring erosion, sediment, and on-site waste controls to ensure compliance with TPDEX TXR040000. The regulations include enforcement procedures and actions for failing to comply.

##### **Measurable Goals:**

- Verify that existing ordinance provides legal authority for the controls identified in the general permit by December 31, 2020. Continue to enforce this ordinance's regulations for erosion and sediment control for years 3-5.

#### **BMP 3.2 Construction Plan Review**

The city will review plans for construction to verify temporary erosion and sediment controls are provided in accordance with the city ordinance.

##### **Measurable Goals:**

- Report and record 100% of the total construction plans reviewed annually beginning January 1, 2019.

#### **BMP 3.3 Construction Site Inspection**

The city will inspect construction sites to verify that temporary erosion control BMPs are in place.

##### **Measurable Goals:**

- Inspect all construction sites within the MS4 annually starting January 1, 2019.

#### **BMP 3.4 Receive Public Input on Construction Projects**

The city has selected receiving public input for implementation as part of this SWMP. This BMP coordinates with MCM #1 and can be integrated into existing activities through receipt of information from the public at the existing Planning and Zoning hearings and City Council



meetings. Additional inputs can be received less formally through the City website and at the designated phone number and mailing address.

**Measurable Goals:**

- Record 100% of the public's input about construction projects within the MS4 annually beginning January 1, 2022.

**BMP 3.5 Construction Site Operation Education**

The City will develop an educational construction site operation pamphlet. The pamphlets will educate Contractors about working within the MS4 like City ordinances, guidelines, emergency contact numbers.

**Measurable Goals:**

- Produce educational construction site operation pamphlets within the first 3 years of the new 2019 SWMP. Provide the pamphlets to 100% of the contractors that work within the MS4 every year starting December 31, 2021.

## 4.4 MCM 4: Post-Construction Stormwater Management in New Development and Redevelopment

*General Permit Requirement: **Part III.B.4***

*All permittees shall develop, implement and enforce a program, to the extent allowable under state, federal, and local law, to control stormwater discharges from new development and redeveloped sites that discharge into the small MS4 that disturb one acre or more, including projects that disturb less than one acre that are part of a larger common plan of development or sale. The program must be established for private and public development sites. The program may utilize an offsite mitigation and payment in lieu of components to address this requirement.*

### 4.4.1 Best Management Practices

**BMP 4.1 Post-Construction Stormwater Management Legal Authority**

The City will review and update existing ordinances requiring erosion, sediment, and on-site waste controls to ensure compliance with TPDEX TXR040000. The regulations include enforcement procedures and actions for failing to comply.

**Measurable Goals:**

- Review and update the city's current development code for requirements for post-construction maintenance of BMPs for new development and redevelopment construction sites of 1 acre or more, and in projects of less than 1 acre that are part of a larger common plan of development, redevelopment, or sale by December 31, 2020.

#### **BMP 4.2 Site Plan Review and Approval Process**

By ordinance, the city requires a final inspection of landscaping and stabilization of disturbed soils after construction. The city will continue to require a plan for site stabilization after construction is complete as well as designation of the parties responsible for maintenance of vegetation at the site and what practices will be employed to ensure that adequate vegetative cover is preserved.

##### **Measurable Goals:**

- Record 100% of the final inspections of construction projects within the MS4 each year starting December 31, 2021.

#### **BMP 4.3 Maintenance of Structural Controls within the MS4**

The city will inventory city-owned and operated facilities and stormwater controls listed in Part III.B.5.(b)(1) of the general permit. The pollutant discharge potential of each facility will be assessed as a part of this inventory. Standard operating procedures (SOPs) for good housekeeping, equipment washing and fueling operations, vehicle maintenance, and chemical and fertilizer application will be drafted and used to establish guidelines and standards for municipal facilities and operations.

##### **Measurable Goal:**

- Inventory/record 100% of municipal facilities and storm water controls by December 31, 2021, through visual and operational inspection.
- Assess and record the pollutant discharge potential of all municipal facilities by December 31, 2022.
- Develop/Review 100% of the maintenance procedures for the City's structural facilities by December 31, 2022.

## **4.5 MCM 5: Pollution Prevention and Good Housekeeping for Municipal Operations**

*General Permit Requirement: **Part III.B.5***

*All permittees shall develop and implement an operation and maintenance program, including an employee training component that has the ultimate goal of preventing or reducing pollutant runoff from municipal activities and municipally owned areas including but not limited to park and open space maintenance; street, road, or highway maintenance; fleet and building maintenance; stormwater system maintenance; new construction and land disturbances; municipal parking lots; vehicle and equipment maintenance and storage yards; waste transfer stations; and salt/sand storage locations .*

#### **4.5.1 Best Management Practices**

##### **BMP 5.1 Pollution Prevention and Spill Response Training**

Information on preventing and reducing stormwater pollution from all municipal operations will be provided to city employees. Training will address topics such as the proper procedures for reporting, containing spills and preventing pollutants from entering the stormwater system. Safety meetings and area-specific meetings will be held.

###### **Measurable Goals:**

- Develop a pollution prevention workshop by December 31, 2021.
- Hold a pollution prevention training workshop for municipal and landscaping employees annually for years 4-5.

##### **BMP 5.2 Municipal Contractor Oversight**

City contract documents will be revised to require contractors hired to provide maintenance of city-owned facilities to comply with good housekeeping practices, best management practices, and facility-specific pollution prevention procedures.

###### **Measurable Goals:**

- Revise city contracts for facility maintenance to require contractor compliance with stormwater pollution prevention and good housekeeping practices by December 31, 2020.

##### **BMP 5.3 Municipal Operation and Maintenance Activity Assessment**

The city will evaluate the operations and maintenance (O&M) activities in street and parking lot maintenance, bridge maintenance, and rights-of-way maintenance for potential discharge of pollutants to stormwater.

###### **Measurable Goals:**

- Evaluate O&M activities for potential stormwater pollutant discharge within year 2 of the new 2019 SWMP.
- Identify pollutants of concern that could be released from O&M activities by year 3 of the 2019 SWMP. Implement pollution prevention measures as necessary.
- City will place spill kits at 100% of all municipal facilities with a high risk of spills and leaks within the MS4 by December 31, 2023.

#### **BMP 5.4 Pet Waste Management in City Parks**

The city will maintain existing pet waste receptacles in city parks.

##### **Measurable Goals:**

- Record and maintain 100% of pet waste baskets at all public parks within the MS4 annually for years 1-5. Report the number of pet waste bags purchased and used.

#### **BMP 5.5 Maintenance of Roadways**

The city presently operates a program of street sweeping for city streets. The city will continue the street sweeping program to reduce accumulations of sediment and litter on city streets.

##### **Measurable Goals:**

- Sweep at least one mile of roadway annually for years 1-5. Replace/rehab roadway as necessary.

#### **BMP 5.6 Sanitary Sewer Rehabilitation**

Sewer main replacement projects designed to improve collection system capacity, prevent infiltration, and prevent sanitary sewer overflows has been made part of the City's 10-Year Capital Improvement Program. These projects are programmed for funding and construction through 2025.

##### **Measurable Goals:**

- Investigate and/or replace at least 1000 LF of sanitary sewer pipe annually starting January 1, 2020.