

**STORMWATER
MANAGEMENT
PROGRAM
ANNUAL REPORT**

*Developed in accordance with the requirements of TEXAS
COMMISSION ON ENVIRONMENTAL QUALITY -
TEXAS POLLUTANT DISCHARGE ELIMINATION
SYSTEM - TPDES GENERAL PERMIT TXR040000*



**LRGV TPDES Stormwater Task Force
Founded in 1998**

Permit Term:

August 14, 2014 – September 30, 2015

Prepared December 2015

City of Alamo
City of Alton
City of Brownsville
Cameron County
Cameron County Drainage District #1
City of Donna
City of Edinburg
City of La Feria
City of La Joya
City of Los Fresnos
City of Mission
City of Palmview
City of Primera
City of San Benito
City of San Juan
City of Weslaco

A. General Information

Table 1.0 identifies the members of the LRGV TPDES Stormwater Task Force. The permit period is identified as August 14, 2014 to September 30, 2015 because all the following MS4s are operating under a new regional SWMP. The SWMP approved during the first permit period has been completely revised to incorporate a comprehensive regional program.

Table 1-0			
LOWER RIO GRANDE VALLEY TPDES STORMWATER TASK FORCE			
MS4	Permit No.	2010 Population	MS4
Alamo	TXR040289	18,353	2
Alton	TXR040162	12,341	2
Brownsville	TXR040264	175,023	4
Cameron County	TXR040051	N/A	2
Cameron County Drainage District #1	TXR040236	N/A	2
Donna	TXR040165	15,798	2
Edinburg	TXR040323	77,100	3
La Feria	TXR040286	7,302	1
La Joya	TXR040288	3,985	1
Los Fresnos	TXR040270	5,542	1
Mission	TXR040168	77,058	3
Palmview	TXR040536	5,460	1
Primera	TXR040002	4,070	1
San Benito	TXR040161	24,250	2
San Juan	TXR040167	33,856	2
Weslaco	TXR040262	35,670	2

The following are the contact persons for each Task Force member:

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B. Narrative Provisions

1. Provide a brief description on the status of complying with permit conditions according to Part V of the permit. Include compliance with the SWMP that TCEQ approved, compliance with record keeping and reporting requirements, and compliance with permit eligibility requirements.

	Yes	No	Explain
Permittee is currently in compliance with the SWMP as submitted to and approved by the TCEQ.	X		
Permittee is currently in compliance with recordkeeping and reporting requirements.	X		
Permittee meets the eligibility requirements of the permit	X		

2. Each MS4 is required to assess the appropriateness of the BMPs in reducing the discharge of pollutants to the maximum extent practicable (MEP). Provide a general assessment of the appropriateness of the selected BMPs, including whether any of the selected BMPs are not appropriate.

Has the permittee determined that any of the selected BMPs are not appropriate for reducing the discharge of pollutants in storm water? _____ Yes X No

See Table 2.0 for more details.

3. Describe progress towards reducing the discharge of pollutants. Summarize any information used to evaluate reductions in the discharge of pollutants. This information can be included in a tabular format as provided in the form, or attached in a narrative format.

At this period, the Task Force has not quantified any stormwater data. Pursuant to the SWMP, the Task Force will be assessing the regional program during Year 1 and Year 2 of the permit period. Information to assess the progress of the SWMP in reducing discharge of pollutants will be available tentatively by Year 3 of the permit period.

4. Provide a general evaluation of the success of the implementation of the measurable goals, including any obstacles or challenges in meeting the SWMP schedule, etc.

The Task Force is not immune to facing challenges regarding program success and is working toward full compliance of the SWMP. Although the Task Force combines its resources to assure compliance with the TPDES program, challenges stem from limited budget, staff and regulatory enforcement support.

<p>→<u>Budget</u>- lack of sufficient funding stream, budget difficult to attain sustainability</p> <p>→<u>Resources</u>- lack of identified resources to fund MS4 program</p> <p>→<u>Interdepartmental cooperation</u>- adequate training and involvement from other city departments. Exploration of alternative outreach opportunities.</p>	<p>→<u>ISD's</u>- Taskforce municipalities, A&M Kingsville and Arroyo Colorado Watershed Partnership work together with local school districts to educate students & parents through presentations (classroom or other), city events and related media outreach.</p> <p>→<u>Scholarship</u> - A&M Kingsville & Taskforce have developed and implemented a regional scholarship program for Environmental or Civil Engineering prospects offered to at least 16 regional school districts.</p>
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<p>→<u>Lack of Storm Water Professionals</u>- not enough trained staff regionally, lack of understanding of the rules.</p> <p>→<u>Task Force</u>- Task Force is part of a team that has been instrumental in compliance with MS4 requirements to date. Working closely, the Task Force municipalities help ensure regional understanding & support of the SWMP program goals & assist in increasing media outreach through various outlets.</p>	<p>→<u>Training</u>- In conjunction with A&M Kingsville, the Task Force has implemented training programs, workshops and webinars & many other activities</p> <p>→<u>Enforcement</u> – Lack of support from TCEQ Regional and State office. Many MS4s in our region remain noncompliant with the TCEQ TPDES programs which hinders regional programs.</p>
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See Table 3.0 for more details.

C. Stormwater Monitoring Data

Indicate whether the MS4 has conducted monitoring of stormwater quality, including analytical data and visual observations. Provide an explanation along with any monitoring data used to evaluate the success of the SWMP at reducing pollutants to the maximum extent practicable. Include a discussion of results with the explanation or summary.

At this period, the Task Force has not conducted any monitoring of stormwater quality. Pursuant to the SWMP, the Task Force will be assessing the regional program during Year 1 and Year 2 of the permit period. Information to assess the progress of the SWMP in conducting any monitoring of stormwater quality will be available tentatively by Year 3 of the permit period.

D. Impaired Waterbodies

There are no EPA-approved TMDLs within the jurisdictions of the Task Force membership. Moreover, the SWMP is not subject to Part II.D.4.a. With regards to bacteria source determination and the bacteria impairment program associated with the SWMP (Chapter 8 of the SWMP), the Task Force has developed a workgroup to assist in developing a source determination strategy that includes review of pertinent historical literature, assessing existing EPA (RCRA, CERCLA, etc.), TCEQ (MSW, LPST, etc.) and other similar permit/registration databases, review of local health department records, review of past and active local and/or regional study findings, and review of other pertinent documentation. The assessment is still ongoing and no reporting of this information is available at this time. The Task Force will continue the assessment during Year 2 of the permit period. The Task Force will identify BMPs and ensure that the SWMP includes focused BMPs, along with corresponding measurable goals, that the permittee will implement, to reduce, the discharge of pollutant(s) of concern that contribute to the impairment of the water body. The timeline of this BMP will be adjusted accordingly. The Task Force anticipates this BMP will be complete by December 2016.

E. Stormwater activities next reporting year

Describe any stormwater activities the MS4 operator has planned for the next reporting year. Use the provided table or attach a summary, as appropriate.

- a. M.C.M. 1- PUBLIC EDUCATION, OUTREACH, AND INVOLVEMENT

1. Expand outreach to include additional school campuses, professional organizations
 2. Continue webcasts, professional courses (soil erosion, GIS, inspections)
 3. Conduct 18th annual stormwater conference.
 4. Improve social media and websites
 5. Continue with public hearings
 6. Create possible list serve for feedback
 7. Promote additional volunteer efforts
- b. M.C.M. 2 - ILLICIT DISCHARGE DETECTION AND ELIMINATION
1. Specific Illicit Discharge Detection and Elimination SW Ordinance (IDDE) Adoption and training
 2. Enforcement of IDDE SW Ordinance
- c. M.C.M. 3 - CONSTRUCTION SITE STORM-WATER RUNOFF CONTROL
1. Develop, adoption and provide training on additional ordinances
 2. Enforcement of SW Ordinances
- d. M.C.M. 4 - POST-CONSTRUCTION STORM-WATER MANAGEMENT
1. Specific Post-Construction Adoption and training
 2. Enforcement of Post-Construction SW Ordinance
 3. Green Ordinance Development
- e. M.C.M. 5 - POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS
1. Finalize Standard Operating Procedures
 2. Establish electronic record keeping

See Table 2.0 and 3.0 for further details.

F. SWMP Modifications and Additional Information

No changes to SWMP proposed.

G. Additional BMPs

No changes to SWMP proposed.

H. Additional Information

The Task Force is comprised of sixteen (16) MS4s listed in Section A, Table 1-0 of this annual report. All MS4s use a standard interlocal agreement that provides the structure, administration and legal authority of the organization. The legal name of the Task Force is **Lower Rio Grande Valley Texas Pollutant Discharge Elimination System Stormwater Task Force**. Each member is contracted with Texas A&M University-Kingsville via a local interlocal agreement renewed annually. An example of the interlocal is provided in Appendix A. This is a system-wide annual report including information for all permittees. All represented permittees have signed the report in accordance with signatory requirements, 30 Texas Administrative Code (TAC) §305.128.

I. Construction Activities

1. Provide the number of construction projects in the jurisdiction of the MS4 where the permittee was not the construction site operator (as provided in submittals to the MS4 operator via notices of intent or site notices).

Pursuant to the approved SWMP, this MCM and subsequently the corresponding BMPs, is being assessed during Year 1 and 2 of the permit period. No data is available during this reporting period. The Task Force is assessing individual programs, and is determining the feasibility of expanding the existing programs to a regional scale. This data will be provided in the next reporting period. No changes are proposed at this time.

2. Does the permittee utilize the seventh MCM related to construction? To answer “Yes,” this must have been requested on the Notice of Intent (NOI) or on an NOC and approved by the TCEQ.

This MCM is not applicable.

J. Certification

For shared SWMPs, it would be acceptable to submit separate signature pages for each operator participating in the shared SWMP along with one copy of the system-wide annual report.

Solely one system-wide report is submitted, with signature pages.

Table 2.0 – BMP Status (All MS4 Levels)

MCM(s)	BMP	Year 1 Milestone(s) Permit Period 2	New or Revised (submit NOC as needed)	Start Date	Status / Completion Date (completed, in progress, not started)
Education, Outreach, and Involvement	3.2.0 Assess Existing programs	Continued with program.		August 2014	In progress/ongoing
Education, Outreach, and Involvement	3.2.1 Utility Inserts and /or Mail outs	Continued with program.		August 2014	In progress/ongoing
Education, Outreach, and Involvement	3.2.2 Website	Continued with program.		August 2014	In progress/ongoing
Education, Outreach, and Involvement	3.2.3 Classroom Presentations	Continued with program.		August 2014	In progress/ongoing
Education, Outreach, and Involvement	3.2.4 Stenciling	Continued with program. Will work with planning and engineering department to improve program and to propose stenciling for all new development. Encouraging stenciling to custom made manhole covers to developers.		August 2014	In progress/ongoing
Education, Outreach, and Involvement	3.2.5 Brochures and Videos	Continued with program. Program brochures are located at major buildings and offices. Storm Water PSA's on city website.		August 2014	In progress/ongoing
Education, Outreach, and Involvement	3.2.6 Signage	Continued with program.		August 2014	In progress/ongoing
Education, Outreach, and Involvement	3.2.7 Community Outreach	Continued with Program. Informational brochures placed at city buildings and in pertinent offices.		August 2014	In progress/ongoing
Education, Outreach, and Involvement	3.2.8 Education -General Watershed Protection Plan (non-ACWP BMP)	Continue with Program. Arroyo Colorado Watershed Partnership helps create outreach materials, newsletter and similar educational materials. All material utilized to educate community.		August 2014	In progress/ongoing

Table 2.0 – BMP Status (All MS4 Levels)

MCM(s)	BMP	Year 6 Milestone(s) Continue with SWMP	New or Revised (submit NOC as needed)	Start Date	Status / Completion Date (completed, in progress, not started)
Education, Outreach, and Involvement	3.2.9 Public Meetings	Continued with program.		August 2014	In progress/ongoing
Education, Outreach, and Involvement	3.2.10 Advisory Committee	Continued membership with LRGV Storm Water Task Force		August 2014	In progress/ongoing
Education, Outreach, and Involvement	3.2.11 Hotline	Continued with program.		August 2014	In progress/ongoing
IDD&E	4.2.0 Assessment of existing IDD&E program	Continued with Program.		August 2014	In progress/ongoing
IDD&E	4.2.1 Mapping	Continued with Program.		August 2014	In progress/ongoing
IDD&E	4.2.2 IDD&E Ordinance	Continued with Program.		August 2014	In progress/ongoing
IDD&E	4.2.3 Business Education	Continued with Program.		August 2014	In progress/ongoing
IDD&E	4.2.4 Illicit Discharge Inspections	Continued with Program.		August 2014	In progress/ongoing
IDD&E	4.2.5 Business Site Inspections	Continued with Program.		August 2014	In progress/ongoing
IDD&E	4.2.6 HHHW	Continued with Program.		August 2014	In progress/ongoing
IDD&E	4.2.7 Business Site Inspections	Continued with Program.		August 2014	In progress/ongoing
IDD&E	4.2.8 Hot line	Continued with Program.		August 2014	In progress/ongoing
Construction	5.2.0 Assess construction BMP programs	Continued with Program.		August 2014	In progress/ongoing

Table 2.0 – BMP Status (All MS4 Levels)

MCM(s)	BMP	Year 6 Milestone(s) Continue with SWMP	New or Revised (submit NOC as needed)	Start Date	Status / Completion Date (completed, in progress, not started)
Construction	5.2.1 Erosion Control Ordinance	Continued with Program.		August 2014	In progress/ongoing
Construction	5.2.2 Construction Site Plan Review	Continued with Program.		August 2014	In progress/ongoing
Construction	5.2.3 Site Inspection and Policy Enforcement	Continued with Program.		August 2014	In progress/ongoing
Construction	5.2.4 Training	Continued with Program.		August 2014	In progress/ongoing
Construction	5.4.5 Construction Site Waste Management	Continued with Program.		August 2014	In progress/ongoing
Construction	5.4.6 Outreach	Continued with Program.		August 2014	In progress/ongoing
Post Construction	6.2.0 Assess Post-Construction Program	Continued with Program.		August 2014	In progress/ongoing
Post Construction	6.2.1 Post-Construction Ordinance	Continued with Program.		August 2014	In progress/ongoing
Post Construction	6.2.2 Drainage Design Policy	Continued with Program.		August 2014	In progress/ongoing
Post Construction	6.2.3 BMP Inspection and Maintenance	Continued with Program.		August 2014	In progress/ongoing
Post Construction	6.2.4 Land Use	Continued with Program.		August 2014	In progress/ongoing
Housekeeping	7.2.0 Assess Housekeeping programs	Continued with Program.		August 2014	In progress/ongoing
Housekeeping	7.2.1 O&M	Continued with Program.		August 2014	In progress/ongoing
Housekeeping	7.2.2 Street Sweeping	Continued with Program.		August 2014	In progress/ongoing
Housekeeping	7.2.3 Training	Continued with Program.		August 2014	In progress/ongoing
Housekeeping	7.2.4 SOP Program	Continued with Program.		August 2014	In progress/ongoing
Housekeeping	7.2.5 Site inspections	Continued with Program.		August 2014	In progress/ongoing

Table 2.0 – BMP Status (All MS4 Levels)

MCM(s)	BMP	Year 6 Milestone(s) Continue with SWMP	New or Revised (submit NOC as needed)	Start Date	Status / Completion Date (completed, in progress, not started)
Housekeeping	7.2.6 Collection and Disposal of Waste	Continued with Program.		August 2014	In progress/ongoing
Impaired Water Bodies BMPs	8.2.1 Source determination	Continued with Program.		August 2014	In progress/ongoing
Impaired Water Bodies BMPs	8.2.2 Impairment Program	Continued with Program.		August 2014	In progress/ongoing
Impaired Water Bodies BMPs	8.2.3 Workgroup	Continued with Program.		August 2014	In progress/ongoing
Impaired Water Bodies BMPs	8.2.4 Reporting	Continued with Program.		August 2014	In progress/ongoing
Reporting	15.2.1 Reporting	Annual Report		August 2014	In progress/ongoing

Table 2.0 – BMP Status (MS4 Levels II, III, IV and non-traditional)

MCM(s)	Level	BMP	Year 6 Milestone(s) Continue with SWMP	New or Revised (submit NOC as needed)	Start Date	Status / Completion Date (completed, in progress, not started)
IDD&E	II, III IV	10.2.1 OSSF program	Continued with Program.		August 2014	In progress/ongoing
IDD&E	IV	10.2.2 Identify priorities	Continued with Program.		August 2014	In progress/ongoing
IDD&E	IV	10.2.3 Field Screening	Continued with Program.		August 2014	In progress/ongoing
IDD&E	N	10.2.4 Notification	Continued with Program.		August 2014	In progress/ongoing
IDD&E	III, IV	10.2.5 Source elimination	Continued with Program.		August 2014	In progress/ongoing
Construction	III, IV	11.2.1 Inventory	Continued with Program.		August 2014	In progress/ongoing
Post Construction	IV	12.2.1 Inspection program	Continued with Program.		August 2014	In progress/ongoing
Housekeeping	III, IV	13.2.1 Stormwater O&M	Continued with Program.		August 2014	In progress/ongoing
Housekeeping	III, IV	13.2.2 Roadway O&M	Continued with Program.		August 2014	In progress/ongoing
Housekeeping	III, IV	13.2.3 Mapping	Continued with Program.		August 2014	In progress/ongoing
Housekeeping	III, IV	13.2.4 SOPs	Continued with Program.		August 2014	In progress/ongoing
Housekeeping	III, IV	13.2.5 High Priority	Continued with Program.		August 2014	In progress/ongoing
Housekeeping	III, IV	13.2.6 Inspections	Continued with Program.		August 2014	In progress/ongoing
Housekeeping	IV	13.2.7 Pesticides, herbicides	Continued with Program.		August 2014	In progress/ongoing
Industrial	IV	14.2.1 Identify and control	Continued with Program.		August 2014	In progress/ongoing

Table 3.0 – Measurable Goals Status (All MS4s)

MCM(s)	Measurable Goal(s)	Success Met Goals in Year 1 of Permit Period 2 unless otherwise noted.	Proposed Changes (submit NOC as needed)
Outreach, Education and Participation	<p>3.2.0 Assess Programs</p> <p>Permittees began to assess program elements that were described in the previous permit to continue reducing the discharge of pollutants from the MS4 to the MEP. The program will, at a minimum define the goals and objectives of the program based on high priority community-wide issues, identify the target audience(s), develop or utilize appropriate educational materials, and determine cost effective and practical methods and procedures.</p>	<p>Met Goal and ongoing. Additional reporting after this permit year.</p>	<p>None</p>
Outreach, Education and Participation	<p>3.2.1 Utility Inserts and/or Mail outs:</p> <p>Outreach materials in the forms of small brochures, informative handouts or fact sheets will continue to be distributed with municipal water utility bills and/or mailouts as budget allows. This BMP program was expanded to include a self-service area located in a public facility (library, city hall, main office, etc.) where community members, visitors, students, and other individuals can obtain outreach materials like brochures, announcements and factsheets. Information includes various topics like waste oil disposal, use of pesticides and fertilizers on landscaping, household hazardous waste, water quality, and the SWMP in general. This program uses existing outreach materials developed by the LTSTF, TCEQ, EPA and other organizations.</p>	<p>Met Goal</p>	<p>None</p>
Outreach, Education and Participation	<p>3.2.2 Website</p> <p>All websites were developed and/or enhanced</p>	<p>Met Goal</p>	<p>None</p>
Outreach, Education and Participation	<p>3.2.3 Classroom Outreach</p> <p>A curriculum with associated materials and training is available and advertised to classroom teachers from various ISDs located within jurisdictions of MS4 stakeholders. Program materials include curriculum on water quality and water conservation, stormwater pollution prevention, and promotion of the SWMP. Classroom visits are conducted by the MS4 that include guest speakers. Program has been successful and continues every year.</p>	<p>Met Goal</p>	<p>None</p>

<p>Outreach, Education and Participation</p>	<p style="text-align: center;">3.2.4 Stenciling</p> <p>A successful storm drain stenciling program was initiated by the LTSTF during the last permit period. Using grant funding and local funding local government staff provided stormwater education programs and facilitated storm drain stenciling activities with youth and citizens' organizations, and as part of their stormwater management program. The LTSTF continues to facilitate the development of partnerships with local youth service groups to perform a significant portion of the storm drain stenciling work as needed. This year, work primarily focused on planning, alternatives, cost effective options, and grant opportunities. Additional field programs will commence next year and subsequent years.</p>	<p style="text-align: center;">Met Goal</p>	<p style="text-align: center;">None</p>
<p>Outreach, Education and Participation</p>	<p style="text-align: center;">3.2.5 Brochures and Videos</p> <p>The LTSTF has produced various brochures during the previous permit period and successfully continues to deliver to the region. Topics include soil erosion prevention, rain harvesting, low impact development, and Arroyo Colorado watershed protection topics. Additional videos were created in 2015 and can be viewed on our websites.</p>	<p style="text-align: center;">Met goal</p>	<p style="text-align: center;">None</p>
<p>Outreach, Education and Participation</p>	<p style="text-align: center;">3.2.6 Signage</p> <p>Stormwater pollution prevention signs continue to be designed, produced and installed along major intersections within the MS4 membership of the LTSTF, at billboards, at constructions sites and activities/events. The signs bear the logos from the LTSTF, the ACWP and the MS4.</p>	<p style="text-align: center;">Met Goal</p>	<p style="text-align: center;">None</p>
<p>Outreach, Education and Participation</p>	<p style="text-align: center;">3.2.7 Community Outreach:</p> <p>The LTSTF provides educational and outreach materials to the community, including brochures, fact sheets and handouts. These materials are made available at City Halls, and throughout public-owned facilities. Materials are made available to developers, businesses, and contractors during the planning and permitting processes. The LTSTF promotes its stormwater pollution prevention outreach program at various annual community events. Booths, brochures, children- friendly materials, and other similar approaches are used. The LTSTF has developed partnerships with various regional entities and coordinates an annual conference that promotes the SWMPs of the region and the ACWPP. This highly successful conference is held annually at South Padre Island. This BMP will continue to be developed. A&M Kingsville has been contracted to deliver the EPA's regional conference from 2016-2021, this conference will be held in the LRGV 2 years during the contract period and during the MS\$ permit period.</p>	<p style="text-align: center;">Met Goal</p>	<p style="text-align: center;">None</p>
<p>Outreach, Education and Participation</p>	<p style="text-align: center;">3.2.8 Education</p> <p>The LTSTF will continue to work closely with the ACWP to implement this BMP. The impairment of the Arroyo Colorado is of great concern to our region.</p>	<p style="text-align: center;">Met Goal</p>	<p style="text-align: center;">None</p>

Outreach, Education and Participation	<p style="text-align: center;">3.2.9 Public Meetings</p> <p>Annual public meetings are conducted to provide citizens with the opportunity to discuss various viewpoints and provide input concerning stormwater quality issues. Meetings are held by individual MS4 permittees. There are no regional meetings held at this time.</p>	Met Goal	None
Outreach, Education and Participation	<p style="text-align: center;">3.2.10 Advisory Workgroup</p> <p>The Task Force organization serves as the advisory workgroup for the MS4 partners. The group meets frequently.</p>	Met Goal	None
Outreach, Education and Participation	<p style="text-align: center;">3.2.11 Hotline</p> <p>A Stormwater Hotline has been developed and implemented by the majority of the MS4s to promote outreach, enforce policy and to facilitate public involvement. Those with limited resources utilize the Police and Fire departments dispatchers and their after-hours numbers.</p>	Met Goal	None
IDD&E	<p style="text-align: center;">4.2.0 Assess IDD&E Program</p> <p>Permittees began to assess program elements that were described in the previous permit to continue reducing the discharge of pollutants from the MS4 to the MEP. The program will, at a minimum define the goals and objectives of the program based on high priority community-wide issues, identify the target area(s), develop or utilize appropriate educational materials, and determine cost effective and practical methods and procedures.</p>	Met Goal	None
IDD&E	<p style="text-align: center;">4.2.1 Mapping</p> <p>The MS4 members of the LTSTF have developed existing storm sewer maps, which show the locations of municipal storm sewer outfalls, the conveyance system as warranted, and the names and locations of state waters that receive discharges from those outfalls, to assure compliance with the TPDES requirements. The MS4s will continue to update the mapping and assess other strategies to improve this task. Year 1 focused on regional approaches, planning and budgeting.</p>	Met Goal	None
IDD&E	<p style="text-align: center;">4.2.2 Ordinance</p> <p>The LTSTF developed a Model Illicit Discharge Elimination Ordinance for various activities to comply with the TPDES requirements. MS4s that did not have existing ordinances in place adopted the Model Ordinance, whole or in part to comply with the TPDES requirements. Existing ordinances are being reviewed to assure that additional legal authority, if needed, is incorporated into the existing language of the ordinances. Allowable and prohibited discharges will be reviewed. All MS4s will have ordinances in place by Year 3 of the Permit period.</p>	Met Goal	None

IDD&E	<p style="text-align: center;">4.2.3 Business Education</p> <p>The LTSTF continues to work together with its various partners to provide stormwater pollution prevention education materials to the commercial sectors.</p>	Met Goal	None
IDD&E	<p style="text-align: center;">4.2.4 Inspections</p> <p>The LTSTF will continue developing a program to conduct inspections to identify the presence and determine the source of illicit connections and illegal dumping activities. The program will incorporate policy-making, response, inspections, spill response and reporting, auditing and training. The program will include training of building inspectors and other staff. If necessary, the MS4s will entertain privatization of this BMP, in part, or in its entirety. This permit period included planning, training, and budget reviews.</p>	Met Goal	None
IDD&E	<p style="text-align: center;">4.2.5 Business Inspections</p> <p>The LTSTF will continue to develop stormwater criteria to be required of all businesses, and solicit input from existing businesses regarding feasibility and appropriateness of the new criteria. This year, the Task Force focused on outreach and planning.</p>	Met Goal	None
IDD&E	<p style="text-align: center;">4.2.6 HHHW</p> <p>The MS4s will continue to develop a Household Hazardous Waste Outreach Program. The City will seek partnerships with the ISDs and the ACWP to possibly expand the program. Grant opportunities have allowed the Task Force to conduct various regional events. E-waste is also collected.</p>	Met Goal	None
IDD&E	<p style="text-align: center;">4.2.7 Source I&E</p> <p>The program will prioritize risk, provide for reporting as required, and the program 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. The program will allow for notification of illicit discharges outside of its jurisdiction, and will provide for corrective action procedures. An inspection program will be developed. This year the Task Force focused on discussion and planning. This is a Year 3 program.</p>	Met Goal	None
IDD&E	<p style="text-align: center;">4.2.8 Hotline</p> <p>A Stormwater Hotline has been developed and implemented by the majority of the MS4s to report illicit and illegal connections and discharges, illegal dumping, emergency and non-emergency incidents and other stormwater related activities.</p>	Met Goal	None
Construction	<p style="text-align: center;">5.2.0 Assessment of Program</p> <p>Permittees continue to 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. Year 1 focused on planning and budgets.</p>	Met Goal	None

Construction	<p style="text-align: center;">5.2.1 Ordinance</p> <p>Permittees continue to 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. Year 1 focused on planning and budgets.</p>	Met Goal	None
Construction	<p style="text-align: center;">5.2.2 Construction Plan Oversight</p> <p>A construction site stormwater runoff control program was developed and implemented to assure adequate design, implementation, and maintenance of BMPs at construction sites within the MS4s' service areas to reduce pollutant discharges and protect water quality. Oversight, training and outreach are progressing. This year, a regional approach is under assessment. The program will be fully developed by Year 3.</p>	Met Goal	None
Construction	<p style="text-align: center;">5.2.3 Site inspections</p> <p>The LTSTF construction site stormwater runoff control program has an inspection and enforcement component. The MS4s developed or are developing procedures for site inspection and enforcement of control measures. The MS4s will continue to evaluate in house staff and identify resources to implement and improve this BMP. The MS4s are considering privatization of this BMP. The program will be fully developed by Year 3.</p>	Met Goal	None
Construction	<p style="text-align: center;">5.2.4 Training</p> <p>The LTSTF did not develop a contractor certification program, but developed a training program for the TPDES regulated community that included courses, webinars and other events solicited to and attend by contractors, engineers, and other professionals. The LTSTF will continue to develop education requirements, course curricula, continuing education classes, training, and other activities that will assure competent project managers will oversee TPDES regulated activities within construction sites within the MS4s' permitted areas. The LTSTF will continue to work with partnerships to review certification programs within the State. Task Force will begin offering training during Year 2 and fully implement this BMP by Year 3.</p>	Met Goal	None
Construction	<p style="text-align: center;">5.2.5 Construction Waste Management</p> <p>The LTSTF developed requirements for construction site operators to control waste such as discarded building materials, refueling, concrete truck washout, chemicals, litter, and sanitary waste at construction site that may cause adverse impacts to water quality. Task Force will begin offering training during Year 2 and fully implement this BMP by Year 3.</p>	Met Goal	None
Construction	<p style="text-align: center;">5.2.6 Outreach</p> <p>Outreach material describing construction BMPs were developed and delivered as part of the outreach program.</p>	Met Goal	None

<p>Post Construction</p>	<p>6.2.0 Assess Post Construction Program Permittees will 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.</p>	<p>Met Goal</p>	<p>None</p>
<p>Post Construction</p>	<p>6.2.1 Ordinance Pursuant to the new rules, the MS4s will expand the post-construction program to include further review the Model Ordinance, expand the activities of the existing ordinance workgroup to include adoption of this ordinance, and develop an outreach program (new activity). Other ideas will be discussed (innovative methods, incentive program, offsite mitigation, etc.) that can be included in an ordinance to improve its ability to control stormwater runoff. This is a Year 3 BMP, the Task Force is developing discussion, workshops and promoting innovation to assure buy-in from the stakeholders.</p>	<p>Met Goal</p>	<p>None</p>
<p>Post Construction</p>	<p>6.2.2 Drainage Policy The LTSTF reviewed existing drainage design policies and provided recommendations to the MS4s that included provisions for the implementation of proper erosion and sediment controls, plat recordings, post construction BMPs, housekeeping of BMPs, inspections and enforcement, contractual instruments (public and private sector) and waste management as applicable. Additional planning is recommended, more outreach proposed and implementation is tentatively Year 3.</p>	<p>Met Goal</p>	<p>None</p>
<p>Post Construction</p>	<p>6.2.3 BMP Maintenance The LTSTF is developing a model program to establish regular and routine inspections and maintenance procedures for structural post construction BMPs. The program includes a Model Ordinance. The LTSTF will continue to develop this BMP, to incorporate the new rules. This BMP will assure post construction BMPs are in good working order, aesthetically pleasing, and repaired as soon as possible. Full implementation anticipated by Year 3.</p>	<p>Met Goal</p>	<p>None</p>
<p>Post Construction</p>	<p>6.2.4 Land Use The LTSTF developed an awareness program on land use via the land use workgroup of the ACWP. The MS4s will continue to assess stormwater management measures of its existing land use policies and zoning requirements. The revised program will include long-term maintenance of post-construction stormwater control measures that may be included in the Model Ordinance or as a separate instrument. Recording (at the County, etc.) of activities as required by the new permit will be included in this program. Full implementation anticipated by Year 3.</p>	<p>Met Goal</p>	<p>None</p>

Housekeeping	<p style="text-align: center;">7.2.0 Assessment of Housekeeping Programs</p> <p>Permittees assessed program elements that were described in the previous permit, modified as necessary, and developed and implemented new elements, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP.</p>	Met Goal	None
Housekeeping	<p style="text-align: center;">7.2.1 O&M</p> <p>Permittees assessed program elements that were described in the previous permit, modified as necessary, and developed and implemented new elements, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP.</p>	Met Goal	None
Housekeeping	<p style="text-align: center;">7.2.2 Street Sweeping</p> <p>The MS4s improved their street sweeping programs by improving scheduling, purchasing new equipment, retrofitting existing equipment and moreover, continue to evaluate their respective street sweeping programs. Several MS4s do not have street sweeping programs (i.e. small MS4s, non-traditional MS4s), but these MS4s will continue to assess development of programs. Please see Section 13.2.2 for additional activities related to street sweeping as required for Type III and Type IV MS4s.</p>	Met Goal	None
Housekeeping	<p style="text-align: center;">7.2.3 Training</p> <p>The program uses videos, webinars, and similar tools to inform public employees of the impacts associated with illegal discharges and improper disposal of waste from municipal operations.</p>	Met Goal	None
Housekeeping	<p style="text-align: center;">7.2.4 SOPs</p> <p>The LTSTF developed a general standard operation procedure (SOP) manual for municipal operations. The program developed policy, SOPs, and awareness programs that will continue to be evaluated annually. The program will be expanded to include new pollution prevention measures to comply with the new permit. We anticipate full implementation by Year 4.</p>	Met Goal	None
Housekeeping	<p style="text-align: center;">7.2.5 Inspections</p> <p>The MS4s plans to conduct site visits to include visual inspections of various municipal operations to determine the practicality of the SOPs/BMPs and also to provide staff with a better understanding of operations. We anticipate full implementation by Year 3. This year the Task Force focused on training, planning and budgeting.</p>	Met Goal	None
Housekeeping	<p style="text-align: center;">7.2.6 Collection of Waste</p> <p>Dredge spoil, sediment, and floatables collected through the implementation of stormwater sewer system maintenance BMPs will be disposed of properly. Materials collected will be tracked and evaluated. We anticipate full implementation by Year 3. This year the Task Force focused on training, planning and budgeting.</p>	Met Goal	None

<p>Bacteria</p>	<p style="text-align: center;">8.2.1 Source Determination</p> <p>The LTSTF membership will prepare an Impaired Water Body BMP program to meet the requirements of the new MS4 TPDES requirements pursuant to Part II Section D and (b) (i.e. <u>Discharges Directly to Water Quality Impaired Water Bodies without an Approved TMDL</u>) and Part II Section D 4 (a) (5) (i.e. Impairment for Bacteria). The source determination program has not been implemented, a workgroup was developed and is currently meeting actively to achieve this BMP. The Task Force is active with the Arroyo Colorado Watershed Partnership (Bacteria related projects) and various LID demonstration projects. No additional BMPs are proposed at this time.</p>	<p>Partially Met Goal</p>	<p>None</p>
<p>Bacteria</p>	<p style="text-align: center;">8.2.2 Impairment Program</p> <p>A workgroup was developed and is currently meeting actively to achieve this BMP. The Task Force is active with the Arroyo Colorado Watershed Partnership (Bacteria related projects) and various LID demonstration projects. No additional BMPs are proposed at this time. This is a Year 3 BMP; the Task Force is focusing on planning.</p>	<p>Met Goal</p>	<p>None</p>
<p>Bacteria</p>	<p style="text-align: center;">8.2.3 Workgroup</p> <p>A workgroup was developed and is currently meeting actively to achieve this BMP. The Task Force is active with the Arroyo Colorado Watershed Partnership (Bacteria related projects) and various LID demonstration projects. No additional BMPs are proposed at this time. This is a Year 3 BMP; the Task Force is focusing on planning.</p>	<p>Met Goal</p>	<p>None</p>
<p>Bacteria</p>	<p style="text-align: center;">8.2.3 Reporting</p> <p>Annual reporting.</p>	<p>Met Goal</p>	<p>None</p>

Table 3.0 – Measurable Goals Status (Type II, III, IV and non-traditional MS4s)

MCM(s)	Level	Measurable Goal(s)	Success Met Goals in Year 1 of Permit Period 2 unless otherwise noted.	Proposed Changes (submit NOC as needed)
IDD&E	II, III and IV	10.2.1 OSSF Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP. This is a Year 3 BMP.	Met Goal and ongoing. Additional reporting after this permit year.	None
IDD&E	IV	10.2.2 Identify Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP. This is a Year 3 BMP.	Met Goal and ongoing. Additional reporting after this permit year.	None
IDD&E	IV	10.2.3 Field Screening Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP. This is a Year 3 BMP.	Met Goal and ongoing. Additional reporting after this permit year.	None
IDD&E	N	10.2.4 Notification Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP. This is a Year 3 BMP.	Met Goal and ongoing. Additional reporting after this permit year.	None
IDD&E	III, IV	10.2.5 Source Elimination Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP. This is a Year 3 BMP.	Met Goal and ongoing. Additional reporting after this permit year.	None
Construction	III, IV	11.2.1 Inventory Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP. This is a Year 3 BMP.	Met goal	None
Post Construction	IV	12.2.1 Inspection Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP. Full implementation is by Year 3.	Met goal	None

Housekeeping	III, IV	13.2.1 Storm O&M Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP. Full implementation is by Year 3.	Met goal	None
Housekeeping	III, IV	13.2.2 Roadway O&M Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP. Full implementation is by Year 3.	Met goal	None
Housekeeping	III, IV	13.2.3 Mapping Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP. Full implementation is by Year 3.	Met goal	None
Housekeeping	III, IV	13.2.4 SOPs Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP. Full implementation is by Year 3.	Met goal	None
Housekeeping	III, IV	13.2.5 High Priority Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP. Full implementation is by Year 3.	Met goal	None
Housekeeping	III, IV	13.2.6 Inspections Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP. Full implementation is by Year 3.	Met goal	None
Housekeeping	IV	13.2.7 Pesticides Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP. Full implementation is by Year 3.	Met goal	None
Industrial	IV	13.2.7 Inspections Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP. Full implementation is by Year 3.	Partially Met goal	None

