

Stormwater Management Program

for

**Willow Fork Drainage District and Cinco Municipal Utility
Districts No. 1, 2, 3, 5, 6, 7, 8, 9, 10, 12, and 14**

September 2023

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Acronyms/Definitions

BMP	Best Management Practice
CGP	Construction General Permit
Districts	Cinco Municipal Utility District No. 1, Cinco Municipal Utility District No.2, Cinco Municipal Utility District No. 3, Cinco Municipal Utility District No. 5, Cinco Municipal Utility District No. 6, Cinco Municipal Utility District No. 7, Cinco Municipal Utility District No. 8, Cinco Municipal Utility District No. 9, Cinco Municipal Utility District No. 10, Cinco Municipal Utility District No. 12, and Cinco Municipal Utility District No. 14
EPA	Environmental Protection Agency
Executive Director	Executive Director for the Texas Commission on Environmental Quality
General Permit	TPDES General Permit No. TXR040000
HHW	Household Hazardous Waste
MCM	Minimum Control Measure
MEP	Maximum Extent Practicable
MS4	Municipal Separate Storm Sewer System
MUD	Municipal Utility District
No.	Number
NOI	Notice of Intent
PSA	Public Service Announcement
SWMP	Stormwater Management Program
SWPPP	Stormwater Pollution Prevention Plan
TCEQ	Texas Commission on Environmental Quality
TPDES	Texas Pollutant Discharge Elimination System
U.S.	United States
WFDD	Willow Fork Drainage District

Preface

Regulatory Background

Willow Fork Drainage District (WFDD) and the Districts are small Municipal Separate Storm Sewer System (MS4) operators that are located within an urbanized area as determined by the 2010 Decennial Census by the U.S. Census Bureau and are therefore eligible for coverage under Texas Pollutant Discharge Elimination System (TPDES) General Permit No. TXR040000 (General Permit). WFDD and the Districts are non-traditional small MS4s (drainage districts) and therefore are level 2 MS4s.

To the extent allowable under state and local law, small MS4 operators must develop and implement a Stormwater Management Program (SWMP) and submit a Notice of Intent (NOI) according to the requirements of Part III of TPDES General Permit No. TXR040000 for stormwater discharges that reach Waters of the United States. Multiple MS4s with several operators must each develop and submit separate Notices of Intent (NOI) and a SWMP which may be jointly developed to meet the SWMP requirements in Part II.D.3 or Part III. Each MS4 operator will be issued a distinct permit number. The SWMP must clearly list the name and permit number (or copy of NOI, if permit number not yet issued) for each MS4 operator that contributes to the development and implementation of the SWMP and provide confirmation that the contributing MS4 operator has agreed to contribute.

The SWMP must be developed to prevent pollution in stormwater to the maximum extent practicable (MEP) and effectively prohibit illicit discharges to the system. Existing programs or best management practices (BMPs) may be used to fulfill the requirements of the General Permit. The SWMP must include a timeline that demonstrates a schedule for implementation of the program throughout the permit term. If changes to the program are needed, revisions are to be summarized in the Annual Report.

The MS4 operator must submit a concise annual report to the executive director within 90 days of the end of each permit year (by April 24th). The annual report must address the previous permit year. The first permit year for annual reporting purposes shall begin on the date of permit issuance, and shall last for one year. Subsequent calendar years will begin on the anniversary date of the permit issuance and last for one year. The annual report permitting year is January 24th to January 23rd. The MS4 operator must also make a copy of the annual report readily available for review by Texas Commission on Environmental Quality (TCEQ) personnel upon request.

Year 1 of the permit shall run from December 13, 2019 through January 23, 2020. Year 2 of the permit shall run from January 24, 2020 through January 23, 2021. Year 3 of the permit shall run from January 24, 2021 through January 23, 2022. Year 4 of the permit shall run from January 24, 2022 through January 23, 2023. Year 5 of the permit shall run from January 24, 2023 through January 23, 2024. Should the TCEQ administratively continue the permit after January 23, 2024, each successive year of the permit shall commence on January 24th and end on January 23rd.

Setting

Willow Fork Drainage District and the Districts cover an area of approximately 8.9 square miles, of which 8.2 square miles is within Fort Bend County, Texas, and 0.7 square miles is within Harris County, Texas. Harris County has the responsibility for maintaining the roads and associated drainage system within its boundaries.

According to the 2010 Decennial Census, 4.92 square miles of WFDD within Fort Bend County was determined to be urbanized. This SWMP will pertain to this area of WFDD. This urbanized portion of WFDD is approximately 95 percent developed. *Exhibit 1* depicts the boundary and general service area of Willow Fork Drainage District and the Districts.

WFDD is located in southeast Texas. Terrain varies from level to gently rolling. The growing season is 296 days. Average annual rainfall is 45.3 inches. Temperatures range from a mean minimum of 41°F to a mean maximum of 93°F. Soils vary from rich alluvial soils to sandy loam and clay.

Surface water consists of rivers, bayous, creeks, and small lakes. Flow from bayous is generally sluggish due to the gently sloping topography. There are few springs that contribute significantly to base flow.

Organization and Legal Authority

WFDD was created by an Order of the Texas Water Commission (now the Texas Commission on Environmental Quality) dated February 20, 1985. Managed by a Board of Directors, WFDD's rights, powers, privileges, and authority are established by the general laws of the State of Texas pertaining to water control and improvement districts. WFDD was created to finance the acquisition and/or construction of major outfall drainage facilities, trunk storm sewer facilities, and related projects. WFDD is responsible for maintaining the storm sewer system from the extreme event point of entry and stormwater conveyance ditches.

The urbanized portion of WFDD located in Fort Bend County is primarily composed of master planned communities located within Municipal Utility Districts (MUDs) created and operating under the authority of the Texas Water Code. The MUDs consist of Cinco Municipal Utility District No. 1, Cinco Municipal Utility District No. 2, Cinco Municipal Utility District No. 3, Cinco Municipal Utility District No. 5, Cinco Municipal Utility District No. 6, Cinco Municipal Utility District No. 7, Cinco Municipal Utility District No. 8, Cinco Municipal Utility District No. 9, Cinco Municipal Utility District No. 10, Cinco Municipal Utility District No. 12, and Cinco Municipal Utility District No. 14 (Districts). These Municipal Utility Districts are responsible for water, storm sewer (up to the extreme event point of entry), sanitary sewer, and waste management services within their boundaries.

Other than their Boards of Directors, WFDD and the Districts employ no full time staff. Both WFDD and the Districts contract for services including engineering services, daily operation and maintenance activities, inspection services, and wastewater treatment plant operations.

Orders and Guidance

Key Willow Fork Drainage District and District orders and guidelines that may be affected by this SWMP include:

- Contracts held between Willow Fork Drainage District and its contractors
- Contracts held between the Districts and their contractors
- Willow Fork Drainage District Rate Orders and Rules and Regulations
- District Rate Orders and Rules and Regulations

Regulations/Rate Orders Adopted	District	MCM
Rules and Regulations adopted July 8, 2010	Willow Fork Drainage District	<p>MCM No. 2 - Illicit Discharge Detection and Elimination</p> <p>MCM No. 3 - Construction Site Stormwater Control</p> <p>MCM No. 4 - Post-Construction Stormwater Management in New Development and Redevelopment</p>

Regulations/Rate Orders Adopted	District	MCM
Amended Rate Order adopted June 3, 2014	Cinco Municipal Utility District No. 1	MCM No. 2 - Illicit Discharge Detection and Elimination MCM No. 3 - Construction Site Stormwater Control MCM No. 4 - Post-Construction Stormwater Management in New Development and Redevelopment
Resolution for Adoption of Order Establishing Policy and Rates for Water and Sewer Service adopted July 11, 2017	Cinco Municipal Utility District No. 2	MCM No. 2 - Illicit Discharge Detection and Elimination MCM No. 3 - Construction Site Stormwater Control MCM No. 4 - Post-Construction Stormwater Management in New Development and Redevelopment
Amended Rate Order adopted August 21, 2014	Cinco Municipal Utility District No. 3	MCM No. 2 - Illicit Discharge Detection and Elimination MCM No. 3 - Construction Site Stormwater Control MCM No. 4 - Post-Construction Stormwater Management in New Development and Redevelopment
Resolution for Adoption of Order Establishing Rules, Policy and Rates for Water and Sewer Service adopted January 10, 2017	Cinco Municipal Utility District No. 5	MCM No. 2 - Illicit Discharge Detection and Elimination
Amended Rate Order adopted April 18, 2019	Cinco Municipal Utility District No. 6	MCM No. 2 - Illicit Discharge Detection and Elimination MCM No. 3 - Construction Site Stormwater Control MCM No. 4 - Post-Construction Stormwater Management in New Development and Redevelopment
Amended Rate Order adopted December 8, 2017 (effective as of January 8, 2018)	Cinco Municipal Utility District No. 7	MCM No. 2 - Illicit Discharge Detection and Elimination MCM No. 3 - Construction Site Stormwater Control MCM No. 4 - Post-Construction Stormwater Management in New Development and Redevelopment
Amended Rate Order adopted May 28, 2019	Cinco Municipal Utility District No. 8	MCM No. 2 - Illicit Discharge Detection and Elimination MCM No. 3 - Construction Site Stormwater Control MCM No. 4 - Post-Construction Stormwater Management in New Development and Redevelopment

Regulations/Rate Orders Adopted	District	MCM
Amended Rate Order adopted April 17, 2019	Cinco Municipal Utility District No. 9	MCM No. 2 - Illicit Discharge Detection and Elimination MCM No. 3 - Construction Site Stormwater Control MCM No. 4 - Post-Construction Stormwater Management in New Development and Redevelopment
Amended Rate Order adopted May 8, 2014	Cinco Municipal Utility District No. 10	MCM No. 2 - Illicit Discharge Detection and Elimination MCM No. 3 - Construction Site Stormwater Control MCM No. 4 - Post-Construction Stormwater Management in New Development and Redevelopment
Amended Rate Order adopted November 12, 2018	Cinco Municipal Utility District No. 12	MCM No. 2 - Illicit Discharge Detection and Elimination MCM No. 3 - Construction Site Stormwater Control MCM No. 4 - Post-Construction Stormwater Management in New Development and Redevelopment
Amended Rate Order adopted May 23, 2018	Cinco Municipal Utility District No. 14	MCM No. 2 - Illicit Discharge Detection and Elimination MCM No. 3 - Construction Site Stormwater Control MCM No. 4 - Post-Construction Stormwater Management in New Development and Redevelopment

Construction and Development

WFDD and the Districts are responsible for plan review aspects within their jurisdiction. Construction projects are subject to the requirements of the TPDES Construction General Permit.

Inspection/Enforcement

WFDD and the Districts' maintenance contractors report regulatory infractions as they are discovered during regular maintenance operations. Per WFDD and the Districts' Rate Orders, any person, corporation or other entity who:

- Makes unauthorized use of WFDD or District facilities
- Causes damage to WFDD or District facilities by using such facilities in a manner or for a purpose contrary to the purpose for which such facilities were designed
- Disposes unauthorized material into the WFDD or District storm sewer system

shall be subject to a penalty for each breach of the foregoing provisions. Each day that a breach of any provision hereof continues shall be considered a separate violation. Additionally, the

violator is responsible for removing any unauthorized materials and restoring the drainage facilities to their prior condition or reimbursing the WFDD or Districts for all costs associated with removal and restoration. These penalties shall be in addition to any other penalties, fees and charges that may be assessed by the laws of the State of Texas and any other legal rights and remedies of the WFDD or Districts as may be allowed by law. In addition to the civil penalties described above, the violation of a regulation adopted by WFDD or Districts may also result in a Class C misdemeanor.

In the WFDD and the Districts, builders are required to install erosion control devices. The accumulation of any trash, sediment, dirt or any other debris or the washing of trash, sediment, dirt, and all other debris into a drainage system is considered a violation of the WFDD's and Districts' Rate Orders and Rules and Regulations. Builders are responsible for conducting regular inspections of their erosion control measures to ensure they are functioning properly.

SWMP Rationale

This SWMP is designed to address stormwater quality management issues typical of a developed residential community. Concerns specific to local watersheds were considered and specific BMPs were selected to effectively coordinate with existing activities and programs in the area.

SWMP Coverage

This SWMP addresses the requirements of TPDES General Permit No. TXR040000. A copy of the General Permit is included in *Appendix A*. Multiple MS4s with several operators have participated in the development of this SWMP and are submitting separate NOIs and this jointly developed SWMP to meet the SWMP requirements in Part II.D.3 or Part III. for the following Districts: Willow Fork Drainage District, Cinco Municipal Utility District No. 1, Cinco Municipal Utility District No. 2, Cinco Municipal Utility District No. 3, Cinco Municipal Utility District No. 5, Cinco Municipal Utility District No. 6, Cinco Municipal Utility District No. 7, Cinco Municipal Utility District No. 8, Cinco Municipal Utility District No. 9, and Cinco Municipal Utility District No. 10, Cinco Municipal Utility District No. 12, and Cinco Municipal Utility District No.14. The requirements of this SWMP are only applicable to those portions of the applicants' MS4s that are located within urbanized areas. The SWMP includes copies of NOIs for these Districts in *Appendix B*. A map depicting the area covered by this SWMP is included in *Appendix C*.

WFDD is the overall administrator for this SWMP. Each SWMP participant is responsible for compliance with the TPDES MS4 permit and this SWMP for the facilities it operates. Each MS4 operator will be issued a distinct permit number.

SWMP Implementation Schedules

The implementation schedules described in this SWMP are proposed, based on available information. Where measurable goals are accomplished ahead of schedule, it will be reported in the Annual Report. In the event implementation schedule adjustments are needed, revisions to the SWMP will be made in accordance with the General Permit. The five-year Implementation Schedule timeline summary is provided in *Appendix D*.

Additional Permit Requirements

The coalition of participating Cinco MUDs discharges into the Willow Fork Channel. Willow Fork Channel is in designated Segment 1014B and 1014A of Buffalo Bayou and Buffalo Bayou Above Tidal respectively. The Willow Fork Drainage District maintains the channel for flood control purposes. These stream segments are impaired for bacteria and have an EPA approved TMDL. The MS4s discharge indirectly to a waterbody with a TMDL, so they are subject to further requirements which include targeted BMPs for bacteria, benchmarks, and measureable goals. WFDD and the coalition of participating MUDs

are part of the *Implementation Plan for Seventy-Two Maximum Daily Loads for Bacteria in the Houston-Galveston Region (I-Plan)*.

The benchmark value for bacteria is the Waste Load Allocation: 837.68 Billion MPN/day (WLA_{Stormwater}).

The BMPs in the I-Plan address the following:

1. Sanitary Sewer Systems

- (i) Make improvements to sanitary sewers to reduce overflows;

(Implementation Activity 2.1: Develop Utility Asset Management Programs for Sanitary Sewer Systems, Page 58 of I-Plan)

- (ii) Address lift station inadequacies;

(Implementation Activity 2.3: Encourage Appropriate Mechanisms to Maintain Function at Lift Stations, Page 61 of I-Plan)

- (iii) Improve reporting of overflows

(Implementation Activity 2.4: Improve Reporting Requirements for Sanitary Sewer Overflows, Page 61 of I-Plan)

and

- (iv) Strengthen sanitary sewer use requirements to reduce blockage from fats, oils and grease.

(Implementation Activity 2.2: Address Fats, Oils, and Grease, Page 60 of I-Plan)

Additional Activities in I-Plan:

- Implementation Activity 2.5: Strengthen Controls on Subscriber Systems (Page 62);
- Implementation Activity 2.6: Penalties for Violations (Page 63)

2. On-site Sewage Facilities (for entities with appropriate jurisdiction)

- (i) Identify and address failing systems;

(Implementation Activity 3.1: Identify and Address Failing Systems, Page 66 of I-Plan) and

- (ii) Address inadequate maintenance of On-Site Sewage Facilities (OSSFs)

(Implementation Activity 3.2: Address Inadequate Maintenance of OSSFs, Page 67 of I-Plan)

Additional Activities in I-Plan:

- Implementation Activity 3.3: Legislation and Other Regulatory Actions (Page 68).

3. Illicit Discharges and Dumping

Place additional effort to reduce waste sources of bacteria; for example, from septic systems, grease traps, and grit traps.

(Implementation Activity 6.1: Detect and Eliminate Illicit Discharges, Page 79 of I-Plan)

(Implementation Activity 6.2: Improve Regulation and Enforcement of Illicit Discharges, Page 80 of I-Plan)

(Implementation Activity 6.3: Monitor and Control Waste Hauler Activities, Page 81 of I-Plan)

4. Animal Sources

Expand existing management programs to identify and target animal sources such as zoos, pet waste, and horse stables.

(Implementation Activity 7.1: Promote Increased Participation in Existing Programs for Erosion Control, Nutrient Reduction, and Livestock Management, Page 85 of I-Plan)

(Implementation Activity 7.2: Promote the Management of Feral Hog Populations, Page 87 of I-Plan)

5. Residential Education

Increase focus to educate residents on:

- (i) Bacteria discharging from a residential site either during runoff events or directly;
- (ii) Fats, oils, and grease clogging sanitary sewer lines and resulting overflows;
- (iii) Decorative ponds; and
- (iv) Pet waste

(Implementation Activity 8.1: Expand Homeowner Education Efforts Throughout the BIG Project Area, Page 89 of I-Plan).

Targeted controls, measurable goals, and identification of benchmarks are more specifically addressed in the I-Plan for the region and are addressed for the MS4s (if applicable) in the following sections of the SWMP.

1. Sanitary Sewer Systems (*Section 5.3.9*)
2. On-site Sewage Facilities (for entities with appropriate jurisdiction) (*Section 5.3.10*)
3. Illicit Discharges and Dumping (*Section 2.3.3*)
4. Animal Sources (*Section 5.3.11*)
5. Residential Education (*Section 1.3.2*)

Section 1 – Public Education, Outreach, and Involvement Minimum Control Measure

1.1 Permit Requirement (Part III.B.1 and Part II.E.16)

Part III.B.1

“(a) Public Education and Outreach

- (1) All permittees shall develop, implement, and maintain a comprehensive stormwater education and outreach program to educate public employees, businesses, and the general public of hazards associated with the illegal discharges and improper disposal of waste and about the impact that stormwater discharges can have on local waterways, as well as the steps that the public can take to reduce pollutants in stormwater. Existing permittees shall assess program elements that were described in the previous permit, modify as necessary, and develop and implement new elements, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP. New elements must be fully implemented by the end of this permit term and newly regulated permittees shall have the program fully implemented by the end of this permit term. The program must, at a minimum:

Existing permittees shall assess program elements that were described in the previous permit, modify as necessary, and develop and implement new elements, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP. New elements must be fully implemented by the end of this permit term and newly regulated permittees shall have the program fully implemented by the end of this permit term. The program must, at a minimum:

- a. Define the goals and objectives of the program based on high priority community-wide issues (for example, reduction of nitrogen in discharges from the small MS4, promoting previous techniques used in the small MS4, or improving the quality of discharges to the Edwards Aquifer);
 - b. Identify the target audience(s);
 - c. Develop or utilize appropriate educational materials, such as printed materials, billboard and mass transit advertisements, signage at select locations, radio advertisements, television advertisements, and websites;
 - d. Determine cost effective and practical methods and procedures for distribution of materials.
- (2) Throughout the permit term, all permittees shall make the educational materials available to convey the program’s message to the target audience(s) at least annually.
 - (3) If the permittee has a public website, the permittee shall post its SWMP and the annual reports required under Part IV.B.2. or a summary of the annual report on the permittee’s website. The SWMP must be posted no later than 30 days after the approval date, and the annual report no later than 30 days after the due date.
 - (4) All permittees shall annually review and update as necessary, the SWMP and MCM implementation procedures required by Part III.A.2., as necessary. Any changes must be

reflected in the annual report. Such written procedures must be maintained, either on site or in the SWMP and made available for inspection by the TCEQ.

- (5) MS4 operators may partner with other MS4 operators to maximize the program and cost effectiveness of the required outreach.”

“(b) Public Involvement

All permittees 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, except that correctional facilities are not required to implement this portion of the MCM.

Existing permittees shall assess program elements that were described in the previous permit, modify as necessary, and develop and implement new elements, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP. New elements must be fully implemented by the end of this permit term and newly regulated permittees shall have the program fully implemented by the end of this permit term. At a minimum, all permittees shall:

- (1) If feasible, consider using public input (for example, the opportunity for public comment, or public meetings) in the implementation of the program;
- (2) If feasible, create opportunities for citizens to participate in the implementation of control measures, such as stream clean-ups, storm drain stenciling, volunteer monitoring, volunteer “Adopt-A-Highway” programs, and educational activities;
- (3) Ensure the public can easily find information about the SWMP.”

Part II.E.16 – Public Notice Process for NOI Submittal

“An applicant under this general permit shall adhere to the following procedures:

- (a) The applicant shall submit an NOI and SWMP to the executive director. The SWMP must include information about:
 - (1) BMPs the applicant will implement for each of the six MCMs and program elements pursuant to Part II.D (relating to Impaired Water Bodies and Total Maximum Daily Load (TMDL) Requirements), as appropriate;
 - (2) The measurable goals for each of the BMPs and program elements pursuant to Part II.D.4 (relating to Impaired Water Bodies and Total Maximum Daily Load (TMDL) Requirements), including, as appropriate the months and years in which the applicant will take the required actions, including interim milestones and the frequency of the action; and
 - (3) The person or persons responsible for implementing or coordinating the applicants SWMP.
- (b) After the applicant receives written instructions from the TCEQ’s Office of Chief Clerk, the applicant must publish notice of the executive director’s preliminary decision on the NOI and SWMP.
- (c) The notice will include the following information, at a minimum:
 - (1) The legal name of the MS4 operator;
 - (2) Indication of whether the NOI is for a new authorization or is a renewal of an existing authorization;
 - (3) The address of the applicant;

- (4) A brief summary of the information included in the NOI, such as the general location of the small MS4 and a description of the classified receiving waters that receive the discharges from the small MS4;
 - (5) The location and mailing address where the public may provide comments to the TCEQ;
 - (6) The public location where copies of the NOI and SWMP, as well as the executive director's general permit and fact sheet, may be reviewed; and
 - (7) If required by the executive director, the date, time, and location of the public meeting.
- (d) This notice must be published at least once in a newspaper of general circulation in the municipality or county where the small MS4 is located. If the small MS4 is located in multiple municipalities or counties, the notice must be published at least once in a newspaper of general circulation in the municipality or county containing the largest resident population for the regulated portion of the small MS4. This notice must provide opportunity for the public to submit comments on the NOI and SWMP. In addition, the notice must allow the public to request a public meeting. A public meeting (equivalent to a "public hearing" as required by 40 CFR §122.28(d)(2)(ii)) will be held if the TCEQ determines that there is significant public interest.
- (e) The public comment period begins on the first date the notice is published and lasts for at least 30 days. If a public meeting is held, the comment period will end at the closing of the public meeting (see paragraph (f) below). The public may submit written comments to the TCEQ Office of Chief Clerk during the comment period detailing how the NOI or SWMP for the small MS4 fails to meet the technical requirements or conditions of this general permit.
- (f) If significant public interest exists, the executive director will direct the applicant to publish a notice of the public meeting and to hold the public meeting. The applicant shall publish notice of a public meeting at least 30 days before the meeting and hold the public meeting in a county where the small MS4 is located. TCEQ staff will facilitate the meeting.
- (g) If a public meeting is held, the applicant shall describe the contents of the NOI and SWMP. The applicant shall also provide maps and other data on the small MS4. The applicant shall provide a sign in sheet for attendees to register their names and addresses and furnish the sheet to the executive director. A public meeting held under this general permit is not an evidentiary proceeding.
- (h) The applicant shall file with the Chief Clerk a copy and an affidavit of the publication of notice(s) within 60 days of receiving the written instructions from the Chief Clerk.
- (i) The executive director, after considering public comment, will either approve, approve with conditions, or deny the NOI based on whether the NOI and SWMP meet the requirements of this general permit.
- (j) Persons whose names and addresses appear legibly on the sign-in sheet from the public meeting and persons who submitted written comments to the TCEQ will be notified by the TCEQ's Office of Chief Clerk of the executive director's decision regarding the authorization."

1.2 Existing Activities

1.2.1 Outreach

WFDD currently operates a website (www.willowforkdrainagedistrict.com). Managed by a consultant, the website is used to post public notices, WFDD news, and provides information regarding regulations, services, and other information about the Willow Fork Drainage District. Additionally, meeting notices are posted at the Cinco Ranch Homeowners Association Office.

1.2.2 Public Employee Training

WFDD and the Districts retain no staff and are managed by publicly elected Boards of Directors. All required operation and maintenance activities are performed by contractors. The contractors are responsible for the training of their employees.

1.3 Program Implementation

1.3.1 Stormwater Public Education Print Materials

WFDD and the Districts will evaluate stormwater public education print materials on topics such as lawn and garden management, proper handling of household hazardous waste, littering, and commercial stormwater impacts and waste management. Methods of distribution will be evaluated. WFDD and the Districts may collaborate efforts on promoting stormwater public education. WFDD and the Districts will increase public education efforts on bacteria discharging from a residential site either during runoff events or directly; fats, oils, and grease clogging sanitary sewer lines and resulting overflows; decorative pond; and pet waste.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
Public education materials options and distribution methods	Evaluate 100% of the options and identify the best option in Year 1	January 23, 2020 (end of Year 1)
Public education print materials	Provide and distribute once annually in 100% of the water utility bills to all district residents	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)
Public education message	Provide message on water utility bills once annually in 100% of the water utility bills to all district residents	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)
Public education material relating to discharges of bacteria	Provide and distribute at least once annually in 100% of the water utility bills to all district residents	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)

Rationale

Use of print education materials is an effective means to reach a diverse group of people. Evaluation of materials to inform the general public and specific target audiences such as residents, visitors, public service employees, businesses, commercial and industrial facilities, and construction site personnel will be conducted for this BMP. The measurable goals were selected to identify milestones in identifying, printing and distributing public education materials.

1.3.2 Website Stormwater Quality Messages

WFDD currently operates a website (www.willowforkdrainagedistrict.com). WFDD will provide a link on the website to www.CleanWaterClearChoice.org, a local stormwater public education website that addresses issues affecting stormwater quality such as littering, proper household hazardous waste disposal, and proper used oil disposal. The WFDD website can also be used to provide updates on upcoming events and volunteer opportunities. Additionally, if applicable, the Districts may provide a link to the WFDD website for its users.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
Stormwater information on the website	Evaluate current stormwater information on website each year and include at least one stormwater quality message update on website each year	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)

Rationale

WFDD currently operates a website, which can be accessed by local residents and businesses, on which stormwater Public Service Announcements (PSAs) can easily be included. This BMP will be used to inform the public about the impacts polluted stormwater runoff can have on water quality, hazards associated with illegal discharges and improper disposal of waste, and ways they can minimize their impact on stormwater quality.

1.3.3 Contractor Employee Training

WFDD and the Districts will, at minimum, annually provide copies of this SWMP and the General Permit to the Districts and their contractors to facilitate training of contractor employees involved in public service activities. WFDD and the Districts will also require training on the SWMP.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
SWMP and General Permit	Provide copies to Districts and 100% of their contractors	January 23, 2020 (end of Year 1)
Training	Require 100% of contractors for WFDD and the Districts to provide annual training to applicable employees on the SWMP	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)

Rationale

Providing copies of the SWMP and the General Permit to the Districts and their contractors will inform the contractors of the guidelines set forth in these documents. The measurable goals address the implementation of this BMP.

1.3.4 Stormwater Public Education Signage

WFDD and the Districts have stormwater public education signs along their trails and parks. The signs promote education about stormwater pollution prevention in a recreational setting and inform the individuals most likely to change their behaviors (i.e. outdoor and recreation-oriented adults and children).

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
Public education signs	Inspect and maintain signage annually – 100%	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)

Rationale

These signs promote education about stormwater pollution prevention in a recreational setting and can be used to inform the public about the impacts polluted stormwater runoff can have on water quality, hazards associated with illegal discharges and improper disposal of waste, and ways to minimize impacts on stormwater quality.

1.3.5 Storm Drain Decals by Volunteers

Storm drain decals containing the message “Don’t Dump – Drains to Bayou” or a similar message can be applied by volunteer groups. WFDD and the Districts will coordinate with providers of approved decals, provide instructions and advertise the opportunity.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
Storm drain decals	Distribute the decals to 100% of requests by volunteer groups	January 23, 2020 (end of Year 1) and as requested by volunteer groups

Rationale

Storm drain decals heighten public awareness about how most drainage systems are directly connected to receiving waters without any treatment. These decals will help inform the public about the impacts polluted stormwater runoff can have on water quality and the hazards associated with illegal discharges and improper disposal of waste.

1.3.6 Public Notice Requirements

When implementing a public involvement/participation program, WFDD and the Districts will comply with state and local public notice requirements. Following submission of the NOI and SWMP and coordination with the TCEQ's Office of the Chief Clerk, WFDD and the Districts will publish a notice in the local newspaper of general circulation in the county of the availability of the SWMP for public review and comment and allow requests for a public meeting.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
Public notice	Publish notice in local newspaper of availability of SWMP for public review (one publication)	January 23, 2020 (end of Year 1)
Public meeting	Publish notice of public meeting in the local newspaper, if required (one publication)	January 23, 2020 (end of Year 1)
Public meeting	Hold public meeting, if required (one meeting)	January 23, 2020 (end of Year 1)

Rationale

This BMP was selected for compliance with state and local public notice requirements.

1.3.7 Make Presentations on Stormwater Management Program

Implementation of the SWMP will be facilitated by familiarizing WFDD and the Districts' Board members, homeowner associations, and other interested groups on the requirements of the program. WFDD and the Districts will organize presentations to present the information for discussion and input.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline				
Presentations on Stormwater Management Program	Conduct presentations to the WFDD Board members, the Districts' Board members and staff, the regulated community, and the public, as appropriate (one meeting per month)	Monthly Board Meetings as follows (by end of month):				
		January 31, 2020 February 29, 2020 March 31, 2020 April 30, 2020 May 31, 2020 June 30, 2020 July 31, 2020 August 31, 2020 September 30, 2020 October 31, 2020 November 30, 2020 December 31, 2020	January 31, 2021 February 28, 2021 March 31, 2021 April 30, 2021 May 31, 2021 June 30, 2021 July 31, 2021 August 31, 2021 September 30, 2021 October 31, 2021 November 30, 2021 December 31, 2021	January 31, 2022 February 28, 2022 March 31, 2022 April 30, 2022 May 31, 2022 June 30, 2022 July 31, 2022 August 31, 2022 September 30, 2022 October 31, 2022 November 30, 2022 December 31, 2022	January 31, 2023 February 28, 2023 March 31, 2023 April 30, 2023 May 31, 2023 June 30, 2023 July 31, 2023 August 31, 2023 September 30, 2023 October 31, 2023 November 30, 2023 December 31, 2023	January 31, 2024 February 29, 2024 March 31, 2024 April 30, 2024 May 31, 2024 June 30, 2024 July 31, 2024 August 31, 2024 September 30, 2024 October 31, 2024 November 30, 2024 December 31, 2024
Public meeting	If a public meeting is requested, make presentations to interested parties (one meeting)	January 23, 2021 (end of Year 2)				

Rationale

WFDD and the Districts will organize presentations to familiarize WFDD Board members, Districts' Board members and staff, the regulated community, and the public with the requirements of the program. This BMP will provide information on stormwater quality and allow constituents within the MS4 area the opportunity to aid in the implementation of the SWMP.

1.3.8 Public Involvement and Participation

Implementation of the SWMP will be facilitated by familiarizing members of the public with activities of the program. WFDD and the Districts will organize presentations to help get the information out for discussion and input.

The SWMP will be easily available for the public. The SWMP and stormwater educational materials will be included in the website for WFDD. The website for WFDD is <https://www.willowforkdrainagedistrict.com/>.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
SWMP implementation activities and opportunities for public participation	Develop and post information on SWMP implementation activities and opportunities for public participation on the WFDD website during Year 1 – 100%	January 23, 2020 (end of Year 1)
Distribution of SWMP information on website (www.willowforkdrainagedistrict.com), including posting SWMP and annual reports.	Ensure SWMP and annual reports are located on MS4's website – 100%	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)

Rationale

WFDD will post information on the WFDD website to encourage public involvement and participation in the SWMP implementation activities and opportunities. This BMP will provide information on stormwater quality and allow the constituents within the MS4 area the opportunity to aid in the implementation of the SWMP.

Section 2 – Illicit Discharge Detection and Elimination Minimum Control Measure

2.1 Permit Requirement (Part III.B.2)

Part III.B.2

“(a) Program Development

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

Existing permittees must assess program elements that were described in the previous permit, modify as necessary, and develop and implement new elements, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP. New elements must be fully implemented by the end of this permit term and newly regulated permittees shall have the program fully implemented by the end of this permit term. See also Part III.A.1(c).

The Illicit Discharge Detection and Elimination (IDDE) program must include the following:

- a. An up-to-date MS4 map (see Part III.B.2.(c)(1));
 - b. Methods for informing and training MS4 field staff (See Part III.B.2.(c)(2));
 - c. Procedures for tracing the source of an illicit discharge (see Part III. B.2.(c)(5));
 - d. Procedures for removing the source of the illicit discharge (see Part III.B.2.(c)(5));
 - e. For Level 2, 3 and 4 small MS4s, if applicable, procedures to prevent and correct any leaking on-site sewage disposal systems that discharge into the small MS4;..”
- (2) For non-traditional small MS4s, if illicit connections or illicit discharges are observed related to another operator's MS4, the permittee shall notify the other MS4 operator within 48 hours of discovery. If notification to the other MS4 operator is not practicable, then the permittee shall notify the appropriate TCEQ regional office of the possible illicit connection or illicit discharge.
 - (3) If another MS4 operator notifies the permittee of an illegal connection or illicit discharge to the small MS4, then the permittee shall follow the requirements specified in Part III.B.2.(c)(3).
 - (4) All permittees shall annually review and update as necessary, the SWMP and MCM implementation procedures required by Part III.A.2. Any changes must be reflected in the annual report. Such written procedures must be maintained, either on site or in the SWMP and made available for inspection by the TCEQ.”

“(b) Allowable Non-Stormwater Discharges

Non-stormwater flows listed in Part II.C do not need to be considered by the permittee as an illicit discharge requiring elimination unless the permittee or the TCEQ identifies the flow as a significant source of pollutants to the small MS4.

(c) Requirements for all Permittees

All permittees shall include the requirements described below in Parts III.B.2(c)(1)-(6)

(1) MS4 mapping

All permittees shall maintain an up-to-date MS4 map, which must be located on site and available for review by the TCEQ. The MS4 map must show at a minimum the following information:

- a. The location of all small MS4 outfalls that are operated by the permittee and that discharge into waters of the U.S;
- b. The location and name of all surface waters receiving discharges from the small MS4 outfalls;
- c. Priority areas identified under Part III.B.2.(e)(1), if applicable.

(2) Education and Training

All permittees shall implement a method for informing or training all the permittee's field staff that may come into contact with or otherwise observe an illicit discharge or illicit connection to the small MS4 as part of their normal job responsibilities. Training program materials and attendance lists must be maintained on site and made available for review by the TCEQ.

(3) Public Reporting of Illicit Discharges and Spills

All permittees shall publicize and facilitate public reporting of illicit discharges or water quality impacts associated with discharges into or from the small MS4. The permittee shall provide a central contact point to receive reports; for example by including a phone number for complaints and spill reporting.

(4) All permittees shall develop and maintain on site procedures for responding to illicit discharges and spills.

(5) Source Investigation and Elimination

- a. Minimum Investigation Requirements – Upon becoming aware of an illicit discharge, all permittees shall conduct an investigation to identify and locate the source of such illicit discharge as soon as practicable.
 - (i) All permittees shall prioritize the investigation of discharges based on their relative risk of pollution. For example, sanitary sewage may be considered a high priority discharge.
 - (ii) All permittees shall report to the TCEQ immediately upon becoming aware of the occurrence of any illicit flows believed to be an immediate threat to human health or the environment.
 - (iii) All permittees shall track all investigations and document, at a minimum, the date(s) the illicit discharge was observed; the results of the investigation; any follow-up of the investigation; and the date the investigation was closed.
- b. Identification and Investigation of the Source of the Illicit Discharge – All permittees shall investigate and document the source of illicit discharges where the permittees have jurisdiction to complete such an investigation. If the source of illicit discharge extends outside the permittee's boundary, all permittees shall notify the adjacent permitted MS4 operator or TCEQ Regional Office according to Part III.A.3.b.
- c. Corrective Action to Eliminate Illicit Discharge

If and when the source of the illicit discharge has been determined, all permittees shall immediately notify the responsible party of the problem, and shall require the responsible party to perform all necessary corrective actions to eliminate the illicit discharge.

- (6) Inspections** - The permittee shall conduct inspections, in response to complaints, and shall conduct follow-up inspections to ensure that corrective measures have been implemented by the responsible party.

The permittee shall develop written procedures describing the basis for conducting inspections in response to complaints and conducting follow-up inspections.”

2.2 Existing Activities

2.2.1 Inspections and Enforcement

The WFDD's and Districts' contractors are responsible for conducting regular inspections of their erosion control measures to ensure they are functioning properly. The WFDD's and Districts' contractors investigate drainage and other drainage infrastructure problems when requested by citizens. The WFDD's and Districts' maintenance contractors also reports drainage infrastructure problems as they are discovered.

The WFDD's and Districts' Rules and Regulations prohibit the disposal of any substance other than stormwater, including but not limited to, trash, household or other hazardous materials, construction materials or debris, dirt, sediment, chemicals, other debris, grass, tree and yard clippings, or anything else prohibited under regulations implemented pursuant to the Clean Water Act, the Federal Water Pollution Control Act, or any State equivalent act. Any entity found to be in violation of District rules or policies will be subject to fines or penalties as allowed by federal, state and local statutes and regulations. Additionally, the violator is responsible for removing any unauthorized materials and restoring the drainage facilities to their prior condition or reimbursing the District for all costs associated with removal and restoration. An off-duty sheriff with Fort Bend County enforces County Rules and Regulations and issues fines when necessary.

2.3 Program Implementation

2.3.1 Illicit Discharge Regulations/Order(s)

The Districts will evaluate existing regulations/rate orders to address illicit discharges to the MS4. The rate order(s) will prohibit illicit discharges and connections, all non-stormwater discharges that significantly contribute pollutants to the MS4, and illegal dumping. It will include appropriate enforcement procedures and actions and will establish legal authority to carry out inspection surveillance and monitoring procedures necessary to ensure compliance with the rate order(s). The rate order(s) will also identify a list of occasional incidental non-stormwater discharges, if any, that will not be addressed as illicit discharges. Illicit discharges not covered by the rate order(s) (i.e., discharger is a non-rate payer) will be enforced under the WFDD Rules and Regulations or by referring to the local enforcement authority with jurisdiction or to TCEQ.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
Illicit discharge regulations/orders	Evaluate existing regulation/order(s) in Year 1 that may require modification (complete one evaluation)	January 23, 2020 (end of Year 1)
Illicit discharge regulations/orders	Modify existing regulation/order(s) in Year 2 that may require modification (complete one modification if needed)	January 23, 2021 (end of Year 2)

Rationale

If required, WFDD and the Districts will modify existing regulations/rate orders to effectively prohibit illicit discharges to the MS4. The measurable goals identify the steps in the evaluation of a regulation or rate order(s) or modification of an existing regulation or rate order(s) to achieve this BMP.

2.3.2 Storm Drainage System Map

WFDD and the Districts require copies of commercial and residential development drawings for development projects within its boundaries. In the area covered by the SWMP, these files will be integrated into an overall WFDD and the Districts drainage system map.

WFDD and the Districts have developed a map of the storm drainage system that shows all outfalls and the names and locations of all receiving Waters of the United States. Additional features to be shown include the location of major storm sewer pipes, ditches, and other conveyances owned or operated by WFDD and the Districts within the SWMP coverage area, as well as any additional information needed by WFDD and the Districts to implement this SWMP.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
WFDD storm drainage system map	Continue developing storm drainage system map in Year 1 with additional features (complete at least one update)	January 23, 2020 (end of Year 1)
Additional drainage features	Field verify, identify, locate, and map 100% of additional features annually	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)
Developer-provided information	Complete integration of developer-provided drainage information into the district drainage map as received within 1 year – 100%	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)
Storm Drainage System Map	Finalize Storm Drainage System Map with additional features in Permit Year 5 – 100%	January 23, 2024 (end of Year 5)

Rationale

The measurable goals identify the steps in the development of the map based on developer-provided information and from identification and mapping by WFDD and the Districts.

2.3.3 Illicit Discharge Detection and Elimination Program

The illicit discharge detection and elimination program will include the following:

- Provide contact information for reporting illicit discharges or dumping
- Develop procedures for responding to illicit discharges and spills and procedures for inspections in response to complaints
- Respond to complaints and suspected illicit discharges identified during performance of routine operations.
- Develop program to shadow other field activities to screen for illicit discharges.
- Develop methods for informing and training MS4 field staff.
- Develop procedures for tracing the source of an illicit discharge.
- Develop procedures for removing the source of the illicit discharge.
- Facilitate public reporting of illicit discharges of water quality impacts associated with discharges into or from the small MS4.
- Develop procedures to prevent and correct leaking on-site sewage disposal systems.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
Complaints received	Respond to 100% of complaints	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)
Illicit Discharge Screening Program protocol	Complete 100% review of Illicit Discharge Screening Program protocol in Year 1	January 23, 2020 (end of Year 1)
Inspection program	Complete 100% routine inspection program each year.	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)
Outfall screening	Screen 33% of outfalls per year	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)

Rationale

WFDD and the Districts currently have an illicit discharge detection and elimination program and the program's performance will be documented as it related to this SWMP.

2.3.4 Household Hazardous Waste Collection Event

WFDD and the Districts will promote participation in annual or semi-annual county events to collect household hazardous waste (HHW). Harris and Fort Bend Counties hold collection events, which WFDD and the Districts will help publicize.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
Household hazardous waste collection events	Publicize collection events to residents (at least once annually)	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)

Rationale

WFDD and the Districts will coordinate with Harris County and Fort Bend County to publicize their HHW collection programs. This BMP will help reduce the number of illicit discharges by publicizing proper disposal means for hazardous materials and waste. The measurable goal selected will raise public awareness about the collection events and allow WFDD and the Districts to support these established programs.

Section 3 – Construction Site Stormwater Runoff Control Minimum Control Measure

3.1 Permit Requirement (Part III.B.3)

Part III.B.3

“(a) Requirements and Control Measures

- (1) All permittees shall develop, implement, and enforce a program requiring operators of small and large construction activities, as defined in Part I of this general permit, to select, install, implement, and maintain stormwater control measures that prevent illicit discharges to the MEP. The program must include the development and implementation of an ordinance or other regulatory mechanism, as well as sanctions to ensure compliance to the extent allowable under state, federal, and local law, to require erosion and sediment control.

Existing permittees shall assess program elements that were described in the previous permit, modify as necessary, and develop and implement new elements, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP. New elements must be fully implemented by the end of this permit term and newly regulated permittees shall have the the program fully implemented by the end of this permit term.

If TCEQ waives requirements for stormwater discharges associated with small construction from a specific site(s), the permittee is not required to enforce the program to reduce pollutant discharges from such site(s).

(b) Requirements for all Permittees

All permittees shall include the requirements described below in Parts III.B.3(b)(1)-(7)

- (1) All permittees shall annually review and update as necessary, the SWMP and MCM implementation procedures required by Part III.A.2. Any changes must be included in the annual report. Such written procedures must be maintained on site or in the SWMP and made available for inspection by the TCEQ.
- (2) All permittees shall require that construction site operators implement appropriate erosion and sediment control BMPs. The permittee’s construction program must ensure the following minimum requirements are effectively implemented for all small and large construction activities discharging to its small MS4.
 - a. Erosion and Sediment Controls - Design, install and maintain effective erosion controls and sediment controls to minimize the discharge of pollutants.
 - d. Soil Stabilization - Stabilization of disturbed areas must, at a minimum, be initiated immediately whenever any clearing, grading, excavating or other earth disturbing activities have permanently ceased on any portion of the site, or temporarily ceased on any portion of the site and will not resume for a period exceeding 14 calendar days. Stabilization must be completed as soon as practicable, but no more than 14 calendar days after the initiation of soil stabilization measures. In arid, semiarid, and drought-stricken areas, where initiating

vegetative stabilization measures immediately is infeasible, alternative stabilization measures must be employed.

The permittee shall develop written procedures that describes initiating and completing stabilization measures for construction sites.

- c. BMPs – Design, install, implement, and maintain effective BMPs to minimize the discharge of pollutants to the small MS4. At a minimum, such BMPs must be designed, installed, implemented and maintained to:
 - (i) Minimize the discharge of pollutants from equipment and vehicle washing, wheel wash water, and other wash waters;
 - (ii) Minimize the exposure of building materials, building products, construction wastes, trash, landscape materials, fertilizers, pesticides, herbicides, detergents, sanitary waste and other materials present on the site to precipitation and to stormwater; and
 - (iii) Minimize the discharge of pollutants from spills and leaks.
 - d. As an alternative to (a) through (c) above, all permittees shall ensure that all small and large construction activities discharging to the small MS4 have developed and implemented a stormwater pollution prevention plan (SWP3) in accordance with the TPDES CGP TXR150000. In arid, semiarid, and drought-stricken areas where initiating vegetative stabilization measures immediately is infeasible, alternative stabilization measures must be employed and described in the written procedure required in item (2)b above. As an alternative, vegetative stabilization measures may be implemented as soon as practicable.
- (3) Prohibited Discharges – The following discharges are prohibited:
- a. Wastewater from washout of concrete and wastewater from water well drilling operations, unless managed by an appropriate control;
 - b. Wastewater from washout and cleanout of stucco, paint, from release oils, and other construction materials;
 - c. Fuels, oils, or other pollutants used in vehicle and equipment operation and maintenance;
 - d. Soaps or solvents used in vehicle and equipment washing; and
 - e. Discharges from dewatering activities, including discharges from dewatering of trenches and excavations, unless managed by appropriate BMPs.

(4) Construction Plan Review Procedures

To the extent allowable by state, federal, and local law, all permittees shall maintain and implement site plan review procedures, that describe which plans will be reviewed as well as when an operator may begin construction. For those permittees without legal authority to enforce site plan reviews, this requirement is limited to those sites operated by the permittee and its contractors and located within the permittee's regulated area. The site plan procedures must meet the following minimum requirements:

- a. The site plan review procedures must incorporate consideration of potential water quality impacts.

- b. The permittee may not approve any plans unless the plans contain appropriate site specific construction site control measures that, at a minimum, meet the requirements described in Part III.B.3.(a) or in the TPDES CGP, TXR150000.

The permittee may require and accept a plan, such as a SWP3, that has been developed pursuant to the TPDES CGP, TXR150000.

(5) Construction Site Inspections and Enforcement

To the extent allowable by state, federal, and local law, all permittees shall implement procedures for inspecting large and small construction projects. Permittees without legal authority to inspect construction sites shall at a minimum conduct inspections of sites operated by the permittee or its contractors and that are located in the permittee's regulated area.

- a. The permittee shall conduct inspections based on the evaluation of factors that are a threat to water quality, such as: soil erosion potential; site slope; project size and type; sensitivity of receiving waterbodies; proximity to receiving waterbodies; non-stormwater discharges; and past record of non-compliance by the operators of the construction site.
- b. Inspections must occur during the active construction phase.
 - (i) All permittees shall develop and implement updated written procedures outlining the inspection and enforcement requirements. These procedures must be maintained on site or in the SWMP and be made available to TCEQ.
 - (ii) Inspections of construction sites must, at a minimum:
 1. Determine whether the site has appropriate coverage under the TPDES CGP, TXR150000. If no coverage exists, notify the permittee of the need for permit coverage.
 2. Conduct a site inspection to determine if control measures have been selected, installed, implemented, and maintained according to the small MS4's requirements.
 3. Assess compliance with the permittee's ordinances and other regulations; and
 4. Provide a written or electronic inspection report.
- c. Based on site inspection findings, all permittees shall take all necessary follow-up actions (for example, follow-up-inspections or enforcement) to ensure compliance with permit requirements and the SWMP. These follow-up and enforcement actions must be tracked and maintained for review by the TCEQ.

For non-traditional small MS4s with no enforcement powers, the permittee shall notify the adjacent MS4 operator with enforcement authority or the appropriate TCEQ Regional Office according to Part III.A.3(b).

(6) Information Submitted by the Public

All permittees shall develop, implement, and maintain procedures for receipt and consideration of information submitted by the public.

(7) MS4 Staff Training

All permittees shall ensure that all staff whose primary job duties are related to implementing the construction stormwater program (including permitting, plan review, construction site inspections,

and enforcement) are informed or trained to conduct these activities. The training may be conducted by the permittee or by outside trainers.”

3.2 Existing Activities

3.2.1 Plan Review

WFDD and the Districts employ District Engineers to review site plans. Developers, contractors, and builders are required to submit plans to the WFDD and District Engineers for review and approval.

3.2.2 Inspections

Builders/Contractors are responsible for conducting regular inspections of their erosion control measures to ensure they are functioning properly.

3.2.3 District Construction Projects

For WFDD and the Districts, District Engineers coordinate District construction and planning activities, develops and administers District-funded projects, and observes the construction of public improvements. District construction projects comply with the TPDES Construction General Permit No. TXR150000, as applicable.

3.3 Program Implementation

3.3.1 Site Plan Review Program

In order for construction operators to gain permission to discharge runoff to the WFDD, they must be in compliance with the TPDES Construction General Permit No. TXR150000. For the Districts, operators will be required to submit a copy of their NOI and Stormwater Pollution Prevention Plan (SWPPP) to the District Engineer. WFDD and the Districts will develop procedures for engineering construction site plan reviews that incorporate consideration of potential water quality impacts of construction activities. WFDD and the Districts’ District Engineers will evaluate the current site plan review process to address stormwater quality impacts.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
Review process for stormwater quality, including criteria checklists and submitted SWPPPs	Complete one evaluation of current review process in Permit Year 1 and determine if updates are needed.	January 23, 2020 (end of Year 1)
Construction site plan review program	Continue 100% of plan reviews as they are submitted	Prior to planned construction

Rationale

WFDD and the Districts currently have site plan review processes, which will be evaluated and revised to address potential stormwater quality impacts of construction activities as needed. The measurable goals identify steps in the continued development and implementation of this BMP.

3.3.2 Create Regulatory Mechanism

As appropriate and within the limits of its authority, WFDD and the Districts have developed a regulation or other mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under state and local law.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
Regulatory mechanism to address erosion and sediment controls	Complete one evaluation of regulatory mechanism to address erosion and sediment controls to determine if adequate regulations are in place	January 23, 2020 (end of Year 1)
Implement regulation	100% compliance	Prior to planned construction

Rationale

WFDD and the Districts have created a regulatory mechanism to effectively require contractors to address erosion and sediment controls. The measurable goals identify the steps in the evaluation and implementation of the regulatory mechanism.

3.3.3 Erosion and Sediment Control Implementation

WFDD and the Districts will require construction site operators to implement erosion and sediment control BMPs to minimize the discharge of pollutants.

Measureable Goals

BMP/Activity	Quantifiable Target	Deadline
Soil stabilization measures	Require 100% of soil stabilization measures, and implementation of BMPs to control pollutants from equipment and vehicle washing and other wash waters	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)
Require operators to minimize exposure to stormwater of building materials, building products, construction wastes, trash, landscape materials, fertilizers, pesticides, herbicides, detergents, sanitary waste, and other materials	No complaints or reports (0 total) in Permit Years 1 through 5 and 100% of operators will be required to comply	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)

Measureable Goals, continued

BMP/Activity	Quantifiable Target	Deadline
Minimize the discharge of pollutants from spills and leaks in Permit Years 2 through 5. Program prohibits illicit discharges such as wash out wastewater, fuels, oils, soaps, solvents, and dewatering activities	No complaints or reports (0 total) in Permit Years 1 through 5 and ensure 100% compliance that the construction site has developed a SWPPP in accordance with the TPDES Construction General Permit TXR150000.	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)

Rationale

WFDD and the Districts will require operators to implement these BMPs for controlling the discharge of pollutants. The measurable goals will quantify the performance of the program.

3.3.4 Construction Site Inspection Program

WFDD and the Districts' Engineers will review procedures for a construction site inspection program and enforcement of controls, to the extent allowable under state and local law. Violations of the TPDES Construction General Permit No. TXR150000 will be reported to the applicable District(s) and the TCEQ for enforcement.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
Inspection plan	Complete one re-evaluation of inspection plan	January 23, 2020 (end of Year 1)
MS4 staff training procedures, inspection plan, and procedure checklists	Complete one evaluation of staff training procedures, inspection plan, and procedure checklists	January 23, 2020 (end of Year 1)
Construction site inspections	Inspect 100% of construction sites annually	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)

Rationale

WFDD and the Districts are currently performing other inspection and enforcement programs. This BMP will be coordinated within the existing programs to include construction site inspection and enforcement of control measures. The measurable goals selected will allow time for continued program development and implementation of the inspection program.

3.3.5 Reporting Hotline

WFDD and the Districts have a reporting hotline for reporting offenders of construction activities that are discharging pollutants.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
Reporting hotline	Publicize number on website and on stormwater messages on 100% of utility bills	January 23, 2020 (end of Year 1)
Hotline reports	Respond to 100% of reports annually	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)

3.3.6 Distribution of Brochure with Plan Sets

WFDD and the Districts will provide information on stormwater construction general permit requirements for construction site operators by providing a brochure along with returned plan sets.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
Brochures on good housekeeping, waste controls, stormwater pollution minimization, and the TPDES Construction General Permit No. TXR150000	Brochures have been printed and distributed to 100% of construction site operators with returned plan sets	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)

Rationale

WFDD and the Districts will promote good housekeeping and stormwater pollution minimization education for construction site contractors by providing information on issues such as control of waste, concrete truck washout water, chemicals, litter, sanitary waste, and stormwater construction general permit compliance training. The measurable goals were selected to identify milestones in printing and distributing printed materials to construction site personnel.

Section 4 – Post-Construction Stormwater Management in New Development and Redevelopment Minimum Control Measure

4.1 Permit Requirement (Part III.B.4)

Post-Construction Stormwater Management Program

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

Existing permittees shall assess program elements that were described in the previous permit, modify as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP. New elements must be fully implemented by the end of this permit term and newly regulated permittees shall have the program fully implemented by the end of the permit term.

(2) All permittees 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 permittees 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. Newly regulated permittees shall have the program element fully implemented by the end of the permit term.”

“All permittees shall include the requirements described below in Parts III.B.4.(b)(1)-(3)

(1) All permittees shall review and update as necessary, the SWMP and MCM implementation procedures required by Part III.A.2. Any changes must be included in the annual report. Such written procedures must be maintained either on site or in the SWMP and made available for inspection by TCEQ.

(2) All permittees shall document and maintain records of enforcement actions and make them available for review by the TCEQ.

(3) Long-Term Maintenance of Post-Construction Stormwater Control Measures

All permittees shall, to the extent allowable under state, federal, and local law, ensure the long-term operation and maintenance of structural stormwater control measures installed through one or both of the following approaches:

- a. Maintenance performed by the permittee. See Part III.B.5
- b. Maintenance performed by the owner or operator of a new development or redeveloped site under a maintenance plan. The maintenance plan must be filed in the real property records of the county in which the property is located. The permittee shall require the owner or operator of any new development or redeveloped site to develop and implement a maintenance plan addressing maintenance requirements for any structural control measures installed on site. The permittee shall require operation and maintenance performed is documented and retained on site, such as at the offices of the owner or operator, and made available for review by the small MS4.”

4.2 Existing Activities

4.2.1 Plan Review and Inspection

WFDD and the Districts employ District Engineers to review plans. Developers, builders, and contractors are required to submit plans to the District Engineer in which the project occurs.

4.3 Program Implementation

4.3.1 Revise Rules and Regulations

WFDD and the Districts have Rate Orders and Rules and Regulations that require developers to address stormwater runoff. Developers are required to use good housekeeping practices and BMPs to reduce risk of pollutants, soils, and other prohibited items from entering the MS4 through stormwater runoff. WFDD and the Districts will document and maintain records of enforcement actions.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
WFDD and District Rate Orders and Rules and Regulations that address runoff from new development and redevelopment projects	Complete one review of existing Rate Orders and Regulations and develop draft modifications (if required)	January 23, 2020 (end of Year 1)
Modifications to the WFDD and District Rate Orders and Rules and Regulations	Finalize 100% of modifications (if required)	January 23, 2021 (end of Year 2)
Modifications to the WFDD and District Rate Orders and Rules and Regulations	Implement 100% of modifications for remainder of permit term (if required)	January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)

Rationale

WFDD and the Districts will review the existing Rate Orders and Rules and Regulations to effectively require developers to address stormwater runoff. The measurable goals identify the steps in the revision of the WFDD and Districts’ Rules and Regulations (if required).

4.3.2 Plan Review

Plans submitted to the WFDD’s and Districts’ Engineers for new development and redevelopment projects that disturb one acre or more, including projects less than one acre that are part of a larger common plan of development or sale that will result in the disturbance of one or more acres, must ensure that stormwater quality objectives are addressed at an early stage of the development and also ensure that there are adequate provisions made for long-term operation and maintenance of BMPs. Operation and maintenance will be documented.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
Review process and criteria	Complete one evaluation of current review process and criteria for appropriate measures and potential updates	January 23, 2021 (end of Year 2)
Criteria checklists or existing plan review checklists/procedures to provide stormwater quality and long-term inspection and maintenance of BMPs for post-construction new development and redevelopment	Complete one review of criteria checklists or existing plan review checklists/procedures to provide stormwater quality and long-term inspection and maintenance of BMPs for post-construction new development and redevelopment	January 23, 2021 (end of Year 2)
Updated procedures	Implement 100% of updated procedures in review of all submitted plans (if modifications are required)	January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)

Rationale

WFDD and the Districts currently have site plan review processes, which will be evaluated and revised to address consideration of potential stormwater quality impacts of new development and redevelopment projects, so that plans include provisions for long-term inspection and maintenance of BMPs. The measurable goals identify steps in the development and implementation of this BMP.

4.3.3 Distribution of Stormwater Brochure with Plan Sets

WFDD and the Districts will provide information on stormwater construction general permit requirements regarding post-construction stormwater management in new development and redevelopment for operators by providing a brochure along with returned plan sets.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
Print materials	Print and distribute brochure on good housekeeping, waste controls, stormwater pollution minimization, and TPDES Construction General Permit No. TXR150000 compliance to 100% of returned plan sets during plan review in Permit Years 2 through 5	January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)

Rationale

WFDD and the Districts will promote stormwater pollution minimization education for construction site contractors regarding post-construction stormwater runoff requirements for new development and redevelopment requirements by providing information in the form of print material received with returned plan sets. The measurable goals were selected to identify milestones in printing and distributing printed materials to construction site contractors.

4.3.4 Homeowner/Yard Service Education Materials

WFDD and the Districts will promote proper application of fertilizer and pesticides by providing pertinent materials to homeowners and yard service providers.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
Education materials on proper fertilizer and pesticide application	Complete one review of education materials on proper fertilizer and pesticide application	January 23, 2020 (end of Year 1)
Information on proper fertilizer and pesticide application	Provide one water utility bill message with information on proper fertilizer and pesticide application to 100% of residents (once annually)	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)

Rationale

WFDD and the Districts will promote stormwater pollution minimization education for homeowners and yard service providers by providing information on proper fertilizer and pesticide application. The measurable goals were selected to identify milestones in developing and distributing materials to homeowners and yard service personnel.

Section 5 – Pollution Prevention and Good Housekeeping for Municipal Operations Minimum Control Measure

5.1 Permit Requirement (Part III.B.5.)

Program Development (Part III.B.5.a.)

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

Existing permittees shall assess program elements that were described in the previous permit, modify as necessary, and develop and implement new elements, as necessary, to continue reducing the discharges of pollutants from the MS4 to the MEP. New elements must be fully implemented by the end of this permit term and newly regulated permittees shall have the program fully implemented by the end of this permit term. See also Part III.A.1.(c))”

Requirements for all Permittees (Part III.B.5.b.)

“(1) Permittee-owned Facilities and Control Inventory

All permittees shall develop and maintain an inventory of facilities and stormwater controls that it owns and operates within the regulated area of the small MS4. If feasible, the inventory may include all applicable permit numbers, registration numbers, and authorizations for each facility or controls. The inventory must be available for review by TCEQ and must include, but is not limited, to the following, as applicable:

- a. Composting facilities;
- b. Equipment storage and maintenance facilities;
- c. Fuel storage facilities;
- d. Hazardous waste disposal facilities;
- e. Hazardous waste handling and transfer facilities;
- f. Incinerators;
- g. Landfills;
- h. Materials storage yards;
- i. Pesticide storage facilities;
- j. Buildings, including schools, libraries, police stations, fire stations, and office buildings;

- k. Parking lots;
- l. Golf courses;
- m. Swimming pools;
- n. Public works yards;
- o. Recycling facilities;
- p. Salt storage facilities;
- q. Solid waste handling and transfer facilities;
- r. Street repair and maintenance sites;
- s. Vehicle storage and maintenance yards; and
- t. Structural stormwater controls.

(2) Training and Education

All permittees shall inform or train appropriate employees involved in implementing pollution prevention and good housekeeping practices. All permittees shall maintain a training attendance list for inspection by TCEQ when requested.

(3) Disposal of Waste Material - Waste materials removed from the small MS4 must be disposed of in accordance with 30 TAC Chapters 330 or 335, as applicable.

(4) Contractor Requirements and Oversight

- a. Any contractors hired by the permittee to perform maintenance activities on permittee-owned facilities must be contractually required to comply with all of the stormwater control measures, good housekeeping practices, and facility-specific stormwater management operating procedures described in Parts III B.5.(2)-(6).
- b. All permittees shall provide oversight of contractor activities to ensure that contractors are using appropriate control measures and SOPs. Oversight procedures must be developed before the end of the permit term and maintained on site and made available for inspection by TCEQ.

(5) Municipal Operation and Maintenance Activities

a. Assessment of permittee-owned operations

All permittees shall evaluate operation and maintenance (O&M) activities for their potential to discharge pollutants in stormwater, including but not limited to:

- (i) Road and parking lot maintenance may include such areas as pothole repair, pavement marking, sealing, and re-paving;
- (ii) Bridge maintenance may include such areas as re-chipping, grinding, and saw cutting;
- (iii) Cold weather operations, including plowing, sanding, and application of deicing and anti-icing compounds and maintenance of snow disposal areas; and
- (iv) Right-of-way maintenance, including mowing, herbicide and pesticide application, and planting vegetation.

- b. All permittees shall identify pollutants of concern that could be discharged from the above O&M activities (for example, metals; chlorides; hydrocarbons such as benzene, toluene, ethyl benzene, and xylenes; sediment; and trash).
- c. All permittees shall develop and implement a set of pollution prevention measures that will reduce the discharge of pollutants in stormwater from the above activities. These pollution prevention measures may include the following examples:
 - (i) Replacing materials and chemicals with more environmentally benign materials or methods;
 - (ii) Changing operations to minimize the exposure or mobilization of pollutants to prevent them from entering surface waters; and
 - (iii) Placing barriers around or conducting runoff away from deicing chemical storage areas to prevent discharge into surface waters.
- d. Inspection of pollution prevention measures - All pollution prevention measures implemented at permittee-owned facilities must be visually inspected at a frequency determined by the permittee to ensure they are working properly. A log of inspections must be maintained and made available for review by the TCEQ upon request.

(6) Structural Control Maintenance

If BMPs include structural controls, maintenance of the controls must be performed at a frequency determined by the permittee and consistent with maintaining the effectiveness of the BMP.”

5.2 Existing Activities

WFDD and the Districts contract out all services including mowing, infrastructure repairs, and plant operations. Contractors are responsible for the maintenance of their vehicles and equipment. The following are municipal operations managed by WFDD and the Districts’ contractors:

- MUD Wastewater Treatment Plants (Districts only)
- MUD Water Plants (Districts only)
- Drainage system maintenance (WFDD and the Districts)

5.3 Program Implementation

5.3.1 Structural Control Maintenance

As part of the evaluation of the existing stormwater management system, an inventory of existing WFDD and District-managed structural controls has been established. An operator’s inspection and maintenance schedule has been established for these structural controls to promote their effective operation for stormwater quality treatment.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
MS4 owned facilities and structural control maintenance and inspection programs	Inspect and maintain 100% of MS4s' owned facilities and structural controls.	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)

5.3.2 Contractor Requirements and Oversight

WFDD and the Districts will require contractors hired to perform maintenance activities on permittee-owned facilities to be contractually required to comply with all of the stormwater control measures, good housekeeping practices, and facility-specific stormwater management operating procedures. WFDD and the Districts will provide oversight of contractor activities and will evaluate the potential of right-of-way maintenance activities (mowing, herbicide and pesticide application, and planting vegetation) for the potential to discharge pollutants to stormwater.

Measureable Goals

BMP/Activity	Quantifiable Target	Deadline
Oversight procedures for stormwater management	Continue oversight and procedures will be maintained on site and made available for inspection by TCEQ – complete at least one inspection annually	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)

Rationale

WFDD and the Districts will provide oversight to ensure that contractors are using appropriate control measures and SOPs.

5.3.3 Waste Disposal

WFDD and the Districts will require operation and maintenance contractors to properly dispose of wastes including dredge spoil, accumulated sediments, and floatables removed from the MS4, or structural controls, or collected as a result of municipal operations and maintenance activities.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
Proper waste disposal	Complete one evaluation of 100% of WFDD and the Districts' facilities for proper waste disposal practices	January 23, 2020 (end of Year 1)
Proper waste disposal	Complete one annual review and inspection of WFDD and the Districts' facilities for proper waste disposal	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)

Rational

Willow Fork Drainage District and the Districts will ensure the proper disposal of wastes and minimize the possible migration of wastes to receiving waters. The measurable goals address the implementation of this BMP.

5.3.4 Municipal Employee Training

WFDD and the Districts contract out all services which would require pollution prevention and good housekeeping training including, mowing, infrastructure maintenance and repairs, and plant operations. WFDD and the Districts will provide copies of the permit and SWMP, and contractually require training for WFDD and the Districts' contractors to prevent and reduce stormwater pollution from municipal-type activities. Training programs ensure that stormwater quality programs are properly implemented and BMPs are properly installed and maintained.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
Training materials	Provide training materials once annually to WFDD and the Districts' Board of Directors and contractors.	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)
Training	Provide one training session to WFDD and the Districts' Board of Directors and contractors to prevent and reduce stormwater pollution from activities related to municipal operations	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)

Rationale

Training of WFDD and the Districts' contractors will minimize impacts of WFDD and the Districts' operations on stormwater quality.

5.3.5 Litter Control

WFDD and the Districts have a scheduled program for removal of litter from drainage facilities and other District-controlled property by WFDD and the Districts' contractors.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
Litter control program	Complete one annual evaluation of litter control program at municipal operations sites and drainage facilities.	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)

Rationale

This program will employ litter control requirements to minimize the migration of floatables and pollutants to receiving waters.

5.3.6 Good Housekeeping for Municipal Operations

WFDD and the Districts will continue requirements for contractors to maintain good housekeeping at facilities performing municipal type operations.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
Good housekeeping	Complete one annual evaluation of good housekeeping requirements	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)

Rational

Good housekeeping reduces the risk of possible contaminants from reaching the MS4 and impacting stormwater quality.

5.3.7 Facility Inspection Program

WFDD and the Districts require routine inspection of municipal facilities that potentially affect stormwater quality (ex. drinking water and wastewater facilities). This includes routine inspection of facilities and equipment operated by WFDD and those operated by the Districts and inspection of stormwater quality facilities.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
Municipal facility inspections	Inspect 100% of facilities annually	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)
Inspection records	Review 100% of inspection records annually	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)

Rationale

Timely inspection of municipal operations can minimize the discharge of pollutants to the MS4. Inspection of stormwater quality facilities ensures their proper operation.

5.3.8 Spill Prevention and Response

WFDD and the Districts will require contractors to have spill kits available at facilities they operate and to comply with spill prevention and response requirements as appropriate.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
Spill prevention and response	Complete one annual review of contractors' spill kits and their compliance with spill prevention and response requirements	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)

Rationale

Preventing spills from entering the MS4 reduces stormwater quality impacts. The measurable goal addresses the implementation of this BMP.

5.3.9 Sanitary Sewer Systems

The Districts will make improvements to sanitary sewers to reduce overflows, address lift station inadequacies, improve reporting of overflows, and strengthen sanitary sewer use requirements to reduce blockage from fats, oils, and grease.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
Continue making improvements to sanitary sewers to reduce overflows, address lift station inadequacies, improve reporting of overflows, and strengthen sanitary sewer use requirements to reduce blockage from fats, oils, and grease.	Respond to 100% of sanitary sewer overflows and reduction in number of overflows each year	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)

5.3.10 On-Site Sewage Facilities

The Districts will identify and address failing systems and address inadequate maintenance of on-site sewage facilities.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
Review inventory of on-site sewage facilities	Review 100% of on-site sewage facilities and update inventory	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)

5.3.11 Animal Sources

WFDD and the Districts will include procedures for identifying and targeting animal sources such as pet waste and animal stables.

Measurable Goals

BMP/Activity	Quantifiable Target	Deadline
Continue developing inventory of animal sources	Complete one annual review of animal sources and update inventory	January 23, 2020 (end of Year 1) January 23, 2021 (end of Year 2) January 23, 2022 (end of Year 3) January 23, 2023 (end of Year 4) January 23, 2024 (end of Year 5)

Section 6 – MS4 Operators Contributing to the Development and Implementation of the SWMP

Responsible Entity	Entity Representative	Contribution
Willow Fork Drainage District (WFDD)	AECOM and LJA Engineering Inc.	Comply with the TPDES Phase II MS4 Permit and develop and implement the SWMP for the WFDD MS4. Overall administrator for the SWMP providing coordination of the shared SWMP with participating Districts.
Cinco MUD No. 1	BGE	Comply with the TPDES Phase II MS4 Permit and develop and implement the SWMP for the Cinco MUD No. 1 MS4.
Cinco MUD No. 2	AECOM	Comply with the TPDES Phase II MS4 Permit and coordinate with WFDD to develop and implement the SWMP for the Cinco MUD No. 2 MS4.
Cinco MUD No. 3	BGE	Comply with the TPDES Phase II MS4 Permit and coordinate with WFDD to develop and implement the SWMP for the Cinco MUD No. 3 MS4.
Cinco MUD No. 5	Vogler & Spencer Engineering	Comply with the TPDES Phase II MS4 Permit and coordinate with WFDD to develop and implement the SWMP for the Cinco MUD No. 5 MS4.
Cinco MUD No. 6	BGE	Comply with the TPDES Phase II MS4 Permit and coordinate with WFDD to develop and implement the SWMP for the Cinco MUD No. 6 MS4.

Responsible Entity	Entity Representative	Contribution
Cinco MUD No. 7	Pape-Dawson Engineers, Inc.	Comply with the TPDES Phase II MS4 Permit and coordinate with WFDD to develop and implement the SWMP for the Cinco MUD No. 7 MS4.
Cinco MUD No. 8	DEC	Comply with the TPDES Phase II MS4 Permit and coordinate with WFDD to develop and implement the SWMP for the Cinco MUD No. 8 MS4.
Cinco MUD No. 9	Langford Engineering Inc.	Comply with the TPDES Phase II MS4 Permit and coordinate with WFDD to develop and implement the SWMP for the Cinco MUD 9 MS4.
Cinco MUD No. 10	Pape-Dawson Engineers, Inc.	Comply with the TPDES Phase II MS4 Permit and coordinate with WFDD to develop and implement the SWMP for the Cinco MUD 10 MS4.
Cinco MUD No. 12	AECOM	Comply with the TPDES Phase II MS4 Permit and coordinate with WFDD to develop and implement the SWMP for the Cinco MUD No. 12 MS4.
Cinco MUD No. 14	BGE	Comply with the TPDES Phase II MS4 Permit and coordinate with WFDD to develop and implement the SWMP for the Cinco MUD 14 MS4.

The responsible entities identified above confirm that, as contributing MS4 operators, they will comply with the TPDES Phase II MS4 General Permit in the development and implementation of the SWMP. The contribution of each entity is identified above.

Stormwater Management Program Implementation Schedule

Minimum Control Measure	BMP	BMP/Activity	Quantifiable Target	Department/ Person (subject to approval of Board of Directors)	Deadline (by January 23 rd for each year)				
					YR 1 2020	YR 2 2021	YR 3 2022	YR 4 2023	YR 5 2024
1. Public Education, Outreach, and Involvement (a) Public Education and Outreach	1.3.1 Stormwater Public Education Print Materials	Public education materials options and distribution methods	Evaluate 100% of the options and identify the best option in Year 1	WFDD Engineer/ Operator	X				
		Public education print materials	Provide and distribute once annually in 100% of the water utility bills to all district residents	Operator	X	X	X	X	X
		Public education message	Provide message on water utility bills once annually in 100% of the water utility bills to all district residents	Operator	X	X	X	X	X
		Public education material relating to discharges of bacteria	Provide and distribute at least once annually in 100% of the water utility bills to all district residents	Operator	X	X	X	X	X
	1.3.2 Website Stormwater Quality Messages	Stormwater information on the website	Evaluate current stormwater information on website each year and include at least one stormwater quality message update on website each year	WFDD Web Contractor	X	X	X	X	X
	1.3.3 Contractor Employee Training	SWMP and General Permit	Provide copies to Districts and 100% of their contractors	District Engineer/ Operator	X				
		Training	Require 100% of contractors for WFDD and the Districts to provide annual training to applicable employees on the SWMP	District Engineer/ Operator	X	X	X	X	X
	1.3.4 Stormwater Public Education Signage	Public education signs	Inspect and maintain signage annually – 100%	WFDD Operator	X	X	X	X	X
	1.3.5 Storm Drain Decals by Volunteers	Storm drain decals	Distribute the decals to 100% of requests by volunteer groups	WFDD Operator/ Engineer	X				

Stormwater Management Program Implementation Schedule

Minimum Control Measure	BMP	BMP/Activity	Quantifiable Target	Department/ Person (subject to approval of Board of Directors)	Deadline (by January 23 rd for each year)				
					YR 1 2020	YR 2 2021	YR 3 2022	YR 4 2023	YR 5 2024
1. Public Education, Outreach, and Involvement (b) Public Involvement	1.3.8 Public Involvement and Participation	Distribution of SWMP information on website (www.willowforkdrainage.district.com), including posting SWMP and annual reports.	Ensure SWMP and annual reports are located on MS4's website – 100%	WFDD Engineer/Operator	X	X	X	X	X
2. Illicit Discharge Detection and Elimination	2.3.1 Illicit Discharge Regulations/Order(s)	Illicit discharge regulations/orders	Evaluate existing regulation/order(s) in Year 1 that may require modification (complete one evaluation)	District Engineer/Attorney	X				
		Illicit discharge regulations/orders	Modify existing regulation/order(s) in Year 2 that may require modification (complete one modification if needed)	District Engineer/Attorney		X			
	2.3.2 Storm Drainage System Mapping	WFDD storm drainage system map	Continue developing storm drainage system map in Year 1 with additional features (complete at least one update)	WFDD Engineer/Operator	X				
		Additional drainage features	Field verify, identify, locate, and map 100% of additional features annually	WFDD Engineer/Operator	X	X	X	X	X
		Developer-provided information	Complete integration of developer-provided drainage information into the district drainage map as received within 1 year – 100%	WFDD Engineer/Operator	X	X	X	X	X

Stormwater Management Program Implementation Schedule

Minimum Control Measure	BMP	BMP/Activity	Quantifiable Target	Department/ Person (subject to approval of Board of Directors)	Deadline (by January 23 rd for each year)				
					YR 1 2020	YR 2 2021	YR 3 2022	YR 4 2023	YR 5 2024
2. Illicit Discharge Detection and Elimination	2.3.2 Storm Drainage System Mapping	Storm Drainage System Map	Finalize Storm Drainage System Map with additional features in Permit Year 5 – 100%	WFDD Engineer/ Operator					X
2. Illicit Discharge Detection and Elimination	2.3.3 Illicit Discharge Detection and Elimination Program	Complaints received	Respond to 100% of complaints	WFDD/District Operator	X	X	X	X	X
		Illicit Discharge Screening Program protocol	Complete 100% review of Illicit Discharge Screening Program protocol in Year 1	WFDD Engineer/ Operator	X				
		Inspection program	Complete 100% routine inspection program each year.	WFDD Operator	X	X	X	X	X
		Outfall screening	Screen 33% of outfalls per year	WFDD Operator	X	X	X	X	X
	2.3.4 Household Hazardous Waste Collection Event	Household hazardous waste collection events	Publicize collection events to residents (at least once annually)	WFDD Web Contractor	X	X	X	X	X

Stormwater Management Program Implementation Schedule

Minimum Control Measure	BMP	BMP/Activity	Quantifiable Target	Department/ Person (subject to approval of Board of Directors)	Date Due (by January 23 rd for each year)				
					YR 1 2020	YR 2 2021	YR 3 2022	YR 4 2023	YR 5 2024
3. Construction Site Stormwater Runoff Control	3.3.1 Site Plan Review Program	Review process for stormwater quality, including criteria checklists and submitted SWPPPs	Complete one evaluation of current review process in Permit Year 1 and determine if updates are needed.	WFDD Engineer	X				
		Construction site plan review program	Continue 100% of plan reviews as they are submitted	District Engineer	Prior to planned construction				
	3.3.2 Create Regulatory Mechanism	Regulatory mechanism to address erosion and sediment controls	Complete one evaluation of regulatory mechanism to address erosion and sediment controls to determine if adequate regulations are in place	District Engineer	X				
		Implement regulation	100% compliance	District Engineer	Prior to planned construction				
	3.3.3 Erosion and Sediment Control Implementation	Soil stabilization measures	Require 100% of soil stabilization measures, and implementation of BMPs to control pollutants from equipment and vehicle washing and other wash waters	WFDD Engineer/ Operator	X	X	X	X	X

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					YR 1 2020	YR 2 2021	YR 3 2022	YR 4 2023	YR 5 2024
3. Construction Site Stormwater Runoff Control	3.3.3 Erosion and Sediment Control Implementation	Require operators to minimize exposure to stormwater of building materials, building products, construction wastes, trash, landscape materials, fertilizers, pesticides, herbicides, detergents, sanitary waste, and other materials	No complaints or reports (0 total) in Permit Years 1 through 5 and 100% of operators will be required to comply	WFDD Engineer/ Operator	X	X	X	X	X
		Minimize the discharge of pollutants from spills and leaks in Permit Years 2 through 5. Program prohibits illicit discharges such as wash out wastewater, fuels, oils, soaps, solvents, and dewatering activities	No complaints or reports (0 total) in Permit Years 1 through 5 and ensure 100% compliance that the construction site has developed a SWPPP in accordance with the TPDES Construction General Permit TXR150000.	WFDD Engineer/ Operator	X	X	X	X	X

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3. Construction Site Stormwater Runoff Control	3.3.4 Construction Site Inspection Program	Inspection plan	Complete one re-evaluation of inspection plan	WFDD Engineer	X				
		MS4 staff training procedures, inspection plan, and procedure checklists	Complete one evaluation of staff training procedures, inspection plan, and procedure checklists	District Engineer	X				
		Construction site inspections	Inspect 100% of construction sites annually	District Engineer/ District Operator	X	X	X	X	X
	3.3.5 Reporting Hotline	Reporting hotline	Publicize number on website and on stormwater messages on 100% of utility bills	WFDD Web Contractor/ WFDD Operator	X				
		Hotline reports	Respond to 100% of reports annually	District Operator	X	X	X	X	X
	3.3.6 Distribution of Brochure with Plan Sets	Brochures on good housekeeping, waste controls, stormwater pollution minimization, and the TPDES Construction General Permit No. TXR150000	Brochures have been printed and distributed to 100% of construction site operators with returned plan sets	District Engineer	X	X	X	X	X

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4. Post-Construction Stormwater Management in New Development and Redevelopment	4.3.1 Revise Rules and Regulations	WFDD and District Rate Orders and Rules and Regulations that address runoff from new development and redevelopment projects	Complete one review of existing Rate Orders and Regulations and develop draft modifications (if required)	Attorney	X				
		Modifications to the WFDD and District Rate Orders and Rules and Regulations	Finalize 100% of modifications (if required)	Attorney		X			
		Modifications to the WFDD and District Rate Orders and Rules and Regulations	Implement 100% of modifications for remainder of permit term (if required)	District Engineer/ Operator			X	X	X
	4.3.2 Plan Review	Review process and criteria	Complete one evaluation of current review process and criteria for appropriate measures and potential updates	WFDD Engineer		X			

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4. Post-Construction Stormwater Management in New Development and Redevelopment	4.3.2 Plan Review	Criteria checklists or existing plan review checklists/procedures to provide stormwater quality and long-term inspection and maintenance of BMPs for post-construction new development and redevelopment	Complete one review of criteria checklists or existing plan review checklists/procedures to provide stormwater quality and long-term inspection and maintenance of BMPs for post-construction new development and redevelopment	WFDD Engineer		X			
		Updated procedures	Implement 100% of updated procedures in review of all submitted plans (if modifications are required)	District Engineer			X	X	X
	4.3.3 Distribution of Stormwater Brochure with Plan Sets	Print materials	Print and distribute brochure on good housekeeping, waste controls, stormwater pollution minimization, and TPDES Construction General Permit No. TXR150000 compliance to 100% of returned plan sets during plan review in Permit Years 2 through 5	District Engineer		X	X	X	X

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4. Post-Construction Stormwater Management in New Development and Redevelopment	4.3.4 Homeowner/ Yard Service Education Materials	Education materials on proper fertilizer and pesticide application	Complete one review of education materials on proper fertilizer and pesticide application	WFDD Engineer	X				
		Information on proper fertilizer and pesticide application	Provide one water utility bill message with information on proper fertilizer and pesticide application to 100% of residents (once annually)	WFDD Web Contractor	X	X	X	X	X

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5. Pollution Prevention and Good Housekeeping for Municipal Operations	5.3.1 Structural Control Maintenance	Structural control maintenance and inspection programs	Inspect and maintain 100% of MS4s' owned facilities and structural controls.	District Engineer/ Operator	X	X	X	X	X
	5.3.2 Contractor Requirements and Oversight	Oversight procedures for stormwater management	Continue oversight and procedures will be maintained on site and made available for inspection by TCEQ – complete at least one inspection annually	District Engineer	X	X	X	X	X
	5.3.3 Waste Disposal	Proper waste disposal	Complete one evaluation of 100% of WFDD and the Districts' facilities for proper waste disposal practices	WFDD Operator/ Engineer	X				
		Proper waste disposal	Complete one annual review and inspection of WFDD and the Districts' facilities for proper waste disposal	WFDD Operator/ Contractor	X	X	X	X	X
	5.3.4 Municipal Employee Training	Training materials	Provide training materials once annually to WFDD and the Districts' Board of Directors and contractors.	District Engineer/ Operator	X	X	X	X	X
		Training	Provide one training session to WFDD and the Districts' Board of Directors and contractors to prevent and reduce stormwater pollution from activities related to municipal operations	District Engineer/ Operator	X	X	X	X	X
	5.3.5 Litter Control	Litter control program	Complete one annual evaluation of litter control program at municipal operations sites and drainage facilities.	WFDD Engineer/ Operator	X	X	X	X	X

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5. Pollution Prevention and Good Housekeeping for Municipal Operations	5.3.6 Good Housekeeping for Municipal Operations	Good housekeeping	Complete one annual evaluation of good housekeeping requirements	WFDD Operator	X	X	X	X	X
	5.3.7 Facility Inspection Program	Municipal facility inspections	Inspect 100% of facilities annually	WFDD Engineer	X	X	X	X	X
		Inspection records	Review 100% of inspection records annually	WFDD Engineer/Operator	X	X	X	X	X
	5.3.8 Spill Prevention and Response	Spill prevention and response	Complete one annual review of contractors' spill kits and their compliance with spill prevention and response requirements	WFDD Operator	X	X	X	X	X
	5.3.9 Sanitary Sewer Systems	Continue making improvements to sanitary sewers to reduce overflows, address lift station inadequacies, improve reporting of overflows, and strengthen sanitary sewer use requirements to reduce blockage from fats, oils, and grease.	Respond to 100% of sanitary sewer overflows and reduction in number of overflows each year	District Engineer/Operator	X	X	X	X	X

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5. Pollution Prevention and Good Housekeeping for Municipal Operations	5.3.10 On-Site Sewage Facilities	Review inventory of on-site sewage facilities	Review 100% of on-site sewage facilities and update inventory	District Engineer/ Operator	X	X	X	X	X
	5.3.11 Animal Sources	Continue developing inventory of animal sources	Complete one annual review of animal sources and update inventory	WFDD Engineer/ Operator	X	X	X	X	X