

City of Schertz, Texas

Storm Water Management Plan

MS4 Permit Renewal



February 2025 Update

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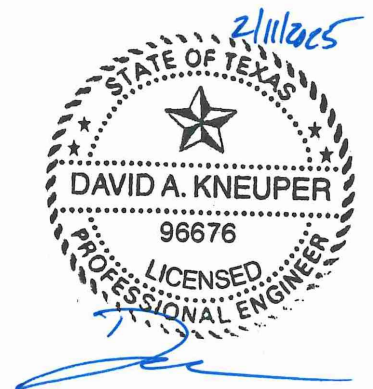


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1. DEFINITIONS AND ACRONYMS

1.1 DEFINITIONS

The following definitions of common storm water quality and management terminology have been copied for ease of reference from the TCEQ TPDES General Permit No. TXR040000.

Arid Areas – Areas with an average annual rainfall of less than ten inches.

Benchmarks – A benchmark pollutant value is a guidance level indicator that helps determine the effectiveness of chosen best management practices (BMPs). This type of monitoring differs from “compliance monitoring” in that exceedances of the indicator or benchmark level are not permit violations, but rather indicators that can help identify problems at the Municipal Separate Storm Sewer System (MS4) with exposed or unidentified pollutant sources; or control measures that are either not working correctly, whose effectiveness need to be re-considered, or that need to be supplemented with additional BMP(s).

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

Catch Basins – Storm drain inlets and curb inlets to the storm drain system. Catch basins typically include a grate or curb inlet that may accumulate sediment, debris, and other pollutants.

Classified Segment – A water body that is listed and described in Appendix A or Appendix C of the Texas Surface Water Quality Standards, at 30 Texas Administrative Code (TAC) § 307.10.

Clean Water Act (CWA) – The Federal Water Pollution Control Act or Federal Water Pollution Control Act Amendments of 1972, Pub. L. 92-500, as amended Pub. L. 95-217, Pub. L. 95-576, Pub. L. 96-483, and Pub. L. 97-117, 33 U.S.C. 1251 et. seq.

Common Plan of Development or Sale – A construction activity that is completed in separate stages, separate phases, or in combination with other construction activities. A common plan of development or sale is identified by the documentation for the construction project that identifies the scope of the project, and may include plats, blueprints, marketing plans, contracts, building permits, a public notice or hearing, zoning requests, or other similar

documentation and activities.

Construction Activity – Soil disturbance, including clearing, grading, excavating, and other construction related activities (e.g., stockpiling of fill material and demolition); and not including routine maintenance that is performed to maintain the original line and grade, hydraulic capacity, or original purpose of the site (e.g., the routine grading of existing dirt roads, asphalt overlays of existing roads, the routine clearing of existing right-of-ways, and similar maintenance activities). Regulated construction activity is defined in terms of small and large construction activity.

Small Construction Activity is construction activity that results in land disturbance of equal to or greater than one acre and less than five acres of land. Small construction activity also includes the disturbance of less than one acre of total land area that is part of a larger common plan of development or sale if the larger common plan will ultimately disturb equal to or greater than one and less than five acres of land.

Large Construction Activity is construction activity that results in land disturbance of equal to or greater than five acres of land. Large construction activity also includes the disturbance of less than five acres of total land area that is part of a larger common plan of development or sale if the larger common plan will ultimately disturb equal to or greater than five acres of land.

Construction Site Operator – The entity or entities associated with a small or large construction project that meet(s) either of the following two criteria:

- (a) The entity or entities that have operational control over construction plans and specifications (including approval of revisions) to the extent necessary to meet the requirements and conditions of this general permit; or
- (b) The entity or entities that have day-to-day operational control of those activities at a construction site that are necessary to ensure compliance with a stormwater pollution prevention plan (SWP3) for the site or other permit conditions (for example they are authorized to direct workers at a site to carry out activities required by the SWP3 or comply with other permit conditions).

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

Conveyance – Curbs, gutters, man-made channels and ditches, drains, pipes, and other constructed features designed or used for flood control or to otherwise transport stormwater runoff.

Discharge – When used without a qualifier, refers to the discharge of stormwater runoff or

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certain non-stormwater discharges as allowed under the authorization of this general permit.

Edwards Aquifer – As defined in 30 TAC § 213.3 (relating to the Edwards Aquifer), that portion of an arcuate belt of porous, water-bearing, predominantly carbonate rocks known as the Edwards and Associated Limestones in the Balcones Fault Zone trending from west to east to northeast in Kinney, Uvalde, Medina, Bexar, Comal, Hays, Travis, and Williamson Counties; and composed of the Salmon Peak Limestone, McKnight Formation, West Nueces Formation, Devil's River Limestone, Person Formation, Kainer Formation, Edwards Formation, and Georgetown Formation. The permeable aquifer units generally overlie the less-permeable Glen Rose Formation to the south, overlie the less-permeable Comanche Peak and Walnut Formations north of the Colorado River, and underlie the less-permeable Del Rio Clay regionally.

Edwards Aquifer Recharge Zone – Generally, that area where the stratigraphic units constituting the Edwards Aquifer crop out, including the outcrops of other geologic formations in proximity to the Edwards Aquifer, where caves, sinkholes, faults, fractures, or other permeable features would create a potential for recharge of surface waters into the Edwards Aquifer. The recharge zone is identified as that area designated as such on official maps located on the TCEQ website or in the offices of the TCEQ.

Final Stabilization – A construction site where any of the following conditions are met:

- (a) All soil disturbing activities at the site have been completed and a uniform (for example, evenly distributed, without large bare areas) perennial vegetative cover with a density of 70 percent (%) of the native background vegetative cover for the area has been established on all unpaved areas and areas not covered by permanent structures, or equivalent permanent stabilization measures (such as the use of riprap, gabions, or geotextiles) have been employed.
- (b) For individual lots in a residential construction site by either:
 - (1) The homebuilder completing final stabilization as specified in condition (a) above; or
 - (2) The homebuilder establishing temporary stabilization for an individual lot prior to the time of transfer of the ownership of the home to the buyer and after informing the homeowner of the need for, and benefits of, final stabilization.
- (c) For construction activities on land used for agricultural purposes (for example pipelines across crop or range land), final stabilization may be accomplished by returning the disturbed land to its preconstruction agricultural use. Areas disturbed that were not previously used for agricultural activities, such as buffer strips

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immediately adjacent to a surface water and areas which are not being returned to their preconstruction agricultural use must meet the final stabilization conditions of condition (a) above.

(d) In arid, semi-arid, and drought-stricken areas only, all soil disturbing activities at the site have been completed and both of the following criteria have been met:

- (1) Temporary erosion control measures (e.g., degradable rolled erosion control product) are selected, designed, and installed along with an appropriate seed base to provide erosion control for at least three years without active maintenance by the operator, and
- (2) The temporary erosion control measures are selected, designed, and installed to achieve 70 percent (%) vegetative coverage within three years.

General Permit – A permit issued to authorize the discharge of waste into or adjacent to water in the state for one or more categories of waste discharge within a geographical area of the state or the entire state as provided by Texas Water Code (TWC) § 26.040.

Groundwater Infiltration – For the purposes of this permit, groundwater that enters a municipal separate storm sewer system (including sewer service connections and foundation drains) through such means as defective pipes, pipe joints, connections, or manholes.

High Priority Facilities – High priority facilities are facilities with a high potential to generate stormwater pollutants. These facilities must include, at a minimum, the MS4 operator's maintenance yards, hazardous waste facilities, fuel storage locations, and other facilities where chemicals or other materials have a high potential to be discharged in stormwater. Among the factors that must be considered when giving a facility a high priority ranking are: the amount of urban pollutants stored at the site, the identification of improperly stored materials, activities that must not be performed outside (for example, changing automotive fluids, vehicle washing), proximity to water bodies, proximity to sensitive aquifer recharge features, poor housekeeping practices, and discharge of pollutant(s) of concern to impaired water(s)

Hyperchlorinated Water – Water resulting from hyperchlorination of waterlines or vessels, with a chlorine concentration greater than 10 milligrams per liter (mg/L).

Illicit Connection – Any man-made conveyance connecting an illicit discharge directly to a municipal separate storm sewer.

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

Impaired Water – A surface water body that is identified as impaired on the latest U.S.

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Environmental Protection Agency (EPA) approved Clean Water Act (CWA) § 303(d) List or waters with an EPA approved or established TMDL that are found on the latest EPA approved Texas Integrated Report of Surface Water Quality for CWA Sections 305(b) and 303(d) which lists the category 4 and 5 water bodies.

Implementation Plan (I-Plan) – A detailed plan of action that describes the measures or activities necessary to achieve the pollutant reductions identified in the total maximum daily load (TMDL).

Indian Country – Defined in 18 U.S.C. § 1151 as:

- (a) All land within the limits of any Indian reservation under the jurisdiction of the United States (U.S.) Government, notwithstanding the issuance of any patent, and including rights-of-way running through the reservation;
- (b) All dependent Indian communities within the borders of the U.S. whether within the original or subsequently acquired territory thereof, and whether within or without the limits of a state; and
- (c) All Indian allotments, the Indian titles to which have not been extinguished, including rights-of-way running through the same. This definition includes all land held in trust for an Indian tribe.

Indicator Pollutant – An easily measured pollutant, that may or may not impact water quality that indicates the presence of other stormwater pollutants.

Industrial Activity – Any of the ten categories of industrial activities included in the definition of “stormwater discharges associated with industrial activity” as defined in 40 Code of Federal Regulations (CFR) § 122.26(b)(14)(i)-(ix) and (xi).

Infeasible – For the purpose of this permit, infeasible means not technologically possible, or not economically practicable and achievable in light of best industry practices. The TCEQ notes that it does not intend for any small MS4 general permit requirement to conflict with state water right laws.

Maximum Extent Practicable (MEP) – The technology-based discharge standard for MS4s to reduce pollutants in stormwater discharges that was established by the CWA § 402(p). A discussion of MEP as it applies to small MS4s is found in 40 CFR § 122.34.

MS4 Operator – For the purpose of this permit, the public entity or the entity contracted by the public entity, responsible for management and operation of the small municipal separate storm sewer system that is subject to the terms of this general permit.

Municipal Separate Storm Sewer System (MS4) – A conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs,

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gutters, ditches, man-made channels, or storm drains):

- (a) Owned or operated by the U.S., a state, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to state law) having jurisdiction over the disposal of sewage, industrial wastes, stormwater, or other wastes, including special districts under state law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under the CWA § 208 that discharges to surface water in the state;
- (b) That is designed or used for collecting or conveying stormwater;
- (c) That is not a combined sewer; and
- (d) That is not part of a publicly owned treatment works (POTW) as defined in 40 CFR § 122.2.

Non-traditional Small MS4 – A small MS4 that often cannot pass ordinances and may not have the enforcement authority like a traditional small MS4 would have to enforce the stormwater management program. Examples of non-traditional small MS4s include counties, transportation authorities (including the Texas Department of Transportation), municipal utility districts, drainage districts, military bases, prisons, and universities.

Notice of Change (NOC) – A written notification from the permittee to the executive director providing changes to information that was previously provided to the agency in a Notice of Intent.

Notice of Intent (NOI) – A written submission to the executive director from an applicant requesting coverage under this general permit.

Notice of Termination (NOT) – A written submission to the executive director from a permittee authorized under a general permit requesting termination of coverage under this general permit.

Outfall – A point source at the point where a small MS4 discharges to Waters of the U.S. and does not include open conveyances connecting two municipal separate storm sewers, or pipes, tunnels, or other conveyances that connect segments of the same stream or other Waters of the U.S. and are used to convey Waters of the U.S. For the purpose of this permit, sheet flow leaving a linear transportation system without channelization is not considered an outfall. Point sources such as curb cuts; traffic or right-of-way barriers with drainage slots that drain into open culverts, open swales, or an adjacent property, or otherwise not actually discharging into Waters of the U.S. are not considered an outfall.

Permittee – The MS4 operator authorized under this general permit.

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Point Source – (from 40 CFR § 122.22) any discernible, confined, and discrete conveyance, including but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, landfill leachate collection system, vessel or other floating craft from which pollutants are or may be discharged. This term does not include return flows from irrigated agriculture or agricultural stormwater runoff.

Pollutant(s) of Concern (POCs) – For the purpose of this permit, includes biochemical oxygen demand (BOD), sediment or a parameter that addresses sediment (such as total suspended solids (TSS), turbidity or siltation), pathogens, oil and grease, and any pollutant that has been identified as a cause of impairment of any water body that will receive a discharge from an MS4. (Definition from 40 CFR § 122.32(e)(3)).

Redevelopment – Alterations of a property that changed the “footprint” of a site or building in such a way that there is a disturbance of equal to or greater than one acre of land. This term does not include such activities as exterior remodeling, routine maintenance activities, and linear utility installation.

Semiarid Areas – Areas with an average annual rainfall of at least ten inches, but less than 20 inches.

Small Municipal Separate Storm Sewer System (MS4) – A conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains):

- (a) Owned or operated by the U.S., a state, city, town, borough, county, district, association, or other public body (created by or pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, stormwater, or other wastes, including special districts under state law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under CWA § 208;
- (b) Designed or used for collecting or conveying stormwater;
- (c) Which is not a combined sewer;
- (d) Which is not part of a POTW as defined in 40 CFR § 122.2; and
- (e) Which was not previously regulated under a National Pollutant Discharge Elimination System (NPDES) or a Texas Pollutant Discharge Elimination System (TPDES) individual permit as a medium or large municipal separate storm sewer system, as defined in 40 CFR §§ 122.26(b)(4) and (b)(7).

This term includes systems similar to separate storm sewer systems at military bases, large

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hospitals or prison complexes, and highways and other thoroughfares. This term does not include separate storm sewers in very discrete areas, such as individual buildings. For the purpose of this permit, a very discrete system also includes storm drains associated with certain municipal offices and education facilities serving a nonresidential population, where those storm drains do not function as a system, and where the buildings are not physically interconnected to a small MS4 that is also operated by that public entity.

Stormwater and Stormwater Runoff – Rainfall runoff, snow melt runoff, and surface runoff and drainage.

Stormwater Associated with Construction Activity – Stormwater runoff from an area where there is either a large construction or a small construction activity.

Stormwater Management Program (SWMP) – A comprehensive program to manage the quality of discharges from the MS4.

Structural Control (or Practice) – A pollution prevention practice that requires the construction of a device, or the use of a device, to capture or prevent pollution in stormwater runoff. Structural controls and practices may include but are not limited to wet ponds, bioretention, infiltration basins, stormwater wetlands, silt fences, earthen dikes, drainage swales, vegetative lined ditches, vegetative filter strips, sediment traps, check dams, subsurface drains, storm drain inlet protection, rock outlet protection, reinforced soil retaining systems, gabions, and temporary or permanent sediment basins.

Surface Water in the State – Lakes, bays, ponds, impounding reservoirs, springs, rivers, streams, creeks, estuaries, wetlands, marshes, inlets, canals, the Gulf of Mexico inside the territorial limits of the state (from the mean high water mark (MHW) out 10.36 miles into the Gulf), and all other bodies of surface water, natural or artificial, inland or coastal, fresh or salt, navigable or nonnavigable, and including the beds and banks of all water courses and bodies of surface water, that are wholly or partially inside or bordering the state or subject to the jurisdiction of the state. Waters in treatment systems which are authorized by state or federal law, regulation, or permit, and which are created for the purpose of waste treatment are not considered to be water in the state.

Total Maximum Daily Load (TMDL) – The total amount of a substance that a water body can assimilate and still meet the Texas Surface Water Quality Standards.

Traditional Small MS4 – A small MS4 that can pass ordinances and have the enforcement authority to enforce the stormwater management program. An example of traditional MS4s includes cities.

Urban Area – A statistical geographic entity consisting of a densely settled core created from

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census blocks and contiguous qualifying territory that together have at least 2,000 housing units or 5,000 persons as defined and used by the U.S. Census Bureau in the 2020 Decennial Census.

Urbanized Area (UA) – A retired statistical geographic entity type consisting of a densely settled core created from census tracts or blocks and adjacent densely settled territory that together have a minimum population of 50,000 people which was used by the U.S. Census Bureau in the 2000 and the 2010 Decennial Census

Waters of the United States – Waters of the United States or Waters of the U.S. means the term as defined in 40 CFR § 122.2.

1.2 COMMONLY USED ACRONYMS

BMP – Best Management Practice
CFR – Code of Federal Regulations
CGP – Construction General Permit
CWS – Clean Water Act
DMR – Discharge Monitoring Report
EPA – Environmental Protection Agency
FR – Federal Register
IP – Implementation Procedures
MCM – Minimum Control Measure
MSGP – Multi-Sector General Permit
MS4 – Municipal Separate Storm Sewer System
NOC – Notice of Change
NOD – Notice of Deficiency
NOI – Notice of Intent
NOT – Notice of Termination
NPDES – National Pollutant Discharge Elimination System
SAWS – San Antonio Water System
SCADA – Supervisory Control and Data Acquisition
SDWA – Safe Drinking Water Act
SSLGC – Schertz – Seguin Local Government Corporation
TCEQ – Texas Commission on Environmental Quality
URI – Utility Resilience Index
VSAT – Vulnerability Self-Assessment Tool
WARN – Water Agency Response Network
WWTP – Wastewater Treatment Plant
WPP – Watershed Protection Plan
SDS – Safety Data Sheet

2. INTRODUCTION

2.1 BACKGROUND

The United States Environmental Protection Agency (EPA) issued regulations in 1999 to protect stormwater quality in small cities and urbanized areas. The EPA established a program known as the National Pollutant Discharge Elimination System (NPDES) to identify water pollution sources and eliminate them. In Texas, the Texas Commission on Environmental Quality (TCEQ) was delegated the responsibility for implementing the regulations through the issuance of a series of General Permits. These general permits authorize the TCEQ to discharge treated and non-treated water sources to Waters of the United States from traditional point sources, such as wastewater treatment plants and industry. TCEQ is also responsible for minimizing pollution from non-point sources, such as stormwater runoff from construction sites and Municipal Storm Sewer Systems (MS4). Regulated MS4s are required to reduce the discharge of pollutants from its MS4 to the Maximum Extent Practicable (MEP), to protect water quality, and to meet the appropriate water quality requirements of the Clean Water Act. The authority to regulate non-point sources of pollution was delegated from TCEQ to operators of storm sewer systems through the general permit TXR040000.

The TCEQ adopted the 2024 TPDES Phase II (Small) Municipal Separate Storm Sewer System General Permit, TXR040000, with an effective date of August 15, 2024. The 2024 general permit is a comprehensive general permit that includes specific best management practices (BMPs) and measurable goals for each minimum control measures (MCM) to specify the “clear, specific, and measurable”: activities, goals, and deadlines that must be implemented by small MS4s in their Stormwater Management Plans (SWMPs) based on their MS4 level. Complete implementation of the SWMP is required within five years from the date of issuance of the 2024 general permit.

2.2 REQUIREMENTS

Existing MS4 permittees have 180 days from the effective date of the 2024 general permit to submit a Notice of Intent (NOI). Applications must be submitted by February 11, 2025. The City of Schertz falls in the Level 3 permit category for the 2024 general permit TX040000 based on a 2020 Decennial Census population of 42,002 residents. For the previous permit period, the city fell in the Level 2 permit category.

The City of Schertz is required to develop an updated SWMP that provides specific actions that will be taken over the upcoming five-year period to reduce pollutant levels and protect the City’s stormwater quality. This SWMP update is also required to provide measurable goals and include a schedule for implementation of the selected BMPs over the SWMP update time. The comprehensive implementation program schedule is included in Appendix A of this update.

The 2024 TPDES Phase II (Small) Municipal Separate Storm Sewer System General Permit, TXR040000, provides six required MCMs, one required for Level 4 MS4s, and one optional MCM. The requirements for each MCM vary based on the permit level of the city. An overview of each listed minimum control measure, as described in the updated general permit, is provided below. The specific requirements for each are provided in Sections 5 through 12.

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1. Public Education and Outreach – The city shall implement a public education and outreach program to distribute educational materials to the community and conduct equivalent outreach about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff.
2. Public Involvement/Participation – The city shall involve the public, and, at minimum, comply with any state and local public notice requirements in the planning and implementation activities related to developing and implementing the SWMP. The city must create opportunities, or support activities that are coordinated by citizen groups, for residents and others to become involved with the SWMP. The activities/BMPs must demonstrate an impact on stormwater runoff by improving water quality.
3. Illicit Discharge Detection and Elimination (IDDE) – The city shall develop, implement, and enforce a program to investigate, detect, and eliminate illicit discharges into the city. The program must include a plan to detect and address non-stormwater discharges, including illegal dumping to the city.
4. Construction Site Stormwater Runoff Control – The city shall develop, implement, and enforce a program requiring operators of small and large construction activities to select, install, implement, and maintain stormwater control measures that prevent illicit discharges to the MEP. The program must include the development and implementation of an ordinance or 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.
5. Post Construction Stormwater Management in New Development and Redevelopment – The city 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.

Additionally, the city shall use, to the extent allowable under state, federal, and local law and local development standards, an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects. The city shall establish, implement, and enforce a requirement that owners or operators of new development and redeveloped sites design, install, implement, and maintain a combination of structural and non-structural BMPs appropriate for the community and that protects water quality. If the construction of permanent structures is not feasible due to space limitations, health and safety concerns, cost effectiveness, or highway construction codes, the permittee may propose an alternative approach to TCEQ.

6. Pollution Prevention and Good Housekeeping for Municipal Operations – The city 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.

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7. Industrial Stormwater Sources – Permittees who operate Level 4 small MS4s shall identify and control pollutants in stormwater discharges to the small MS4 from the permittee's landfills; other treatment, storage, or disposal facilities for municipal waste (for example, transfer stations and incinerators); hazardous waste treatment, storage, disposal and recovery facilities and facilities that are subject to Emergency Planning and Community Right-to-Know Act (EPCRA) Title III, Section 313; and any other industrial or commercial discharge the permittee determines are contributing a substantial pollutant loading to the small MS4. This requirement is only applicable to Level 4 MS4s, and does not apply to the City of Schertz, a Level 3 MS4.
8. Authorization for Construction Activities where the Small MS4 is the Site Operator - The development of this MCM for construction activities, where the small MS4 is the construction site operator, is optional and provides an alternative to the MS4 operator seeking coverage under TPDES CGP, TXR150000, for each construction activity. Permittees that choose to develop and implement this MCM will be authorized to discharge stormwater and certain non-stormwater from construction activities only where the MS4 operator meets the definition of a construction site operator. This MCM only authorizes the small MS4 operator and does not provide authorization for other construction site operators at a municipal project. This MCM is optional, and the City of Schertz will not be seeking approval for this MCM in this permit.

For each MCM, the City of Schertz must provide information in this SWMP update documenting the development and implementation of the program. At a minimum, the documentation must include: A list of any public or private entities assisting with the development or implementation of the SWMP; If applicable, a list of all MS4 operators contributing to the development and implementation of the SWMP, including a clear description of the contribution; A list of all BMPs and measurable goals for each of the MCMs; A schedule for the implementation of all SWMP requirements. The schedule must include, as appropriate, the months and years in which the permittee will undertake the required actions, including interim milestones and the frequency of the action throughout the permit term. A description of how each measurable goal will be evaluated; and A rationale statement that addresses the overall program, including how the BMPs and measurable goals were selected. Sections 5 through 10 of this SWMP update provide the compliance documentation for these requirements.

Based off the 2024 Texas Integrated Report of Surface Water Quality for Clean Water Act Sections 305(b) and 303(d), the City of Schertz stormwater outfalls discharge into two impaired stream segments. These impaired stream segments include: the Dry Comal Creek (Segment 1811A) and the Lower Cibolo Creek (Segment 1902).

A portion of the Edwards Aquifer Transition Zone is located within the northwest corner of the City of Schertz city limits. Although the city does not anticipate any regulated activities within this area, an approved Water Pollution Abatement Plan (WPAP) would be required and included in all construction stormwater pollution prevention plans (SWPPP) by the city for all construction activity that discharges, or may potentially discharge, from the regulated MS4 within the Edwards Aquifer Recharge Zone, Contributing Zone, or Contributing Zone within the Transition Zone.

2.3 EXISTING AUTHORITY AFFECTING PERMIT

The City of Schertz is governed by a council-manager form of government where the City Council sets city policy, and the City Manager is responsible for city operations. The City of Schertz UNIFIED DEVELOPMENT CODE City of SCHERTZ, TEXAS Codified through Ordinance No. 24-S-20, enacted June 18, 2024. (Supp. No. 9), provides several codes under Article 13, Section 21, Land Disturbing Activities and Drainage, that support the development of this SWMP update:

- Sec. 21.13.1. - Clearing and Grading: Requirement for Grading and Clearing Permit.
- Sec. 21.13.2. - Construction Storm Water Management: The intent of the Construction Storm Water Management Ordinance is to provide for the health, safety, and general welfare of the citizens of the City of Schertz by guiding, regulating, and controlling the design, construction, use, and maintenance of any development or other activity that disturbs or breaks the topsoil or results in the movement of earth in the City.
- Sec. 21.13.4. – Drainage: Storm Water Management Plan.
- Sec. 21.13.5. - Control of Storm Water Run-off: The purpose of the Ordinance for the Control of Storm Water Run-off is to establish minimum stormwater management requirements and controls to protect and safeguard the general health, safety, and welfare of the public residing in watersheds within this jurisdiction.
- Sec. 21.13.6. - Illicit Discharge and Connection: The purpose and intent of this Section is to provide for the health, safety, and general welfare of the citizens of the City of Schertz through the regulation of non-storm water discharges to the storm drainage system as required by the Texas Pollutant Discharge Elimination System (TPDES) permit and state law. The objectives are to regulate the contribution of pollutants to the storm drainage system by storm water discharges of any user, to prohibit illicit discharges and connections to the storm drainage system, to establish legal authority to carry out all inspection, surveillance, and monitoring procedures necessary to ensure compliance with this Ordinance, and to establish penalties for violations of this Ordinance. The provisions of this Ordinance shall be interpreted and applied as the minimum requirements for the promotion of public health, safety and general welfare.

2.4 RECORDKEEPING

The 2024 general permit, TXR040000, requires that the City of Schertz shall:

1. Retain all records, a copy of the current TPDES general permit, and records of all data used to complete the application of the NOI for this general permit and satisfy the public participation requirements, for a period of at least three (3) years, or for the remainder of the term of this general permit, whichever is longer. This period may be extended at the request of the executive director at any time.
2. The city shall submit the records to the executive director only when specifically asked to do so. The SWMP required by this general permit (including a copy of the general permit) must be retained at a location accessible to the TCEQ.
3. The city shall make the NOI and the SWMP available to the public at reasonable times during regular business hours, if requested to do so in writing. Copies of the SWMP must be made available within ten (10) working days of receipt of a written request. Other records must be provided in accordance with the Texas Public Information Act. However, all requests for records from federal facilities must be made in accordance with the Freedom of Information Act.

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4. 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 city.

2.5 NOTICE OF NON-COMPLIANCE

According to 30 TAC § 305.125(9), any noncompliance which may endanger human health or safety, or the environment, must be reported by the City of Schertz to the TCEQ. Reports of such information must be provided orally or by fax to the TCEQ Regional Office within 24 hours of becoming aware of the noncompliance. A written report must be provided by the city to the appropriate TCEQ Regional Office and to the TCEQ Enforcement Division (MC-224) within five working days of becoming aware of the noncompliance. The written report must contain:

1. A description of the noncompliance and its cause;
2. The potential danger to human health or safety, or the environment;
3. The period of noncompliance, including exact dates and times;
4. If the noncompliance has not been corrected, the anticipated time it is expected to continue; and
5. Steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance, and to mitigate its adverse effects.

If the City of Schertz 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, the city shall promptly submit the facts or information to the executive director.

2.6 ANNUAL REPORT

The City of Schertz shall submit a concise annual report to the executive director within 90 days of the end of each reporting year and must address the previous reporting year. Based on an MS4 permit year ending day of January 24th, the City of Schertz must submit each annual report by April 24th. The city shall also make a copy of the annual report readily available for review by TCEQ personnel upon request. The annual report must 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. If applicable, a summary of any activities taken to address the discharge to impaired waterbodies, including any sampling results and a summary of the city's BMPs used to address the pollutant of concern;
4. A summary of the stormwater activities the city plans to undertake during the next reporting year;
5. Proposed changes to the SWMP, including changes to any BMPs or any identified measurable goals that apply to the program elements;

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6. Description and schedule for implementation of additional BMP's that may be necessary, based on monitoring results, to ensure compliance with applicable TMDLs and implementation plans. For waters that are listed as impaired after discharge authorization, include a list of such waters and the pollutant(s) causing the impairment, and a summary of any actions taken to comply with the requirements; and
7. The number of construction activities that occurred within the jurisdictional area of the city (as noticed to the city by the construction operator), and that were not authorized under the 7th MCM.

2.7 SWMP CHANGES

The City of Schertz can make changes to this SWMP update through the Notice Of Change (NOC) process. If changes are made after TCEQ approval of the NOI and SWMP, they may be amended by submittal and approval of NOC unless the changes are non-substantial and do not change terms and conditions in the SWMP. Changes that do not require an NOC include:

- Adding (but not subtracting or replacing) components, controls, or requirements to the SWMP;
- Adding areas such as by annexing land, or otherwise acquire additional land that expands the boundary of the MS4, or subtracting areas, such as by de-annexing lands;
- Adding impaired water bodies that are identified; and
- Minor modifications to the SWMP that include administrative or non-substantial changes as follows:
 - A change in personnel, or a reorganization of departments responsible for implementing the SWMP;
 - Minor clarifications to the existing BMPs;
 - Correction of typographical errors; and
 - Other similar administrative or non-substantive comments.

Changes that require an NOC include:

- Replacing a less effective or infeasible BMP specifically identified in the SWMP with an alternative BMP, (for example, replacing a structural BMP with a non-structural BMP would be considered a replacement). The SWMP update must include documentation of the following:
 - An analysis of why the BMP is ineffective or infeasible (including cost prohibitive);
 - Expectations of the effectiveness of the replacement BMP; and
 - An analysis of why the replacement BMP is expected to achieve the goals of the BMP to be replaced;
- Requirement for more frequent monitoring or reporting by the permittee; and
- Interim compliance date change in a schedule of compliance, provided the new date is not more than 120 days after the date specified in the existing permit and does not interfere with attainment of the final compliance date requirement.

Additional changes may require an NOC and public notice as identified in the updated general permit.

3. DEVELOPMENT OF SWMP

The City of Schertz developed this SWMP update to comply with the 2024 TPDES Phase II (Small) Municipal Separate Storm Sewer System General Permit, TXR040000, requirements for stormwater discharges and certain non-stormwater discharges. This SWMP update is intended to aid the city's efforts to reduce stormwater pollutants from the city's storm sewer system to the maximum extent practicable, as required by the updated general permit.

This SWMP update describes specific actions that will be taken over the upcoming five-year period to reduce pollutants to protect the city's stormwater quality. The specific activities to be implemented, BMPs, have been developed for each of the selected MCMs required by the updated general permit. This SWMP update also sets measurable goals and provides a schedule for the implementation of each BMP. Implementation of the selected BMPs is expected to reduce pollutant discharge into the City of Schertz's waterways.

4. DISCHARGES DIRECTLY TO WATER QUALITY IMPAIRED WATER BODIES WITHOUT AN APPROVED TMDL

Permittees with discharges of the pollutant(s) of concern to impaired water bodies for which there is not a TCEQ and EPA approved Total Maximum Daily Load (TMDL) are required to determine if the discharges from the permittee are a source of impairment. Based off the 2024 Texas Integrated Report of Surface Water Quality for Clean Water Act Sections 305(b) and 303(d), the City of Schertz stormwater outfalls discharge into two impaired stream segments. These impaired stream segments include: the Dry Comal Creek (Segment 1811A) and the Lower Cibolo Creek (Segment 1902). An exhibit showing the impaired stream segments, City of Schertz stormwater outfalls, and TCEQ water quality monitoring stations is provided in Appendix B of this SWMP update.

The City of Schertz, and its project partners, worked together to develop and implement Watershed Protection Plans (WPPs) to address bacteria concerns in the Dry Comal Creek and Cibolo Creek watersheds. Watershed Protection Plans are community-developed documents that identify potential sources of water body impairment throughout a watershed and provide a framework for implementation strategies to reduce pollution and improve overall water quality in streams and rivers. Watershed Protection Plan participation is voluntary; by participating in the WPP developed BMP strategies, a community could avoid the potential requirements that come with an approved TMDL implementation plan. This SWMP update was developed with the intention of complying with the BMPs identified in both WPPs.

4.1 DRY COMAL CREEK AND COMAL RIVER WPP

Historical data identified Dry Comal Creek (Segment 1811A) as impaired for E.coli bacteria. Segment 1811A was initially included on the 303(d) list in 2010. A preliminary bacteria source tracking (BST) analysis was conducted in 2013 to help identify potential bacteria sources on the Dry Comal Creek. The project team is utilizing all existing water quality data from the Dry Comal Creek to support water quality modeling efforts and to help identify bacteria loading trends. The project team produced a draft WPP that was presented to the stakeholders at the meeting on June 22nd, 2017. The draft WPP was submitted to TCEQ for review on August 23, 2017. The final version of the WPP was approved by the EPA in mid-September 2018.

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Phase One of the Dry Comal Creek WPP was initiated in August 2015 and included efforts to characterize the watershed, assemble a working stakeholder group and define bacteria load reductions needed to meet applicable water quality standards for bacteria. Phase Two involved continued stakeholder involvement, identification of bacteria management measures, and development of a watershed protection plan. The current implementation phase, which began in September 2018, will take the work plans developed during Phase Two and put those plans into action.

The Mid and Lower Cibolo Creek WPP was completed in May 2019. TCEQ has listed the Lower Cibolo Creek as an impaired water body for primary contact recreation due to elevated levels of E. coli bacteria. The watershed also has concerns for elevated levels of nitrate, total phosphorus and depressed dissolved oxygen levels, which can hinder aquatic life. The City of Schertz worked with local partners with the development of the WPP, which identified the best management practices to achieve the water quality improvement and watershed protection goals identified by stakeholders.

4.2 RECOMMENDATIONS TO MEET MINIMUM PERMIT REQUIREMENTS

Based on Part II, Section D of the 2024 TPDES Phase II (Small) Municipal Separate Storm Sewer System General Permit, TXR040000, the City of Schertz shall perform the following activities to meet permit requirements:

1. The permittee shall determine whether the small MS4 may be a source of the pollutant(s) of concern by referring to the CWA §303(d) list and then determining if discharges from the MS4 would be likely to contain the pollutant(s) of concern at levels of concern.
 - To meet the requirement, the city shall start planning to collect baseline water quality sampling data, at regular intervals, to determine if discharges from the city would be likely sources of bacteria within the Dry Comal Creek and Cibolo Creek.
2. If the permittee determines that the small MS4 may discharge the pollutant(s) of concern to an impaired water body without an approved TMDL, the permittee shall ensure that the SWMP includes focused BMPs, along with corresponding measurable goals, that the permittee will implement, to reduce, the discharge of pollutant(s) of concern that contribute to the impairment of the water body.
 - To meet the requirement, the city shall start planning to collect baseline water quality sampling data, at regular intervals, to determine if discharges from the city would be likely sources of bacteria within the Dry Comal Creek and Cibolo Creek. However, the City of Schertz currently utilizes targeted BMPs to address the discharge of bacteria in the impaired waterways.
3. In addition, the permittee shall submit an NOC to amend the SWMP in accordance with Part II.E.6 to include any additional BMPs to address the pollutant(s) of concern. This requirement does not apply to BMPs implemented to address impaired waters that are listed after permit authorization pursuant to Part II.D.4.
 - To meet the requirement, the city shall start planning to collect baseline water quality sampling data, at regular intervals, to determine if discharges from the city would be likely sources of bacteria within the Dry Comal Creek and Cibolo Creek. However, the City of Schertz currently utilizes targeted BMPs to address the discharge of bacteria in the impaired waterways.
4. Where the impairment is for bacteria, the permittee shall identify potential significant sources and develop and implement focused BMPs for those sources. The permittee may implement the BMPs listed in Part II.D.4(a)(5) or proposed alternative BMPs as appropriate.

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- The city will continue to aim to reduce discharges of bacteria through the BMPs listed in this SWMP update.
5. The annual report must include information on compliance with this section, including results of any sampling conducted by the permittee.
- The city has included information on compliance with this section in the submitted annual reports.

MCM	BMP No.	BMP	Include in SWMP?
MCM 1: Public Education and Outreach	BMP 1.01	Information on the MS4 operator's website.	Yes
	BMP 1.02	Social media posts, social media campaign.	Yes
	BMP 1.03	Maintain or mark storm drains and inlets with, "No Dumping – Drains to Creek" or a similar message.	Yes
	BMP 1.04	Media/advertising campaign/public service announcements in areas of high visibility: Billboard/poster; Bus shelter/bench; radio/television/movie theatre; and kiosks.	No
	BMP 1.05	Publish articles in local newspaper or newsletter, may be electronic.	Yes
	BMP 1.06	Fact sheets/brochures/ utility bill inserts/door hangers.	No
	BMP 1.07	Permanent stormwater related signage.	Yes
	BMP 1.08	Promote, host, or develop educational meetings, seminar, or trainings.	No
	BMP 1.09	Targeted education campaign via mail, email, or in person.	No
MCM 2: Public Involvement/Participation	BMP 2.01	Stream/lake or watershed clean-up events; litter/trash clean-up events such as Adopt-A-Highway, Adopt-A-Spot, Adopt-A-Street, Adopt-A-Stream, etc.	Yes
	BMP 2.02	Habitat improvement; Tree planting; Invasive Vegetation removal; Stream restoration.	No
	BMP 2.03	Volunteer water quality monitoring such as Texas Stream Team.	No
	BMP 2.04	Stormwater related speaker series.	Yes
	BMP 2.05	MS4 area-wide stormwater survey for input on program implementation.	No

	BMP 2.06	Hold events to train residents, or work a project for homeowner associations (HOAs), or other public groups to cover stormwater topics such as: Building rain barrels; Fertilizer application training; Rain garden/bio retention creation or maintenance; How to recognize illicit discharge activities and communicate observations to appropriate MS4 staff.	Yes
	BMP 2.07	Educational display/booth at a school, public event, or similar event to provide information or displays that work to improve public understanding of issues related to water quality.	Yes
	BMP 2.08	Public meeting for input on the program implementation such as a city council meeting, board meeting, or stakeholder meeting.	No
MCM 3: Illicit Discharge Detection and Elimination (IDDE)	BMP 3.01	Maintain a current and accurate MS4 map as described in Part IV.D.3.(c)(1) of the General Permit.	Yes
	BMP 3.02	Conduct training for all the permittee's field staff as described in Part IV.D.3.(c)(2) of the General Permit.	Yes
	BMP 3.03	Maintain and publicize a public reporting method for the public to report illicit discharges, illegal dumping, or water quality impacts associated with discharges into or from the small MS4 such as a reporting hotline, online form, or other similar mechanism as described in Part IV.D.3.(c)(3) of the General Permit.	Yes
	BMP 3.04	Develop and maintain procedures for responding to illicit discharges, illegal dumping, and spills as described in Part IV.D.3.(c)(4) of the General Permit.	Yes
	BMP 3.05	Source investigation and elimination of illicit discharges and illegal dumping as described in Part IV.D.3.(c)(5) of the General Permit.	Yes

	BMP 3.06	Corrective action to eliminate illicit discharges and illegal dumping as described in Part IV.D.3.(c)(5) of the General Permit.	Yes
	BMP 3.07	Inspection Procedures as described in Part IV.D.3.(c)(6) of the General Permit.	Yes
	BMP 3.08	Inspections in response to complaints as described in Part IV.D.3.(c)(6) of the General Permit.	Yes
	BMP 3.09	Conduct follow-up investigations or field screenings when notified that a discharge has been eliminated.	Yes
MCM 4: Construction Site Stormwater Runoff Control	BMP 4.01	Develop and maintain an ordinance or other regulatory mechanism as described in Part IV.D.4.(a) of the General Permit.	Yes
	BMP 4.02	Prohibit discharges as described in Part IV.D.4.(b)(2) of the General Permit.	Yes
	BMP 4.03	Maintain and implement site plan review procedures that describe which plans will be reviewed as well as when an operator may begin construction as described in Part IV.D.4.(b)(3) of the General Permit.	Yes
	BMP 4.04	Implement procedures for inspecting large and small construction projects as described in Part IV.D.4.(b)(4) of the General Permit.	Yes
	BMP 4.05	Conduct construction site inspections as described in Part IV.D.4.(b)(4) of the General Permit.	Yes
	BMP 4.06	Develop, implement, and maintain procedures for receipt and consideration of information submitted by the public as described in Part IV.D.4.(b)(5) of the General Permit.	Yes
	BMP 4.07	Conduct training for all the MS4 staff whose primary job duties are related to implementing the construction stormwater program as described in Part IV.D.4.(b)(6) of the General Permit.	Yes
	BMP 4.08	Maintain a Construction Site inventory as described in Part IV.D.4.(c) of the General Permit.	Yes

MCM 5: Post-construction Stormwater Management in New Development and Redevelopment	BMP 5.01	Develop and maintain an ordinance or other regulatory mechanism as described in Part IV.D.5.(a)(2) of the General Permit.	Yes
	BMP 5.02	Document and maintain records of enforcement actions and make them available for review by the TCEQ as described in Part IV.D.5.(b)(1) of the General Permit.	Yes
	BMP 5.03	Ensure the long term operation and maintenance of structural stormwater control measures installed as described in Part IV.D.5.(b)(2) of the General Permit.	Yes
MCM 6: Pollution Prevention and Good Housekeeping for Municipal Operations	BMP 6.01	Permittee-owned Facilities and Control Inventory as described by Part IV.D.6.(b)(1) of the General Permit.	Yes
	BMP 6.02	Training and Education as described in Part IV.D.6.(b)(2) of the General Permit.	Yes
	BMP 6.03	Disposal of Waste Material as described in Part IV.D.6.(b)(3) of the General Permit.	Yes
	BMP 6.04	Contractor Requirements and Oversight as described in Part IV.D.6.(b)(4) of the General Permit.	Yes
	BMP 6.05	Assessment of permittee-owned operations as described in Part IV.D.6.(b)(5)a of the General Permit.	Yes
	BMP 6.06	Identify pollutants of concern as described in Part IV.D.6.(b)(5)b of the General Permit.	Yes
	BMP 6.07	Pollution Prevention Measures as described in Part IV.D.6.(b)(5)c of the General Permit.	Yes
	BMP 6.08	Inspection of Pollution Prevention Measures as described in Part IV.D.6.(b)(5)d of the General Permit.	Yes
	BMP 6.09	Structural Control Maintenance as described by Part IV.D.6.(b)(6) of the General Permit.	Yes
MCM 6: Additional Requirements for Level 3 permits	BMP 6.10	Storm Sewer System Operation and Maintenance Program.	Yes
	BMP 6.11	Storm Sewer System Operation and Maintenance of Problem Areas.	Yes

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	BMP 6.12	Operation and Maintenance Program to Reduce Discharges of Pollutants from Roads.	Yes
	BMP 6.13	Mapping of Facilities.	Yes
	BMP 6.14	Assessment of Facilities' Pollutant Discharge Potential.	Yes
	BMP 6.15	Identification of High Priority Facilities.	Yes
	BMP 6.16	Documentation of Assessment Results.	Yes
	BMP 6.17	Development of Facility-Specific Standard Operating Procedures.	Yes
	BMP 6.18	Stormwater Controls for High Priority Facilities, General Good Housekeeping.	Yes
	BMP 6.19	Stormwater Controls for High Priority Facilities, Deicing and anti-icing material storage.	Yes
	BMP 6.20	Stormwater Controls for High Priority Facilities, Fueling and Vehicle Maintenance.	Yes
	BMP 6.21	Stormwater Controls for High Priority Facilities, Equipment and Vehicle Washing.	Yes
	BMP 6.22	Inspections.	Yes

5. MINIMUM CONTROL MEASURE NO. 1 – PUBLIC EDUCATION AND OUTREACH

The City of Schertz shall implement a public education and outreach program to distribute educational materials to the community and conduct equivalent outreach about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff.

5.1 BMP 1.01 INFORMATION ON THE MS4 OPERATOR WEBSITE

The city will maintain a webpage for the storm water utility operations and post similar articles to those in print.

Measurable Goals:

Maintain a webpage with current and accurate information and working links. All links shall be checked, and the page shall be updated as necessary at a minimum of once annually. The webpage shall be maintained for the full year, each year.

Evaluation:

The city owns, maintains, and once a year updates a Storm Water Management webpage (<https://www.schertz.com/167/Storm-Water-Management>) that includes the annual report, resources for homeowners and businesses, and other information.

5.2 BMP 1.02 SOCIAL MEDIA POSTS, SOCIAL MEDIA CAMPAIGN

The city will maintain a webpage with current and accurate information and working links.

Measurable Goals:

Posts addressing ways attendees can minimize or avoid adverse stormwater impacts and practices to improve the quality of stormwater runoff. The messages shall be seasonally appropriate. The city shall make a minimum of one post per quarter and all quarterly posts must be visible by attendees for the full year, each year.

Evaluation:

The City will post the required number of times each year on the appropriate social media platform. The posts shall address all measurable goals and serve as an effective tool to communicate with the community.

5.3 BMP 1.03 MAINTAIN OR MARK STORM DRAINS AND INLETS

The city shall maintain or mark storm drains and inlets with, “No Dumping – Drains to Creek” or a similar message.

Measurable Goals:

Use a combination of City staff and/or volunteer organizations to placard, stencil, or paint a minimum of 10% of all known stormwater inlets in either high-impact areas identified by the city or impairment watersheds within the MS4 area each year.

Where all known stormwater inlets have been marked, inspect, and maintain the markers for a minimum of 15% of all known stormwater inlets in either high-impact areas identified by the city or impairment watersheds within the MS4 area each year.

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Require installation of “Drains to Creek” logo manhole covers on 100% of new developments.

Evaluation:

Update the city’s design standards to include requirements for marking all new storm drains and inlets with “No Dumping – Drains to Creek” messaging. Utilize city GIS inventory of accepted infrastructure to track the installation of markers on a yearly basis.

5.4 BMP 1.04 MEDIA/ADVERTISING CAMPAIGN/ PUBLIC SERVICE ANNOUNCEMENT IN AREAS OF HIGH VISIBILITY

Develop billboard/poster; bus shelter/bench; radio/television/movie theatre; and kiosks advertising campaign.

Measurable Goals:

Advertisement must be active for a minimum of three weeks each year; or must have an estimated public exposure for the duration of the advertising campaign that is equal to twice the population for the city area.

Evaluation:

Three weeks of active advertising from one department is not as conducive as the city's other publications. Therefore, the city will not utilize this BMP.

5.5 BMP 1.05 PUBLISH ARTICLES IN LOCAL NEWSPAPER OR NEWSLETTER

Develop article topics that are group specific and address activities or pollutants of concern at a seasonally appropriate time.

Measurable Goals:

A minimum of two articles must be published or emailed to target audience groups each year.

Evaluation:

Two articles containing relevant information will be published yearly online and through the Schertz Magazine.

5.6 BMP 1.06 FACT SHEETS/ BROCHURES/ UTILITY BILL INSERTS

Develop material topics that are group specific and address activities or pollutants of concern.

Measurable Goals:

Fact sheets, brochures, bill inserts, door hangers, or handouts shall be distributed each year for at least 75% of the intended audience.

Evaluation:

Distributing paper materials does not make financial or ecological sense to the city. Due to the effectiveness of reaching 75% being a requirement, the environmental impact of such material outweighs the benefits. Therefore, the city will not utilize this BMP.

5.7 BMP 1.07 PERMANENT STORMWATER RELATED SIGNAGE

Place signage in a location where the message is relevant, and highly visible to the target audience.

Measurable Goals:

Signage will count as an annual BMP for the year it was put in place and for each subsequent year of this permit cycle as long as each of those years, the city inspects and maintains, as necessary, 100% of the signage once annually.

Evaluation:

“No Dumping” signs are posted in relevant/highly visible locations.

5.8 BMP 1.08 PROMOTE, HOST, OR DEVELOP, EDUCATIONAL MEETINGS

Hold, host, or promote a minimum of one event for level 1 and 2 MS4s or two events for level 3 and 4 MS4s annually.

Measurable Goals:

The events shall address ways attendees can minimize or avoid adverse impacts to stormwater or practices to improve the quality of stormwater runoff.

Evaluation:

Due to attendance likely to be low, hosting two successful events would not be as effective as other BMPs. Therefore, the city will not utilize this BMP.

5.9 BMP 1.09 TARGETED EDUCATION CAMPAIGN VIA MAIL, EMAIL, OR IN PERSON

Minimum of one campaign annually distributed to at least 75% of the intended audience, or with a specific event advertised to at least 75% of the intended audience.

Measurable Goals:

Develop and implement a tracking system to estimate what percentage of the intended audience is reached for determining BMP effectiveness.

Evaluation:

Creating a campaign would not be as effective as other BMPs. Therefore, the city will not utilize this BMP.

6. MINIMUM CONTROL MEASURE NO. 2 – PUBLIC INVOLVEMENT/ PARTICIPATION

The City of Schertz shall involve the public, and, at minimum, comply with any state and local public notice requirements in the planning and implementation activities related to developing and implementing the SWMP. The city must create opportunities, or support activities that are coordinated by citizen groups, for residents and others to become involved with the SWMP. The activities/BMPs must demonstrate an impact on stormwater runoff by improving water quality.

6.1 BMP 2.01 STREAM/LAKE OR WATERSHED CLEAN UP EVENTS

Host or support at a minimum one event for level 1 and 2 MS4s or two events for level 3 and 4 MS4s annually.

Measurable Goals:

To be considered an event, the land area cleaned must be a minimum of two acres, or 400 yards of stream/streambank/riparian area, or two miles of roadside. These may be combined (such as one acre of land and 200 yards of stream).

Evaluation:

The city currently has local creek clean up events multiple times per year.

6.2 BMP 2.02 HABITAT IMPROVEMENT

Host or support at a minimum one event for level 1 and 2 MS4s or two events for level 3 and 4 MS4s annually.

Measurable Goals:

To be considered an event, the project must be a minimum of 0.5 acres or 25 yards. An event may take place in streams, parks, areas adjacent to public waterways, or other green space. An event may be a combination of locations and areas.

Evaluation:

Tree planting/vegetation removal events are likely not going to have the same amount of attendance compared to the City's creek cleaning events. Therefore, the city will not utilize this BMP.

6.3 BMP 2.03 VOLUNTEER WATER QUALITY MONITORING

Host or support a minimum one event annually.

Measurable Goals:

To be considered an event, the monitoring must be conducted at minimum once each year.

Evaluation:

The city will not utilize this BMP.

6.4 BMP 2.04 STORMWATER RELATED SPEAKER SERIES

Provide or support a minimum of one session for level 1 and 2 MS4s or two sessions for level 3 and 4 MS4 each year.

Measurable Goals:

These sessions may be different speakers or audiences.

Evaluation:

The city plans to hosts two sessions a year. Descriptions of the sessions will be included in the annual report.

6.5 BMP 2.05 MS4 AREA-WIDE STORMWATER SURVEY

Provide or support a minimum of one public survey annually for input on the program implementation to be distributed to at least 75% of the intended audience.

Measurable Goals:

Develop and implement a tracking system to estimate what percentage of the intended audience is reached for determining BMP effectiveness.

Evaluation:

In the past, surveys sent out to residents did not receive enough feedback. Therefore, the city will not utilize this BMP.

6.6 BMP 2.06 HOLD EVENTS TO TRAIN RESIDENTS, OR WORK A PROJECT FOR HOME OWNER ASSOCIATIONS

Events to cover stormwater topics such as:

- Building rain barrels; Fertilizer application training;
- Rain garden/bio retention creation or maintenance;
- How to recognize illicit discharge activities and communicate observations to appropriate city staff.

Measurable Goals:

Develop and implement a tracking system to estimate what percentage of the intended audience is reached for determining BMP effectiveness.

Evaluation:

The city shall document and log events on an annual basis.

6.7 BMP 2.07 EDUCATIONAL DISPLAY/ BOOTH AT A SCHOOL OR PUBLIC EVENT

Provide information or displays that work to improve public understanding of issues related to water quality.

Measurable Goals:

Provide or support one booth or display at a minimum annually. The booth or display must be staffed during the time which the event is open to the public.

Evaluation:

The city shall document and log all educational or public events on an annual basis.

6.8 BMP 2.08 PUBLIC MEETING FOR INPUT ON THE PROGRAM IMPLEMENTATION

Meeting shall gather input on the program implementation such as a city council meeting, board meeting, or stakeholder meeting.

Measurable Goals:

Host or support a minimum of one meeting annually for input on the program implementation to be advertised to at least 75% of the intended audience. Develop and implement a tracking system to estimate what percentage of the intended audience is reached for determining BMP effectiveness.

Evaluation:

Hosting a meeting would not guarantee attendance from our target audiences and developing a tracking system is not something that is currently feasible with the workload of several departments. Therefore, the city will not utilize this BMP.

7. MINIMUM CONTROL MEASURE NO. 3 – ILLICIT DISCHARGE DETECTION AND ELIMINATION

The City of Schertz shall develop, implement, and enforce a program to investigate, detect, and eliminate illicit discharges into the city. The program must include a plan to detect and address non-stormwater discharges, including illegal dumping to the city.

7.1 BMP 3.01 MAINTAIN A CURRENT AND ACCURATE MS4 MAP

The city has compiled its inventory of the MS4 outfalls which are shown in Appendix B.

Measurable Goals:

Review and update, as necessary, at least once annually to include features which have been added, removed, or changed.

Evaluation:

Maintain a log of items added to storm water GIS, layers to include location and date added.

7.2 BMP 3.02 CONDUCT TRAINING FOR ALL THE PERMITEE'S FIELD STAFF

Training may be conducted in person or using self-paced training materials such as videos or reading materials.

Measurable Goals:

Conduct a minimum of one training annually for 100% of MS4 field staff that may come into contact with or otherwise observe an illicit discharge, illegal dumping, or illicit connection to the small MS4 as part of their normal job responsibilities.

Evaluation:

The city provides training for Public Works and Engineering, this will be expanded to Neighborhood Services.

7.3 BMP 3.03 MAINTAIN AND PUBLICIZE A PUBLIC REPORTING METHODS

Maintain and publicize a public reporting method for the public to report illicit discharges, illegal dumping, or water quality impacts associated with discharges into or from the small MS4 such as a reporting hotline, online form, or other similar mechanism.

Measurable Goals:

Maintain a minimum of one public reporting mechanism 100% of the time during the permit term. Publicize the public reporting mechanism a minimum of two times annually in a method designed to reach the majority of the intended audience. Develop and implement a tracking system to estimate what percentage of the intended audience is reached for determining BMP effectiveness. In addition, if the city has a public website, the public reporting mechanism must be publicized on the public website 100% of the time during the permit term.

Evaluation:

The city established a hotline for public reporting (311), and a web complaint option. Both of these are advertised in the Schertz Magazine and social media accounts.

7.4 BMP 3.04 DEVELOP AND MAINTAIN PROCEDURES FOR RESPONDING TO REPORTS

Develop and maintain procedures for responding to illicit discharges, illegal dumping, and spills.

Measurable Goals:

Review and update the procedures at least once annually to address changes and make improvements to the established procedures where applicable.

Evaluation:

The city will develop a Standard Operating Procedure (SOP), it will be reviewed annually to assess effectiveness.

7.5 BMP 3.05 SOURCE INVESTIGATION AND ELIMINATION

Source investigation and elimination of illicit discharges and illegal dumping.

Measurable Goals:

Respond to 100% of known illicit discharges and illegal dumping incidents each year to investigate sources. Respond to 100% of high priority discharges each year, such as sanitary sewer discharges within 24 hours. Notify TCEQ immediately of 100% of illicit flows believed to be an immediate threat to human health or the environment throughout the permit term.

Evaluation:

The city shall document and log all illegal dumping incidents, and city response, on an annual basis.

7.6 BMP 3.06 CORRECTIVE ACTION TO ELIMINATE ILICIT DISCHARGES AND DUMPING

Corrective action to eliminate illicit discharges and illegal dumping.

Measurable Goals:

For 100% of illicit discharges or illegal dumping where a source has been determined, notify the responsible party of the problem within 24 hours. Require the responsible party to perform all necessary corrective actions to eliminate the illicit discharge.

Evaluation:

The city will develop a SOP, it will be reviewed annually to ensure success.

7.7 BMP 3.07 INSPECTION PROCEDURES

Inspection Procedures.

Measurable Goals:

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Storm Water Management Plan

Review and update the procedures at least once annually to address changes and make improvements to the established procedures where applicable.

Evaluation:

The city will develop a SOP, it will be reviewed annually to ensure success.

7.8 BMP 3.08 INSPECTIONS IN RESPONSE TO COMPLAINTS

Inspections in response to complaints.

Measurable Goals:

Conduct inspections in response to 100% of complaints each year according to the established procedures. Conduct follow-up inspections in 100% of cases each year where necessary as described in the established procedures.

Evaluation:

The city will develop a SOP, it will be reviewed annually to ensure success.

7.9 BMP 3.09 CONDUCT FOLLOW UP INVESTIGATIONS OR FIELD SCREENINGS

Conduct follow-up investigations or field screenings when notified that a discharge has been eliminated.

Measurable Goals:

Conduct follow-up investigations or field screening in response to 100% of notifications each year. Complete the follow-up investigations within five business days, on average.

Evaluation:

The city will develop a SOP, it will be reviewed annually to ensure success.

8. MINIMUM CONTROL MEASURE NO. 4 – CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

The City of Schertz shall develop, implement, and enforce a program requiring operators of small and large construction activities to select, install, implement, and maintain stormwater control measures that prevent illicit discharges to the MEP. The program must include the development and implementation of an ordinance or 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.

8.1 BMP 4.01 DEVELOP AND MAINTAIN AN ORDINANCE OR REGULATORY MECHANISM

Develop and maintain an ordinance or other regulatory mechanism.

Measurable Goals:

Review and update the ordinance or other regulatory mechanism at least once during the permit term to address changes and make improvements to the ordinance where applicable.

Evaluation:

City of Schertz
Storm Water Management Plan

The city has developed stormwater design and construction standards that are included in the City of Schertz Public Works Design Guide.

The city shall review the requirements yearly and document any adopted revisions.

8.2 BMP 4.02 PROHIBIT DISCHARGES

Prohibit discharges.

Measurable Goals:

Develop and maintain an ordinance or other regulatory mechanism to prohibit these discharges. Review and update the ordinance or other regulatory mechanism at least one time during the permit term to address changes and make improvements to the ordinance where applicable.

Evaluation:

The city has developed stormwater design and construction standards that are included in the City of Schertz Public Works Design Guide. The city shall review the requirements yearly and document any adopted revisions.

8.3 BMP 4.03 MAINTAIN AND IMPLEMENT SITE PLAN REVIEW PROCEDURES

Maintain and implement site plan review procedures that describe which plans will be reviewed as well as when an operator may begin construction.

Measurable Goals:

Review and update site plan review procedures at least one time annually to address changes and make improvements to the established procedures where applicable. Implement site plan review procedures for 100% of new construction site plans received each year.

Evaluation:

The city has developed site plan review procedures that are included in the City of Schertz Unified Development Code. The city shall review the requirements yearly and document any adopted revisions.

8.4 BMP 4.04 IMPLEMENT PROCEDURES FOR INSPECTING CONSTRUCTION PROJECTS

Implement procedures for inspecting large and small construction projects.

Measurable Goals:

Review and update inspection procedures at least one time annually to address changes and make improvements to the established procedures where applicable.

Evaluation:

The city has developed construction inspection procedures. The city shall review the procedures yearly and document any adopted revisions.

8.5 BMP 4.05 CONDUCT CONSTRUCTION SITE INSPECTIONS

Conduct construction site inspections.

Measurable Goals:

Conduct inspections at a minimum of 80% of active construction sites annually according to the established procedures. Each year, conduct follow-up inspections in 100% of cases where necessary as described in the established procedures.

Evaluation:

The city shall maintain a copy of all inspection reports, for 100% of eligible construction sites.

8.6 BMP 4.06 DEVELOP, IMPLEMENT, AND MAINTAIN PROCEDURES FOR RECEIPT AND CONSIDERATION OF INFORMATION SUBMITTED BY THE PUBLIC

Develop, implement, and maintain procedures for receipt and consideration of information submitted by the public.

Measurable Goals:

Review and update procedures for the receipt and consideration of information submitted by the public at least once annually to address changes and make improvements to the established procedures where applicable. Maintain one webpage, hotline, or similar method for receipt of information submitted by the public throughout the permit term.

Evaluation:

The city shall maintain a log of information submitted by the public related to construction site stormwater runoff concerns, as well as follow-up documentation by the city.

8.7 BMP 4.07 CONDUCT TRAINING FOR ALL THE MS4 STAFF

Conduct training for all the city staff whose primary job duties are related to implementing the construction stormwater program.

Measurable Goals:

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

Evaluation:

Maintain a list of dates for training and the names of employees in attendance.

Maintain a copy of the training materials used during the training event.

8.8 BMP 4.08 MAINTAIN A CONSTRUCTION SITE INVENTORY

Maintain a Construction Site inventory.

Measurable Goals:

Maintain an annual inventory of 100% of TPDES permitted active public and private construction sites in the city area, that result in a total land disturbance of one or more acres or that result in a total land disturbance of less than one acre if part of a larger common plan or development or sale.

Evaluation:

The city shall maintain an annual inventory of all active construction permits.

9. MINIMUM CONTROL MEASURE NO.5 – POST-CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

The City of Schertz 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 city 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.

The City of Schertz shall use, to the extent allowable under state, federal, and local law and local development standards, an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects. The city shall establish, implement, and enforce a requirement that owners or operators of new development and redeveloped sites design, install, implement, and maintain a combination of structural and non-structural BMPs appropriate for the community and that protects water quality. If the construction of permanent structures is not feasible due to space limitations, health and safety concerns, cost effectiveness, or highway construction codes, the permittee may propose an alternative approach to TCEQ.

9.1 BMP 5.01 DEVELOP AND MAINTAIN AN ORDINANCE OR OTHER REGULATORY MECHANISMS

Develop and maintain an ordinance or other regulatory mechanism.

Measurable Goals:

Review and update the ordinance or other regulatory mechanism at least one time during the permit term to address changes and make improvements to the ordinance where applicable.

Evaluation:

The city has developed stormwater design and construction standards that are included in the City of Schertz Public Works Design Guide. The city shall review the requirements yearly and document any adopted revisions.

9.2 BMP 5.02 DOCUMENT AND MAINTAIN RECORDS OF ENFORCEMENT ACTIONS

Document and maintain records of enforcement actions and make them available for review by TCEQ.

Measurable Goals:

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

Evaluation:

The city shall maintain a database of all enforcement actions on an annual basis.

9.3 BMP 5.03 ENSURE LONG TERM OPERATION AND MAINTANENCE OF STRUCTURAL STORMWATER CONTROL MEASURES INSTALLED

Ensure the long-term operation and maintenance of structural stormwater control measures installed.

Measurable Goals:

Each year, implement a maintenance plan and schedule established by the city addressing 100% of stormwater control measures where the city is responsible for maintenance. Each year, require 100% of the owners or operators of any new development or redeveloped sites to develop and implement a maintenance plan addressing maintenance requirement for any structural control measures installed on site. Require the site owner or operators to maintain documentation, such as a tracking log, onsite of 100% of the maintenance performed and made available for review by the city or TCEQ within 24 hours of the request.

Evaluation:

- Review 100% of construction plans (meeting land disturbance parameters) for SWPPPs meeting the currently adopted TXR150000 criteria.
- Inspect 100% of new BMPs added each year through public and private construction projects; and
- Inspect 20% of existing BMPs each year in accordance with established Long-term Maintenance Plans or City of Schertz applicable codes and ordinances.
- In year one, evaluate current ordinance 21.13.5 for adequacy regarding maintenance of post-construction BMPs and make changes if deemed appropriate.
- In years two through five, evaluate the written procedures for permitting and inspections of post-construction BMPs.

10. MINIMUM CONTROL MEASURE NO. 6 – POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

The City of Schertz 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.

10.1 BMP 6.01 PERMITEE-OWNED FACILITIES AND CONTROL INVENTORY

Permittee-owned Facilities and Control Inventory.

Measurable Goals:

Develop and maintain an annual inventory for 100% of the city owned and operated facilities and controls in the city area. Review and update the inventory at least one time annually to address changes or additions to the facilities and controls where applicable.

Evaluation:

The city prepared a Municipal Facility and Stormwater Control Inventory in 2021. The city shall review the inventory annually, and update the inventory, as needed, to address changes or additions to the facilities and controls.

10.2 BMP 6.02 TRAINING AND EDUCATION

The city will develop a program for informing and training employees in recognizing and reporting illicit discharges and connections to the MS4.

Measurable Goals:

Provide training for new employees on the identification and reporting of illicit discharges and other reporting requirements of the SWMP.

By end of permit year, review training program including materials and internal reporting forms and procedures.

Evaluation:

Maintain a list of dates of training and the names of employees in attendance. Maintain a copy of the training materials used during the training event.

10.3 BMP 6.03 DISPOSAL OF WASTE MATERIAL

Disposal of Waste Material.

Measurable Goals:

Ensure that 100% of waste from the MS4 is disposed of in accordance with 30 TAC Chapters 330 or 335, as applicable each year.

Evaluation:

The city has developed criteria to address the disposal of solid waste that are included in the City of Schertz Unified Development Code. The city shall review the requirements yearly and document any adopted revisions.

10.4 BMP 6.04 CONTRACTOR REQUIREMENTS AND OVERSIGHT

Contractor Requirements and Oversight.

Measurable Goals:

Each year, ensure that 100% of contractors hired by the city to perform maintenance activities on city-owned facilities is contractually required to comply with all of the stormwater control measures, good housekeeping practices, and facility-specific stormwater management operating procedures. Implement oversight procedures of contractor activities in 100% of contracts to ensure that contractors are using appropriate control measures and SOPs each year. Oversight procedures must be maintained on-site 100% of the time and made available for review by TCEQ within 24 hours of request.

Evaluation:

The city shall maintain a copy of the current vendor contracts.

10.5 BMP 6.05 ASSESMENT OF PERMITEE OWNED OPERATIONS

Assessment of city-owned operations.

Measurable Goals:

Evaluate 100% of Operation and Maintenance (O&M) activities, in conjunction with procedure reviews if appropriate, for their potential to discharge pollutants in stormwater annually including but not limited to: Road and parking lot maintenance, including such areas as pothole repair, pavement marking, sealing, and re-paving; Bridge maintenance, including such areas as re-chipping, grinding, and saw cutting; Cold weather operations, including plowing, sanding, and application of deicing and anti-icing compounds and maintenance of snow disposal areas; and Right-of-way maintenance, including mowing, herbicide and pesticide application, and planting vegetation.

Evaluation:

The city shall maintain a copy of the standard operating procedures developed to prevent pollutant discharges. When SDS sheets include spill prevention or contaminate procedures, these may be used in lieu of specific standard operating procedure development.

The city shall maintain a record of operations assessment as appropriate.

10.6 BMP 6.06 IDENTIFY POLLUTANTS OF CONCERN

Identify pollutants of concern.

Measurable Goals:

Identify pollutants of concern that could be discharged from all the operation and maintenance activities and maintain a list of 100% of the pollutants identified. Including for example, metals; chlorides; hydrocarbons such as benzene, toluene, ethyl benzene, and xylenes; sediment; and trash. Review and update the pollutants of concern list at least one time annually to address changes or additions to the operation and maintenance activities where applicable.

Evaluation:

The city shall maintain a copy of the standard operating procedures developed to prevent pollutant discharges. When SDS sheets include spill prevention or contaminate procedures, these may be used in lieu of specific standard operating procedure development.

The city shall maintain a record of operations assessment as appropriate.

10.7 BMP 6.07 POLLUTION PREVENTION MEASURES

Pollution Prevention Measure.

Measurable Goals:

Develop and implement a set of pollution prevention measures that will reduce the discharge of pollutants in stormwater from the city-owned operations. Implement at least two of the following pollution prevention measures: Replace at least 50% of the city's materials and chemicals with more environmentally friendly materials or methods by the end of the permit term; Track 100% of the application of deicing and anti-icing compounds in the city area and record the amount of compound used for each application annually; Use suspended tarps, booms, or vacuums to capture paint, solvents, rust, paint chips and other pollutants during 80% of regular bridge maintenance each year; and Place barriers around or conduct runoff away from 100% of deicing chemical storage areas to prevent discharge into surface waters each year.

Evaluation:

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The city shall track and log all applications of deicing and anti-icing agents used on an annual basis.

The city will use suspended tarps, booms, or vacuums to capture paint, solvents, rust, paint chips, and other pollutants during at least 80% of regular bridge maintenance each year.

10.8 BMP 6.08 INSPECTION OF POLLUTION PREVENTION MEASURES

Inspection of Pollution Prevention Measures.

Measurable Goals:

At least one time annually, visually inspect 100% of pollution prevention measures implemented at permittee-owned facilities to ensure they are working properly. Develop and maintain written procedures that describe the frequency of inspections and how they will be conducted. Review and update the inspection procedures at least one time annually to address changes or additions to the pollution prevention measures. Maintain a log of 100% of the inspections conducted annually and make the log available for review by the TCEQ within 24 hours of a request.

Evaluation:

The city shall visually inspect all pollution prevention measures implemented at city-owned facilities, documenting and maintaining a log of all inspections.

10.9 BMP 6.09 STRUCTURAL CONTROL MAINTENANCE

Structural Control Maintenance.

Measurable Goals:

At least once annually, perform maintenance of 100% of the structural controls which require maintenance. Maintenance must follow a plan and schedule developed by the city to be consistent with maintaining the effectiveness of the BMP. The city shall develop and maintain written procedures that define the frequency of inspections and how they will be conducted. Review and update the maintenance procedures at least one time annually to address changes or additions to the pollution prevention measures.

Evaluation:

- The City will annually identify needed maintenance on BMPs and perform maintenance deemed necessary.
- The City will annually review and update as appropriate the maintenance procedures used to maintain effectiveness of all BMPs.

10.10 BMP 6.10:

Storm Sewer System Operation and Maintenance Program.

Measurable Goals:

Develop and implement an operation and maintenance program to reduce to the MEP the collection of pollutants in catch basins and other surface drainage structures each year. Implement at least two of the following:

- Inspect at least 25% of the small MS4 owned and operated detention basins each year.

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- Inspect at least 20% of the small MS4 owned and operated stormwater inlets in problem areas identified by the small MS4 operator (for example, areas with recurrent illegal dumping) each year.
- Inspect and clean at least 20% of the small MS4 owned and operated surface drainage system in problem areas identified by the small MS4 operator (for example, areas with recurrent illegal dumping) each year.
- Collect and dispose of or recycle used oil and other household hazardous waste (HHW) from the public in at least three events each year. An event is any day in which the public has an opportunity to dispose of or recycle HHW either through collection or drop off

Evaluation:

- By year two, complete O&M program for inspecting and cleaning City-owned and maintained curb inlets and surface drains.
- In years three through five, implement a program including inspection and cleaning of at least 20% of all target drains.

10.11 BMP 6.11:

Storm Sewer System Operation and Maintenance Problem Areas.

Measurable Goals:

Develop a list of 100% of the identified potential problem areas. Identify and prioritize problem areas for increased inspection (for example, areas with recurrent illegal dumping). Review and update the list of potential problem areas at least one time annually to address changes or additions to the list.

Evaluation:

- The city shall identify and document a list of potential pollutant discharge problem areas.
- The city shall review the list annually and update as necessary.

10.12 BMP 6.12:

Operation and Maintenance Program to Reduce Discharges of Pollutants from Roads.

Measurable Goals:

Implement the following:

- A street sweeping and cleaning program to address 75% of the MS4 area where street sweeping is technically feasible annually.
 - Ensure 100% of the MS4 area where street sweeping is technically feasible is addressed at least two times by the end of the permit term.
- One or a combination of the following non-street sweeping controls:
 - an inlet protection program addressing 100% of the small MS4 area where street sweeping is technically infeasible by the end of the permit term, which must include an implementation schedule and a waste disposal procedure, or

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- Ensure that trash receptacles, or similar trash capturing devices are provided and maintained in 100% of the areas identified as high trash generating areas within the areas where street sweeping is technically infeasible (such as areas near parks, event spaces, etc.).

Evaluation:

The city shall maintain mileage logs showing odometer readings, subdivisions and/or street segments, and dates of street sweeping and cleaning on an annual basis.

The city shall document trash service at city parks and event spaces on an annual basis.

10.13 BMP 6.13:

Mapping of Facilities.

Measurable Goals:

On a map of the area regulated under this general permit, identify where 100% of the city-owned and operated facilities and stormwater controls are located. Review and update the map at least one time annually to address changes or additions to the facilities and controls.

Evaluation:

Maintain a log of the city-owned and operated facilities and stormwater controls on the city's GIS system, reviewing the information on an annual basis.

10.14 BMP 6.14:

Assessment of Facilities' Pollutant Discharge Potential.

Measurable Goals:

Review 100% of the facilities identified at least one time per permit term for their potential to discharge pollutants into stormwater.

Evaluation:

The city prepared a Municipal Facility and Stormwater Control Inventory in 2021. The city shall review the inventory annually, and update the inventory, as needed, to address changes or additions to the facilities and controls.

Before the end of year four, the city shall review the facilities potential to discharge pollutants into stormwater, and update the inventory as necessary.

10.15 BMP 6.15:

Identification of high priority facilities.

Measurable Goals:

Based on the assessment, the city shall identify as high priority those facilities that have a high potential to generate stormwater pollutants. A list of 100% of the identified facilities must be developed and maintained each year. Review and update the list of high priority facilities at least one time annually to address changes or additions to the facilities.

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Evaluation:

The city prepared a Municipal Facility and Stormwater Control Inventory in 2021. The city shall review the inventory annually, and update the inventory, as needed, to address changes or additions to the facilities and controls.

Before the end of year three, the city shall review the facilities and identify those as high priority to generate stormwater pollutants and update the inventory as necessary.

10.16 BMP 6.16:

Documentation of Assessment Results.

Measurable Goals:

Document the results of all the assessments and maintain copies of 100% of the site evaluation checklists used to conduct the assessments each year. The documentation must include:

- The city shall document the results of the city's initial assessment, and any identified deficiencies and corrective actions taken

Evaluation:

The Municipal Facility and Stormwater Control Inventory completed in 2021 included initial assessments of all city-owned facilities as well as inspection checklists for each type of facility. Inspections of facilities are carried out annually and deficiencies identified. Inspection results and corrective actions scheduled and taken are documented and included in annual reports when required.

10.17 BMP 6.17:

Development of Facility-Specific SOPs.

Measurable Goals:

Develop facility-specific stormwater management SOPs for 100% of the MS4 owned and operated facilities. A description of 100% of the BMPs developed must be included in each facility-specific SOP. Review and update the facility-specific SOPs at least one time annually to address changes or additions to the facilities. If requested, SOPs must be made available to TCEQ within 24 hours of the request for review.

Evaluation:

The city shall prepare a SOP for all city-owned facilities and review and update the facility-specific SOP on an annual basis. In each of years one through 4, the City will develop SOPs for 25% of all city-owned facilities. In each year subsequent to development of an SOP, it will be reviewed and updated as needed.

10.18 BMP 6.18:

Stormwater Controls for High Priority Facilities, General Good Housekeeping.

Measurable Goals:

Shelter from exposure to stormwater 100% of material with a potential to contribute to stormwater pollution (such as, fertilizers, solvents, paints, cleaners, automotive products, etc.) each year.

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Evaluation:

Material with potential to contribute to stormwater pollution will be inspected during regular facility inspections to ensure appropriate storage and sheltering.

10.19 BMP 6.19:

Stormwater Controls for High Priority Facilities, Deicing and anti-icing material storage.

Measurable Goals:

Implement one or a combination of the following: Ensure that 100% of stormwater runoff from storage piles of salt and other de-icing and anti-icing materials is not discharged each year. Or ensure that 100% of discharges from the piles are authorized under a separate discharge permit each year.

Evaluation:

Any mishandling of anti-icing materials will be identified during preparation and after-action review of cold weather events and proper storage and handling will be restored. Storage will also be inspected during annual facility inspections.

10.20 BMP 6.20:

Stormwater Controls for High Priority Facilities, Fueling and vehicle maintenance.

Measurable Goals:

Develop and implement SOPs that address spill prevention and spill control at 100% of permittee-owned and operated vehicle fueling, vehicle maintenance, and bulk fuel delivery facilities each year. Review and update the facility specific SOPs at least one time annually to address changes or additions to the facilities.

Evaluation:

At least once during the permit term, the city shall review the facilities and identify those as high priority to generate stormwater pollutants and update the inventory as necessary. During the high priority facility evaluation, the city shall develop a SOP to address fueling and vehicle maintenance spill prevention, reviewing the facility specific SOP on an annual basis.

10.21 BMP 6.21:

Stormwater Controls for High Priority Facilities, Equipment and vehicle washing.

Measurable Goals:

Develop and implement SOPs that address equipment and vehicle washing activities at 100% of the permittee-owned and operated facilities where washing occurs. To ensure that wastewater is not discharged under this general permit, the permittee's SOP must include one or more of the following:

- installing a vehicle wash reclaim system,
- capturing and hauling the wastewater for proper disposal,
- connecting to sanitary sewer (where applicable and approved by local authorities),
- ceasing the washing activity, or

- applying for and obtaining a separate TPDES permit. Review and update the facility specific SOPs at least one time annually to address changes or additions to the facilities.

Evaluation:

During this permit term, all vehicle washing operations at the various facilities will be re-evaluated and one or more appropriate activity modification(s) will be implemented to address the risk of pollution of stormwater. Those modifications will be documented and reported as required.

10.22 BMP 6.22:

Inspections.

Measurable Goals:

Develop and implement an inspection program, which at a minimum must include inspections of 100% of high priority permittee-owned facilities one time per year. The results of 100% of the inspections and observations must be documented and available for review by the TCEQ each year.

Evaluation:

The city implements and will continue a high priority city-owned facilities inspection program, documenting inspections and observations on an annual basis.

11. MINIMUM CONTROL MEASURE NO. 7 – INDUSTRIAL STORMWATER SOURCES

Permittees who operate Level 4 small MS4s shall identify and control pollutants in stormwater discharges to the small MS4 from the permittee's landfills; other treatment, storage, or disposal facilities for municipal waste (for example, transfer stations and incinerators); hazardous waste treatment, storage, disposal and recovery facilities and facilities that are subject to Emergency Planning and Community Right-to-Know Act (EPCRA) Title III, Section 313; and any other industrial or commercial discharge the permittee determines are contributing a substantial pollutant loading to the small MS4. This requirement is only applicable to Level 4 MS4s, and does not apply to the City of Schertz, a Level 3 MS4.

12. MINIMUM CONTROL MEASURE NO. 8 – AUTHORIZATION FOR CONSTRUCTION ACTIVITIES WHERE THE MS4 IS THE SITE OPERATOR

The development of this MCM for construction activities, where the small MS4 is the construction site operator, is optional and provides an alternative to the MS4 operator seeking coverage under TPDES CGP, TXR150000, for each construction activity. Permittees that choose to develop and implement this MCM will be authorized to discharge stormwater and certain non-stormwater from construction activities only where the MS4 operator meets the definition of a construction site operator. This MCM only authorizes the small MS4 operator and does not provide authorization for other construction site operators at a municipal project. This MCM is optional, and the City of Schertz will not be seeking approval for this MCM in this permit.

Appendix 13.1: Implementation Schedule



CITY OF SCHERTZ MS4 BMP IMPLEMENTATION SCHEDULE

Permit Years 2024 - 2029

[illegible]

target month for activity or annual review

ongoing activity

BMP not used

Appendix 13.2: Map of MS4 Area



