

City of Seabrook
Storm Water Management Program
Phase II MS4 Permit No. TXR040000

City of Seabrook; Level 2 MS4

Seabrook, TX 77586

(281) 291-5600

09-05-2018

1.0 Public Education, Outreach and Involvement

The Public Education and Outreach minimum measure consists of Best Management Practices (BMPs) that focus on the development of educational materials designed to inform the public about the impacts that storm water discharges have on local water bodies and the steps that the public can take to reduce pollutants in storm water runoff. The BMPs describe how individuals and households will be informed about the steps they can take to reduce storm water pollution; how individuals and groups will be informed on how to become involved in the storm water program; and the mechanisms that will be used to reach target audiences. The target audiences for the education program are specified in education-related BMPs described in the other minimum control measures. The target audiences were selected based on regulation requirements and based on the goal of educating the community about the impacts that storm water discharges have on local water bodies and the steps that the public can take to reduce pollutants in storm water runoff. The Public Education and Outreach program and BMPs, in combination, are expected to reach all of the constituents within the MS4's permitted boundary. The target pollutant sources are construction site runoff, impacts from new and re-development, illicit discharges and other pollutant sources as identified to be of local concern, ie. approved TMDL parameters. Evaluation of the success of this minimum measure will be through careful analysis of the measurable goals for each BMP included in this minimum measure. Measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. The responsibility for implementation of this minimum measure is described with each BMP procedure.

Best Management Practices:

1. (PE-1) Water Utility Bill Message: Continue to distribute water utility bill message designed to direct the public to a website with information on storm water pollution prevention activities.

Implementation Tasks:

1. Mail water utility bill message directing public to website with information on :- Citizen reporting under the illicit discharge and construction programs- Water quality impacts of storm water runoff to local water bodies- Steps the public can take to reduce storm water pollution- Public Involvement Programs.
2. Update utility bill message with website address.
3. Distribute utility bill message with utility bills as scheduled.

Measurable Goals:

- 2019 (Year 1): Review/Update/Distribute utility bill message to **100%** of customers. Provide 5 examples of the message sent with annual report.
- 2020 (Year 2): Review/Update/Distribute utility bill message to **100%** of customers. Provide 5 examples of the message sent with annual report.
- 2021 (Year 3): Review/Update/Distribute utility bill message to **100%** of customers. Provide 5 examples of the message sent with annual report.
- 2022 (Year 4): Review/Update/Distribute utility bill message to **100%** of customers. Provide 5 examples of the message sent with annual report.
- 2023 (Year 5): Review/Update/Distribute utility bill message to **100%** of customers. Provide 5 examples of the message sent with annual report.

Responsible Party:

Public Works

- 2. (PE-2) Flyers and Brochures: Development of Flyers for educating the public on storm water quality issues.

Implementation Tasks:

1. Review the list of subjects for inclusion and discussion in the flyers based on the consideration of the following subjects: - Citizen reporting under the illicit discharge and construction programs- Water quality impacts of storm water runoff to local water bodies- Steps the public can take to reduce storm water pollution- Public involvement programs- **Pet waste**
2. Review, design and print flyers for each of the selected subjects.
3. Develop/ Review/Update a list of appropriate locations for flyer postings and acquire permission from location owners for posting, if necessary.
4. Develop/Update/Review a flyer-posting schedule that is consistent with the implementation schedule of other BMP's included in the SWMP.
5. Post flyers at selected locations in accordance with the identified schedule.

Measurable Goals:

- 2019 (Year 1): Develop/Review/Update subjects and provide **100** flyers throughout public locations. Provide the number of flyers placed and numbers picked up by public within the annual report.
- 2020 (Year 2): Develop/Review/Update subjects and review number of previous year's flyer use. Provide **5%** more or less than the previous year's pickup numbers. Provide the number of flyers placed and numbers picked up by public within the annual report.
- 2021 (Year 3): Develop/Review/Update subjects and review number of previous year's flyer use. Provide **5%** more or less than the previous year's pickup numbers. Provide the number of flyers placed and numbers picked up by public within the annual report.
- 2022 (Year 4): Develop/Review/Update subjects and review number of previous year's flyer use. Provide **5%** more or less than the previous year's pickup numbers. Provide the number of flyers placed and numbers picked up by public within the annual report.
- 2023 (Year 5): Develop/Review/Update subjects and review number of previous year's flyer use. Provide **5%** more or less than the previous year's pickup numbers. Provide the number of flyers placed and numbers picked up by public within the annual report.

Responsible Party:

Public Works

3. (PE-3) Storm Water Website: Review, update, publish and maintain a website that informs the public about the impacts of storm water pollution and related pollution prevention activities the public can take.

Website address: <https://www.seabrooktx.gov/239/Streets-Traffic>

Implementation Tasks:

1. Develop/Update/Review a list of subjects for inclusion and discussion in the website based on consideration of the following subjects:- Citizen reporting under the illicit discharge and construction programs- Water quality impacts of storm water runoff to local water bodies- Steps the public can take to reduce storm water pollution- Public involvement programs- Pet waste.
2. Update and publish the website to the internet for public access.
3. Post new information to the website in accordance with the identified schedule.

Measurable Goals:

- 2019 (Year 1): Develop/Update/Review **two** subjects for website placement. Provide screen shots of the website information within the annual report.
- 2020 (Year 2): Develop/Update/Review **two** subjects for website placement. Provide screen shots of the website information within the annual report.
- 2021 (Year 3): Develop/Update/Review **two** subjects for website placement. Provide screen shots of the website information within the annual report.
- 2022 (Year 4): Develop/Update/Review **two** subjects for website placement. Provide screen shots of the website information within the annual report.
- 2023 (Year 5): Develop/Update/Review **two** subjects for website placement. Provide screen shots of the website information within the annual report.

Responsible Party:

Public Works

4. (PE-4) Public Service Announcements: Development and broadcasting of public service announcements (PSA's) that focus on the impacts of storm water runoff on local water bodies and steps the public can take to reduce storm water pollution.

Implementation Tasks:

1. Review, update and develop a list of storm water issues based on BMP's selected in the SWMP.
2. Identify issues to be included in the PSA's.
3. Develop/Update/Review PSA's on the selected subjects.
4. Contact local television and radio media for information on broadcasting of PSA's.
5. Broadcast PSA's as local media and radio schedules permit.

Measurable Goals:

2019 (Year 1): Review, update and develop appropriate issues to be included in the public service announcements. Provide/Place/Broadcast at least **five** announcements throughout the year. Provide the number of announcements and locations within the annual report.

2020 (Year 2): Review, update and develop appropriate issues to be included in the public service announcements. Provide/Place/Broadcast at least **five** announcements throughout the year. Provide the number of announcements and locations within the annual report.

2021 (Year 3): Review, update and develop appropriate issues to be included in the public service announcements. Provide/Place/Broadcast at least **five** announcements throughout the year. Provide the number of announcements and locations within the annual report.

2022 (Year 4): Review, update and develop appropriate issues to be included in the public service announcements. Provide/Place/Broadcast at least **five** announcements throughout the year. Provide the number of announcements and locations within the annual report.

2023 (Year 5): Review, update and develop appropriate issues to be included in the public service announcements. Provide/Place/Broadcast at least **five** announcements throughout the year. Provide the number of announcements and locations within the annual report.

Responsible Party:

Public Works

5. (PE-5) Classroom Education on Storm Water: Development and distribution of educational materials to school age children in order to foster an early age respect for the environment.

Implementation Tasks:

1. Develop/Update/Review age appropriate materials for distribution to local school students.
2. Determine quantities of materials necessary to distribute to local schools.
3. Distribute educational materials to local schools.
4. Update education materials as necessary to maintain consistency with current standards and to reflect input from school administrators and teachers.

Measurable Goals:

2019 (Year 1): Develop/Update educational materials. Provide educational materials to at least **50** students. Provide material used and number of students reached within the annual report.

2020 (Year 2): Develop/Update educational materials. Provide educational materials to at least **50** students. Provide material used and number of students reached within the annual report.

2021 (Year 3): Develop/Update educational materials. Provide educational materials to at least **50** students. Provide material used and number of students reached within the annual report.

2022 (Year 4): Develop/Update educational materials. Provide educational materials to at least **50** students. Provide material used and number of students reached within the annual report.

2023 (Year 5): Develop/Update educational materials. Provide educational materials to at least 50 students. Provide material used and number of students reached within the annual report.

Responsible Party:

Public Works

6. (PE-6) Public Education on Construction Activities and New Development Activities: Development and distribution of public education materials that focus on the impacts of construction site runoff and steps the public can take to report the occurrence of potential construction related storm water quality problems.

Implementation Tasks:

1. Develop/Update and distribute public education materials that focus on the following construction related items:- Local construction storm water regulations- Methods for the public to report potentially out of compliance construction activities- Impacts of uncontrolled construction site runoff to local water bodies and the MS4.
2. Design and publish construction/new development public education.

Measurable Goals:

- 2019 (Year 1): Develop/Review/Update subjects and provide 100 flyers throughout public locations. Provide the number of flyers placed and numbers picked up by public within the annual report.
- 2020 (Year 2): Develop/Review/Update subjects and review number of previous year's flyer use. Provide 5% more or less than the previous year's pickup numbers. Provide the number of flyers placed and numbers picked up by public within the annual report.
- 2021 (Year 3): Develop/Review/Update subjects and review number of previous year's flyer use. Provide 5% more or less than the previous year's pickup numbers. Provide the number of flyers placed and numbers picked up by public within the annual report.
- 2022 (Year 4): Develop/Review/Update subjects and review number of previous year's flyer use. Provide 5% more or less than the previous year's pickup numbers. Provide the number of flyers placed and numbers picked up by public within the annual report.
- 2023 (Year 5): Develop/Review/Update subjects and review number of previous year's flyer use. Provide 5% more or less than the previous year's pickup numbers. Provide the number of flyers placed and numbers picked up by public within the annual report.

Responsible Party:

Public Works

1.1 Public Involvement / Participation

The Public Involvement/Participation minimum measure consists of Best Management Practices (BMPs) that focus on involving the local public in development and implementation of the SWMP. Compliance with State, Tribal, and local public notice requirements will facilitate involvement of the public in development, submittal (NOI and SWMP), and implementation of the public involvement/participation program. The BMPs describe the plan to actively involve the public in development and implementation of the SWMP and the types of public involvement activities included in the program. The target audiences for the public involvement program are all groups that may have an interest in the particular BMPs in addition to all ethnic and economic groups and the general public located within the permitted boundary. Evaluation of the success of this minimum measure will be through careful analysis of the

measurable goals for each BMP included in this minimum measure. Measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. The responsibility for implementation of this minimum measure is described with each BMP procedure.

Best Management Practices:

1. (PI-1) Adopt-A-Street Program: Volunteer cleanup of streets or street segments.

Implementation Tasks:

1. Adopt Lakeside Drive within Lake Cove subdivision from NASA Parkway north for 500 feet to include in the Adopt-A-Streets program.
2. Continue to identify local public organizations or businesses that may be interested in participation in the program.
3. Develop/Update guidelines and schedules for Adopt-A-Street cleaning events.
4. Invite identified groups to participate in the Adopt-A-Street program.
5. Form adoption agreements with groups willing to participate in the program.
6. Provide necessary support to the volunteer groups for cleaning and/or maintenance events, e.g. traffic control, safety equipment, trash bags, and landfill access or bulk litter pickup.

Measurable Goals:

2019 (Year 1): Research/Develop/Promote volunteer cleanup programs and hold at least **one** event per year. Provide the number of events held, number of volunteers and location of event within annual report.

2020 (Year 2): Research/Develop/Promote volunteer cleanup programs and hold at least **one** event per year. Provide the number of events held, number of volunteers and location of event within annual report.

2021 (Year 3): Research/Develop/Promote volunteer cleanup programs and hold at least **one** event per year. Provide the number of events held, number of volunteers and location of event within annual report.

2022 (Year 4): Research/Develop/Promote volunteer cleanup programs and hold at least **one** event per year. Provide the number of events held, number of volunteers and location of event within annual report.

2023 (Year 5): Research/Develop/Promote volunteer cleanup programs and hold at least **one** event per year. Provide the number of events held, number of volunteers and location of event within annual report.

Responsible Party:

Public Works

2. (PI-2) Storm Drain Stenciling: Stenciling of storm water inlet structures with messages related to storm water quality issues.

Implementation Tasks:

1. Continue to identify target areas or streets to be included in the storm drain-stenciling program.
2. Continue to identify groups that may be willing to participate in the storm drain-stenciling

program including consideration of the following groups: - Local boy and Girl Scout organizations- Local school groups- Local fund raising groups- Other civic organizations.

3. Develop/Update slogans, logos, and/or text for stenciling storm water inlet structures.
4. Invite targeted groups to participate in the storm drain-stenciling program.
5. Provide necessary support for volunteer storm drain stenciling groups, e.g. stencils, appliques, paint, rollers, traffic control, safety equipment, trash bags, and landfill access or bulk litter collection.

Measurable Goals:

- 2019 (Year 1): Identify area\street needing stenciling (or re-stenciling) and perform at least **30** installs. Provide locations, groups, and number completed within annual report.
- 2020 (Year 2): Identify area\street needing stenciling (or re-stenciling) and perform at least **30** of them. Provide locations, groups, and number completed within annual report.
- 2021 (Year 3): Identify area\street needing stenciling (or re-stenciling) and perform at least **30** of them. Provide locations, groups, and number completed within annual report.
- 2022 (Year 4): Identify area\street needing stenciling (or re-stenciling) and perform at least **30** of them. Provide locations, groups, and number completed within annual report.
- 2023 (Year 5): Identify area\street needing stenciling (or re-stenciling) and perform at least **30** of them. Provide locations, groups, and number completed within annual report.

Responsible Party:

Public Works

3. **(PI-3)** Community Hotlines: Develop/Update and publicize a community hotline or website reporting forum for the public to report storm water quality problems.

Implementation Tasks:

1. Update and identify phone number(s) and contact person(s) that should receive reports from the public on storm water quality issues.
2. Update list of storm water quality problems that could be reported by the public through the community hotlines.

Measurable Goals:

- 2019 (Year 1): Review/Update community hotline or website contact information and forms. Annual address **90%** of the reported issues. Provide number of issues received and number of issues address within the annual report.
- 2020 (Year 2): Review/Update community hotline or website contact information and forms. Annual address **90%** of the reported issues. Provide number of issues received and number of issues address within the annual report.
- 2021 (Year 3): Review/Update community hotline or website contact information and forms. Annual address **90%** of the reported issues. Provide number of issues received and number of issues address within the annual report.
- 2022 (Year 4): Review/Update community hotline or website contact information and forms. Annual address **90%** of the reported issues. Provide number of issues received and number of issues address within the annual report.
- 2023 (Year 5): Review/Update community hotline or website contact information and forms. Annual address **90%** of the reported issues. Provide number of issues received

and number of issues address within the annual report.

Responsible Party:

Public Works

2.0 Illicit Discharge Detection and Elimination

The Illicit Discharge Detection and Elimination minimum measure consists of Best Management Practices (BMPs) that focus on the detection and elimination of illicit discharges into the MS4. A storm sewer system map showing the location of all outfalls and the names and location of all receiving waters will be developed from existing mapping information, eg. MS4 CAD or GIS map bases or the US Census Bureau Tiger/Line 2000 maps. The BMPs describe map update procedures; the legal authority mechanism (to the extent allowable under State, Tribal or local law) which will be used to effectively prohibit illicit discharges; enforcement procedures and actions to ensure that the regulatory mechanism is implemented; the dry weather screening program and procedures for tracing and locating the source of an illicit discharge; procedures for locating priority areas; and procedures for removing the source of the illicit discharge. BMPs focusing on education and training of public employees, businesses, and the general public with regard to the hazards associated with illegal discharges and improper disposal of waste are described in the Public Education minimum measure. Evaluation of the success of this minimum measure will be through careful analysis of the measurable goals for each BMP included in this minimum measure. Measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. The responsibility for implementation of this minimum measure is described with each BMP procedure.

Outfall inspections and public reporting will be key in locating and tracing illicit discharges and illegal dumping using visual, odor and chemical analysis of dry weather discharges upstream back to the source. Investigations shall begin immediately once a complaint is received of a potential illicit discharge. For identified illicit discharges, ordinance enforcement will be the backbone of removing the discharge. If the discharge is an immediate threat to human health and safety or the environment the utilities shall be shut off and TCEQ immediately notified.

Best Management Practices:

1. (ID-1) Illicit Discharge Legal Authority: Develop/Update adequate legal authority to prohibit illicit discharges of non-storm water to the MS4.

Implementation Tasks:

1. Research the existing laws, ordinances, and other legal powers that prohibit specific types of illicit discharges.
2. If necessary, Develop/Update supplemental legal authority that prohibits all new illicit discharges of non-storm water to the MS4.
3. Educate the public and the commercial community on the prohibition of non-storm water discharges to the MS4.
4. Identify illicit discharges to the MS4 through the MS4 outfall screening programs.
5. Develop/Update educational materials for distribution to the public on reporting mechanisms for potential illicit discharges.
6. Maintain records of each illicit discharge identified and the corresponding corrective actions

taken to eliminate the illicit discharge.

Measurable Goals:

- 2019 (Year 1): Research at least **2** other Cities existing laws, ordinances, or other legal powers that prohibit specific types of illicit discharges. Provide Cities used for research within the annual report.
- 2020 (Year 2): Develop/Modify/Update ordinances to keep current with any changing requirement/standards. Provide changes within the annual report if there are any.
- 2021 (Year 3): Enforce **100%** of laws, ordinances, and other legal powers that prohibit specific types of illicit discharges. Provide number of violations identified and enforced within annual report.
- 2022 (Year 4): Enforce **100%** of laws, ordinances, and other legal powers that prohibit specific types of illicit discharges. Provide number of violations identified and enforced within annual report.
- 2023 (Year 5): Enforce **100%** of laws, ordinances, and other legal powers that prohibit specific types of illicit discharges. Provide number of violations identified and enforced within annual report.

Responsible Party:

Building Department

- 2. **(ID-2)** Maintain the MS4 and Outfall Inventory: Continue to update the current map of the MS4 indicating the location of new storm water discharge outfalls.

Implementation Tasks:

1. Continue to update the developed map of the MS4 system.
2. Identify new outfalls and drainage structures during the review of development and construction plans.
3. Develop/Update a method for updating the MS4 map with new drainage structures and outfalls.
4. Develop/Update procedures for including new outfalls found in the field while conducting the MS4 outfall screening programs.
5. Train MS4 screening personnel and plan review personnel on proper procedures for updating the MS4 map and outfall inventory.

Measurable Goals:

- 2019 (Year 1): Identify/Update **100%** of new or replaced outfalls and drainage structures during the construction of development and CIP projects. Provide map of updated system within the annual report.
- 2020 (Year 2): Identify/Update **100%** of new or replaced outfalls and drainage structures during the construction of development and CIP projects. Provide map of updated system within the annual report.
- 2021 (Year 3): Identify/Update **100%** of new or replaced outfalls and drainage structures during the construction of development and CIP projects. Provide map of updated system within the annual report.
- 2022 (Year 4): Identify/Update **100%** of new or replaced outfalls and drainage structures during the construction of development and CIP projects. Provide map of updated system within the annual report.

system within the annual report.

2023 (Year 5): Identify/Update **100%** of new or replaced outfalls and drainage structures during the construction of development and CIP projects. Provide map of updated system within the annual report.

Responsible Party:

Public Works

3. **(ID-3)** MS4 Outfall Screening: Conduct systematic inspection of outfalls in the MS4 in order to identify the presence of illicit discharges.

Implementation Tasks:

1. Review and modify if needed the outfall screening forms and procedures for record keeping and data entry into MS4 outfall screening databases.
2. Train personnel in field analytical techniques necessary for the identification of illicit discharges.
3. Continue to track locations of illicit discharges upon identification (MS4 Database).
4. Develop/Update a schedule that allows for the screening of the entire MS4 system within the permit term. (Typically the schedule will require 20% of the total number of outfalls be completed annually in order to achieve 100% completion over a 5 year permit term.)
5. Conduct outfall screening efforts according to the developed schedule.
6. Investigate outfall drainage systems that are identified as having non-storm water discharges from the MS4 and eliminate illicit discharges according to local storm water regulations.
7. Maintain records of outfall screening and investigations for each outfall and any elimination activities.

Measurable Goals:

2019 (Year 1): Complete screening of **20%** of the storm water outfalls that discharge to the MS4 in accordance with the identified schedule. Provide number of outfalls inspected and results within the annual report.

2020 (Year 2): Complete screening of **40%** of the storm water outfalls that discharge to the MS4 in accordance with the identified schedule. Provide number of outfalls inspected and results within the annual report.

2021 (Year 3): Complete screening of **60%** of the storm water outfalls that discharge to the MS4 in accordance with the identified schedule. Provide number of outfalls inspected and results within the annual report.

2022 (Year 4): Complete screening of **80%** of the storm water outfalls that discharge to the MS4 in accordance with the identified schedule. Provide number of outfalls inspected and results within the annual report.

2023 (Year 5): Complete screening of **100%** of the storm water outfalls that discharge to the MS4 in accordance with the identified schedule. Provide number of outfalls inspected and results within the annual report.

Responsible Party:

Public Works

4. (ID-4) Storm Water Hot Spots: Identification and inspection of commercial or industrial facilities that have a high probability of discharging pollutants to the MS4 and education of facility personnel.

Implementation Tasks:

1. Identify the types of facilities that may be likely to contribute illicit discharges to the MS4 including the consideration of the following: - Auto salvage locations- Foundries- Other facilities
2. Develop/Update a list of potential pollutants of concern for each type of facility.
3. Develop/Update a local inventory of these types of facilities including the following: - Name of the facility- Location of the facility (address or coordinates) - Owner information.
4. Contact state and federal regulatory agencies and local Phase I communities to determine if storm water quality public education materials may be available for distribution to these types of facilities.

Measurable Goals:

- 2019 (Year 1): Develop/Update inventory of high potential sites and provide education materials to **100%** of the sites. Provide inventory list with annual report.
- 2020 (Year 2): Develop/Update inventory of high potential sites and provide education materials to **100%** of the sites. Provide inventory list with annual report.
- 2021 (Year 3): Develop/Update inventory of high potential sites and provide education materials to **100%** of the sites. Provide inventory list with annual report.
- 2022 (Year 4): Develop/Update inventory of high potential sites and provide education materials to **100%** of the sites. Provide inventory list with annual report.
- 2023 (Year 5): Develop/Update inventory of high potential sites and provide education materials to **100%** of the sites. Provide inventory list with annual report.

Responsible Party:

Public Works

5. (ID-5) Illicit Discharge Employee Training: Educate permittee personnel on the identification of illicit discharges; procedures for reporting, responding and removing illicit discharges and illegal dumping to outfall inspection personnel.

Implementation Tasks:

1. Develop/Update training materials and reporting procedures on illicit discharges.

Measurable Goals:

- 2019 (Year 1): Identify personnel to be educated on the identification and reporting of illicit discharges; train **100%** of them within the year. Provide sign-in sheets and topics covered within the annual report.
- 2020 (Year 2): Develop procedures on reporting, responding and removing illegal discharges and dumping. Identify personnel to be educated on the identification and reporting of illicit discharges; train **100%** of them within the year. Provide sign-in sheets and topics covered within the annual report. Provide the procedures within annual report.
- 2021 (Year 3): Update (if needed) procedures on reporting, responding and removing illegal discharges and dumping. Identify personnel to be educated on the identification

and reporting of illicit discharges; train **100%** of them within the year. Provide sign-in sheets and topics covered within the annual report. Provide the procedures within annual report.

2022 (Year 4): Update (if needed) procedures on reporting, responding and removing illegal discharges and dumping. Identify personnel to be educated on the identification and reporting of illicit discharges; train **100%** of them within the year. Provide sign-in sheets and topics covered within the annual report. Provide the procedures within annual report.

2023 (Year 5): Update (if needed) procedures on reporting, responding and removing illegal discharges and dumping. Identify personnel to be educated on the identification and reporting of illicit discharges; train **100%** of them within the year. Provide sign-in sheets and topics covered within the annual report. Provide the procedures within annual report.

Responsible Party:

Public Works

6. **(ID-6)** Elimination of Septic System and Gray Water Discharges: Identify and eliminate illicit discharges from septic systems or gray water lines.

Implementation Tasks:

1. Review the list of locations or areas known to have septic systems that could potentially discharge to the MS4.
2. Research economical options for owners to eliminate illicit septic system discharges to the MS4 including consideration of the following:- Installation of approved on-site sewer treatment systems- Owner connection to local sanitary sewer system- Regional or localized capital improvement projects that expand sewer collection to areas served by malfunctioning septic systems.
3. Train MS4 inspection and outfall screening personnel on the identification of septic system discharge locations and internal tracking and reporting mechanisms.
4. Coordinate the identification of septic system and/or gray water discharges with the MS4 outfall screening program.
5. Require property owner elimination of septic system and/or gray water discharges according local storm water regulations.

Measurable Goals:

2019 (Year 1): Train **100%** street department staff on illicit discharge detection. MS4 Outfall Dry Weather inspections will also detect illicit sanitary sewer discharges. Provide sign-in sheet of personnel trained, references to identified sewer discharges from dry weather outfall inspections and **100%** enforcement actions taken to eliminate the illicit septic discharges within the annual report.

2020 (Year 2) Train **100%** street department staff on illicit discharge detection. MS4 Outfall Dry Weather inspections will also detect illicit sanitary sewer discharges. Provide sign-in sheet of personnel trained, references to identified sewer discharges from dry weather outfall inspections and **100%** enforcement actions taken to eliminate the illicit septic discharges within the annual report.

2021 (Year 3): Train **100%** street department staff on illicit discharge detection. MS4 Outfall Dry Weather inspections will also detect illicit sanitary sewer discharges. Provide

sign-in sheet of personal trained, references to identified sewer discharges from dry weather outfall inspections and **100%** enforcement actions taken to eliminate the illicit septic discharges within the annual report.

2022 (Year 4): Train **100%** street department staff on illicit discharge detection. MS4 Outfall Dry Weather inspections will also detect illicit sanitary sewer discharges. Provide sign-in sheet of personal trained, references to identified sewer discharges from dry weather outfall inspections and **100%** enforcement actions taken to eliminate the illicit septic discharges within the annual report.

2023 (Year 5): Train **100%** street department staff on illicit discharge detection. MS4 Outfall Dry Weather inspections will also detect illicit sanitary sewer discharges. Provide sign-in sheet of personal trained, references to identified sewer discharges from dry weather outfall inspections and **100%** enforcement actions taken to eliminate the illicit septic discharges within the annual report.

Responsible Party:

Public Works

7. **(ID-7)** Sanitary Sewer Leak Elimination: Identification and scheduled elimination of sanitary sewer leaks or connections to the MS4 through small and large capital improvement projects.

Implementation Tasks:

1. Maintain a sanitary sewer system map of the area within the regulated MS4 boundary.
2. Train inspection and outfall screening personnel on the identification, tracking, and reporting of sanitary sewer system leaks.
3. Coordinate the identification of sanitary sewer system leaks with the MS4 screening and inspection program.
4. Develop/Update internal procedures for tracing sanitary sewer leaks including consideration of the following:- Smoke testing of sanitary sewer lines- Dye testing of sanitary sewer lines- Video inspection of sanitary sewer lines- Manhole to manhole investigation procedures
5. Conduct necessary sewer system repairs to eliminate sanitary sewer leaks that discharge to the MS4.

Measurable Goals:

2019 (Year 1): Update/Maintain **100%** of the sanitary sewer system map of the area within the regulated MS4 boundary. Train **100%** of the inspection and outfall screening personnel on identification, tracking and reporting of sanitary sewer system leaks. Conduct sewer system repairs to eliminate **100%** of identified sanitary sewer leaks discharging to the MS4. Provide map, sign-in sheet, and number of repairs within the annual report.

2020 (Year 2): Update/Maintain **100%** of the sanitary sewer system map of the area within the regulated MS4 boundary. Train **100%** of the inspection and outfall screening personnel on identification, tracking and reporting of sanitary sewer system leaks. Conduct sewer system repairs to eliminate **100%** of identified sanitary sewer leaks discharging to the MS4. Provide map, sign-in sheet, and number of repairs within the annual report.

2021 (Year 3): Update/Maintain **100%** of the sanitary sewer system map of the area within the regulated MS4 boundary. Train **100%** of the inspection and outfall screening

personnel on identification, tracking and reporting of sanitary sewer system leaks. Conduct sewer system repairs to eliminate **100%** of identified sanitary sewer leaks discharging to the MS4. Provide map, sign-in sheet, and number of repairs within the annual report.

2022 (Year 4): Update/Maintain **100%** of the sanitary sewer system map of the area within the regulated MS4 boundary. Train **100%** of the inspection and outfall screening personnel on identification, tracking and reporting of sanitary sewer system leaks. Conduct sewer system repairs to eliminate **100%** of identified sanitary sewer leaks discharging to the MS4. Provide map, sign-in sheet, and number of repairs within the annual report.

2023 (Year 5): Update/Maintain **100%** of the sanitary sewer system map of the area within the regulated MS4 boundary. Train **100%** of the inspection and outfall screening personnel on identification, tracking and reporting of sanitary sewer system leaks. Conduct sewer system repairs to eliminate **100%** of identified sanitary sewer leaks discharging to the MS4. Provide map, sign-in sheet, and number of repairs within the annual report.

Responsible Party:

Public Works

8. **(ID-8)** Sanitary Sewer System Overflows: Identify and reduce the occurrences of sanitary sewer system overflows.

Implementation Tasks:

1. Develop/Update and maintain a sanitary sewer system map of the area within the regulated MS4 boundary.
2. Develop/Update procedures for the investigation, identification, and reporting of sanitary sewer system overflows.
3. Develop/Update and distribute public education materials on the reporting of sanitary sewer system overflows.
4. Investigate locations of reported sanitary sewer system overflows reported by the public.
5. Properly document and report the location and characteristics of each sanitary sewer system overflow detected to the appropriate regulatory agency (if applicable).
6. Determine steps necessary to eliminate each sanitary sewer system overflow identified.
7. Conduct sewer system studies necessary to determine appropriate elimination project(s), schedule(s), and budget(s).
8. Develop/Update a master plan schedule for projects designed to eliminate sanitary sewer system overflows.
9. Complete planned projects according to schedule and budget.

Measurable Goals:

2019 (Year 1): Review/Update **100%** of procedures for the investigation, identification, and report of sanitary sewer system overflows. Review/Update **100%** of the sanitary sewer system map within the MS4. Conduct at least **one** sewer system study to

determine appropriate elimination project, schedule, and budget for the year. Investigate **100%** of the publicly reported overflows. Develop/Update a rehab schedule with the CIP for projects designed to eliminate sanitary sewer overflows. Provide sewer system map, all system repairs/upgrades (if performed) and existing/new CIP projects related to sewer overflow prevention within the annual report.

2020 (Year 2): Review/Update **100%** of procedures for the investigation, identification, and report of sanitary sewer system overflows. Review/Update **100%** of the sanitary sewer system map within the MS4. Conduct at least **one** sewer system study to determine appropriate elimination project, schedule, and budget for the year. Investigate **100%** of the publicly reported overflows. Develop/Update a rehab schedule with the CIP for projects designed to eliminate sanitary sewer overflows. Provide sewer system map, all system repairs/upgrades (if performed) and existing/new CIP projects related to sewer overflow prevention within the annual report.

2021 (Year 3): Review/Update **100%** of procedures for the investigation, identification, and report of sanitary sewer system overflows. Review/Update **100%** of the sanitary sewer system map within the MS4. Conduct at least **one** sewer system study to determine appropriate elimination project, schedule, and budget for the year. Investigate **100%** of the publicly reported overflows. Develop/Update a rehab schedule with the CIP for projects designed to eliminate sanitary sewer overflows. Provide sewer system map, all system repairs/upgrades (if performed) and existing/new CIP projects related to sewer overflow prevention within the annual report.

2022 (Year 4): Review/Update **100%** of procedures for the investigation, identification, and report of sanitary sewer system overflows. Review/Update **100%** of the sanitary sewer system map within the MS4. Conduct at least **one** sewer system study to determine appropriate elimination project, schedule, and budget for the year. Investigate **100%** of the publicly reported overflows. Develop/Update a rehab schedule with the CIP for projects designed to eliminate sanitary sewer overflows. Provide sewer system map, all system repairs/upgrades (if performed) and existing/new CIP projects related to sewer overflow prevention within the annual report.

2023 (Year 5): Review/Update **100%** of procedures for the investigation, identification, and report of sanitary sewer system overflows. Review/Update **100%** of the sanitary sewer system map within the MS4. Conduct at least **one** sewer system study to determine appropriate elimination project, schedule, and budget for the year. Investigate **100%** of the publicly reported overflows. Develop/Update a rehab schedule with the CIP for projects designed to eliminate sanitary sewer overflows. Provide sewer system map, all system repairs/upgrades (if performed) and existing/new CIP projects related to sewer overflow prevention within the annual report.

Responsible Party:

Public Works

3.0 Construction Site Storm Water Runoff Control

The Construction Site Runoff minimum measure consists of Best Management Practices (BMP's) that focus on the reduction of pollutants in any storm water runoff to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of storm water discharges from construction activity disturbing less than one acre will be considered if it is part of a larger common plan of development or sale that would disturb one acre or more. The BMPs describe the legal authority

mechanism (to the extent allowable under State, Tribal or local law) which will be used to require erosion and sediment controls; enforcement procedures and actions to ensure compliance; requirements for construction site operators to implement appropriate erosion and sediment control BMPs; requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter and sanitary waste at the construction site; procedures for site plan review which incorporate the consideration of potential water quality impacts; procedures for receipt and consideration of information submitted by the public; and procedures for site inspection and enforcement of control measures. Evaluation of the success of this minimum measure will be through careful analysis of the measurable goals for each BMP included in this minimum measure. Measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. The responsibility for implementation of this minimum measure is described with each BMP procedure.

Best Management Practices:

1. **(CS-1)** Construction Legal Authority: Develop/Update adequate legal authority to regulate local construction site runoff through construction permitting programs.

Implementation Tasks:

1. Review/Modify guidelines and regulatory issues necessary to control storm water runoff from construction sites under the following:- Require SWP3 for Construction Activities- Temporary erosion control measures- Control of other construction wastes- Operation and general prohibitions- Final stabilization of the site- Local permitting requirements- Record keeping and locally required submissions
2. Review/Modify supplemental legal authority, through ordinance, order, or other policy related powers, to regulate construction site runoff.
3. Provide notification to the local construction community of the updated local construction storm water regulations.
4. Enforce the regulations as appropriate to regulate storm water discharges from local construction sites.

Measurable Goals:

- 2019 (Year 1): Review **100%** of the supplemental legal authority, through ordinance, order, or other policy related powers, to regulate construction site runoff. Enforce **100%** of the existing regulations to regulate storm water discharges. Provide number of enforcement actions taken within the annual report.
- 2020 (Year 2): Update (as applicable) **100%** of the legal authority to regulate construction site runoff. Enforce **100%** of the regulations. Provide all updates to regulations and number of enforcement actions taken within the annual report.
- 2021 (Year 3): Update (as applicable) **100%** of the legal authority to regulate construction site runoff. Enforce **100%** of the regulations. Provide all updates to regulations and number of enforcement actions taken within the annual report.
- 2022 (Year 4): Update (as applicable) **100%** of the legal authority to regulate construction site runoff. Enforce **100%** of the regulations. Provide all updates to regulations and number of enforcement actions taken within the annual report.
- 2023 (Year 5): Update (as applicable) **100%** of the legal authority to regulate construction site runoff. Enforce **100%** of the regulations. Provide all updates to regulations and number of enforcement actions taken within the annual report.

Responsible Party:

Building Department

2. **(CS-2)** Construction Inspection Procedures: Develop/Update inspection procedures and educate the local construction community on local storm water regulations related to construction activities

Implementation Tasks:

1. Notify contractors of the need for use of temporary erosion controls- Control of other construction related wastes- Operational and general prohibitions- Site closure and stabilization requirements- On-site documentation and records- Enforcement actions and on-site communication issues
2. Review/Modify inspection forms and procedures necessary to inspect local construction sites in order to ensure compliance with local construction storm water regulations. (
3. Provide notification to the local construction community of the updated inspection procedures.

Measurable Goals:

2019 (Year 1): Review/Update **100%** of the inspection forms and procedures ensuring local regulation are addressed. Inform and receive comments from **50%** of the local construction community any updates to procedures. Consider the effect of the comments and make changes as needed the next permit year. Provide copy of inspection form and updated procedures within the annual report.

2020 (Year 2): Review/Update **100%** of the inspection forms and procedures ensuring local regulation are addressed. Inform and receive comments from **50%** of the local construction community any updates to procedures. Consider the effect of the comments and make changes as needed the next permit year. Provide copy of inspection form and updated procedures within the annual report.

2021 (Year 3): Review/Update **100%** of the inspection forms and procedures ensuring local regulation are addressed. Inform and receive comments from **50%** of the local construction community any updates to procedures. Consider the effect of the comments and make changes as needed the next permit year. Provide copy of inspection form and updated procedures within the annual report.

2022 (Year 4): Review/Update **100%** of the inspection forms and procedures ensuring local regulation are addressed. Inform and receive comments from **50%** of the local construction community any updates to procedures. Consider the effect of the comments and make changes as needed the next permit year. Provide copy of inspection form and updated procedures within the annual report.

2023 (Year 5): Review/Update **100%** of the inspection forms and procedures ensuring local regulation are addressed. Inform and receive comments from **50%** of the local construction community any updates to procedures. Consider the effect of the comments and make changes as needed the next permit year. Provide copy of inspection form and updated procedures within the annual report.

Responsible Party:

Building Department

3. **(CS-3)** Construction Plans Review: Implement a construction plans review process that focuses on compliance with local construction storm water regulations.

Implementation Tasks:

1. Review/Develop/Update a process to obtain construction plans for review to determine compliance with local construction storm water regulations.
2. Develop/Update internal tracking and plan review procedures to cover the following issues:-
Conformance to local storm water regulations- Appropriate use of temporary erosion controls-
Inclusion of any required local, state, and/or federal storm water permit documents
3. Educate the local construction community (contractors, developers, engineers, architects) on the construction plans review process.
4. Implement the construction plans review procedures for local construction sites.
5. Notify the owners of construction plans when deficiencies are found in the plans during the review process.
6. Maintain records of plans reviewed and approved for construction under this program.

Measurable Goals:

- 2019 (Year 1): Review/Update process to obtain construction plans for review to determine compliance with local construction storm water regulations. Educate **100%** of the local construction community of changes to the review process. Enforce **100%** of the plan review process. Provide samples of the plans reviewed with the annual report.
- 2020 (Year 2): Review/Update process to obtain construction plans for review to determine compliance with local construction storm water regulations. Educate **100%** of the local construction community of changes to the review process. Enforce **100%** of the plan review process. Provide samples of the plans reviewed with the annual report.
- 2021 (Year 3): Review/Update process to obtain construction plans for review to determine compliance with local construction storm water regulations. Educate **100%** of the local construction community of changes to the review process. Enforce **100%** of the plan review process. Provide samples of the plans reviewed with the annual report.
- 2022 (Year 4): Review/Update process to obtain construction plans for review to determine compliance with local construction storm water regulations. Educate **100%** of the local construction community of changes to the review process. Enforce **100%** of the plan review process. Provide samples of the plans reviewed with the annual report.
- 2023 (Year 5): Review/Update process to obtain construction plans for review to determine compliance with local construction storm water regulations. Educate **100%** of the local construction community of changes to the review process. Enforce **100%** of the plan review process. Provide samples of the plans reviewed with the annual report.

Responsible Party:

Building Department

4. **(CS-4)** Construction Site Inspection: Conduct inspections of local construction sites that discharge storm water to the MS4 to determine compliance with local construction storm water regulations.

Implementation Tasks:

1. Develop/Update internal procedures for tracking new and on-going construction activities.

2. Train permittee inspection personnel on local construction storm water regulations and inspection procedures.
3. Inspect qualifying construction sites using appropriate inspection procedures and forms to ensure compliance with local storm water regulations.
4. Issue enforcement actions to owners and operators of local construction sites that are not in compliance with local construction storm water regulations.
5. Maintain records of construction site inspections, enforcement actions, and corrective actions performed by local construction site owners and operators.

Measurable Goals:

- 2019 (Year 1): Train **100%** of inspection personnel on storm water regulations. Inspect **100%** of qualifying construction sites of compliance with storm water regulations. Issue enforcement actions to **100%** of owners and operators of local construction sites that do not comply with the storm water regulations. Provide inspection training sign-in sheet and the number of enforcement actions within the annual report.
- 2020 (Year 2): Train **100%** of inspection personnel on storm water regulations. Inspect **100%** of qualifying construction sites of compliance with storm water regulations. Issue enforcement actions to **100%** of owners and operators of local construction sites that do not comply with the storm water regulations. Provide inspection training sign-in sheet and the number of enforcement actions within the annual report.
- 2021 (Year 3): Train **100%** of inspection personnel on storm water regulations. Inspect **100%** of qualifying construction sites of compliance with storm water regulations. Issue enforcement actions to **100%** of owners and operators of local construction sites that do not comply with the storm water regulations. Provide inspection training sign-in sheet and the number of enforcement actions within the annual report.
- 2022 (Year 4): Train **100%** of inspection personnel on storm water regulations. Inspect **100%** of qualifying construction sites of compliance with storm water regulations. Issue enforcement actions to **100%** of owners and operators of local construction sites that do not comply with the storm water regulations. Provide inspection training sign-in sheet and the number of enforcement actions within the annual report.
- 2023 (Year 5): Train **100%** of inspection personnel on storm water regulations. Inspect **100%** of qualifying construction sites of compliance with storm water regulations. Issue enforcement actions to **100%** of owners and operators of local construction sites that do not comply with the storm water regulations. Provide inspection training sign-in sheet and the number of enforcement actions within the annual report.

Responsible Party:

Building Department

5. **(CS-5)** Prohibited Discharges - Maintain 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; and,

- d. Soaps or solvents used in vehicle and equipment washing;
- e. Discharges from dewatering activities, including discharges from dewatering of trenches and excavations, unless managed by appropriate BMPs.

Implementation Tasks:

1. Monitor wastewater from washout of concrete and wastewater from water well drilling operations, unless managed by an appropriate control.
2. Monitor wastewater from washout and cleanout from stucco, paint, from release oils, and other construction materials.
3. Monitor wastewater from fuels, oils, or other pollutants used in vehicle and equipment operation and maintenance.
4. Monitor wastewater from soaps or solvents in vehicle and equipment washing.
5. Monitor wastewater from dewatering activities, including discharges from dewatering of trenches and excavations, unless managed by appropriate BMP's.

Measurable Goals:

- 2019 (Year 1): Issue enforcement actions to **100%** of owners and operators of local construction sites that do not comply with local construction storm water regulations. Provide number of enforcement actions within the annual report.
- 2020 (Year 2): Issue enforcement actions to **100%** of owners and operators of local construction sites that do not comply with local construction storm water regulations. Provide number of enforcement actions within the annual report.
- 2021 (Year 3): Issue enforcement actions to **100%** of owners and operators of local construction sites that do not comply with local construction storm water regulations. Provide number of enforcement actions within the annual report.
- 2022 (Year 4): Issue enforcement actions to **100%** of owners and operators of local construction sites that do not comply with local construction storm water regulations. Provide number of enforcement actions within the annual report.
- 2023 (Year 5): Issue enforcement actions to **100%** of owners and operators of local construction sites that do not comply with local construction storm water regulations. Provide number of enforcement actions within the annual report.

Responsible Party:

Building Department

4.0 Post-Construction Storm Water Management in New Development and Redevelopment

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

with regard to project designs that minimize water quality impacts are described in the Public Education minimum measure. Evaluation of the success of this minimum measure will be through careful analysis of the measurable goals for each BMP included in this minimum measure. Measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. The responsibility for implementation of this minimum measure is described with each BMP procedure. Long-term operation and maintenance of measures shall be provided by the City for public infrastructure and by Private Developer's licensed/certified representatives on private facilities.

Best Management Practices:

1. **(PC-1)** Post-Construction Runoff Legal Authority: Review/Develop/Update adequate legal authority to require post-construction control measures and maintenance of post-construction control measures in areas of new and redevelopment.

Implementation Tasks:

1. Research existing legal authority available to regulate post-construction runoff.
2. If necessary, Develop/Update supplemental legal authority through ordinance, order, or other policy related legal powers to regulate post-construction runoff.
3. Develop/Update draft regulations and educational materials necessary to inform the local development community (developers, designers, engineers, architects) of the proposed local post-construction runoff regulations.
4. Formally adopt the final post-construction runoff regulations in accordance with all applicable public notification regulations.
5. Provide sufficient notification of the adopted post-construction runoff regulations to the local development community.
6. Enforce the post-construction runoff regulations as appropriate to regulate runoff from new and re-development projects.

Measurable Goals:

- 2019 (Year 1): Develop/Review/Update stormwater quality guidelines and regulations for post-development stormwater quality. Educate **100%** of new development personnel of the regulations and enforce **100%** of the regulations. Provide plan samples showing post-construction measures within the annual report.
- 2020 (Year 2): Develop/Review/Update stormwater quality guidelines and regulations for post-development stormwater quality. Educate **100%** of new development personnel of the regulations and enforce **100%** of the regulations. Provide plan samples showing post-construction measures within the annual report.
- 2021 (Year 3): Develop/Review/Update stormwater quality guidelines and regulations for post-development stormwater quality. Educate **100%** of new development personnel of the regulations and enforce **100%** of the regulations. Provide plan samples showing post-construction measures within the annual report.
- 2022 (Year 4): Develop/Review/Update stormwater quality guidelines and regulations for post-development stormwater quality. Educate **100%** of new development personnel of the regulations and enforce **100%** of the regulations. Provide plan samples showing post-construction measures within the annual report.
- 2023 (Year 5): Develop/Review/Update stormwater quality guidelines and regulations for post-development stormwater quality. Educate **100%** of new development

personnel of the regulations and enforce **100%** of the regulations. Provide plan samples showing post-construction measures within the annual report.

Responsible Party:

Building Department

2. **(PC-2)** New Development and Re-development Plans Review: Systematically review development and re-development plans to ensure compliance with local post-construction runoff regulations

Implementation Tasks:

1. Develop/Update a process to obtain development construction plans for review to determine compliance with local post-construction runoff regulations.
2. Develop/Update internal tracking and plan review procedures to ensure developer feedback and developer appeal.
3. Educate the local development community on the local development plans review process.
4. Implement the development plans review process.
5. Notify developers when revisions are made in the plan review process.
6. Maintain records of development plans reviewed and actions taken under this program.

Measurable Goals:

- 2019 (Year 1): Develop/Review/Update tracking and plan review procedures to ensure **100%** of new or applicable redevelopment projects meet the regulations. Provide sample of projects tracked and the plans with in the annual report.
- 2020 (Year 2): Develop/Review/Update tracking and plan review procedures to ensure **100%** of new or applicable redevelopment projects meet the regulations. Provide sample of projects tracked and the plans with in the annual report.
- 2021 (Year 3): Develop/Review/Update tracking and plan review procedures to ensure **100%** of new or applicable redevelopment projects meet the regulations. Provide sample of projects tracked and the plans with in the annual report.
- 2022 (Year 4): Develop/Review/Update tracking and plan review procedures to ensure **100%** of new or applicable redevelopment projects meet the regulations. Provide sample of projects tracked and the plans with in the annual report.
- 2023 (Year 5): Develop/Review/Update tracking and plan review procedures to ensure **100%** of new or applicable redevelopment projects meet the regulations. Provide sample of projects tracked and the plans with in the annual report.

Responsible Party:

Building Department

3. **(PC-3)** Development Project Inspection Procedures: Develop/Update inspection forms and procedures for new development and re-development project inspections based on the local post-construction runoff regulations.

Implementation Tasks:

1. Develop/Update a list of items to incorporate in the inspection of development and

re-development project sites.

2. Develop/Update draft inspection forms and procedures necessary to inspect local new and re-development projects in order to ensure compliance with local post-construction runoff regulations and approved plans.
3. Produce the final version of the local development project inspection forms and procedures.
4. Provide appropriate notification to the local development community on the final inspection forms and procedures.

Measurable Goals:

- 2019 (Year 1): Develop/Review/Update draft inspection forms and procedures necessary to inspect **100%** local new and re-development projects in order to ensure compliance with post-construction runoff regulations and approved plans. Provide sample of forms within the annual report.
- 2020 (Year 2): Develop/Review/Update draft inspection forms and procedures necessary to inspect **100%** local new and re-development projects in order to ensure compliance with post-construction runoff regulations and approved plans. Provide sample of forms within the annual report.
- 2021 (Year 3): Develop/Review/Update draft inspection forms and procedures necessary to inspect **100%** local new and re-development projects in order to ensure compliance with post-construction runoff regulations and approved plans. Provide sample of forms within the annual report.
- 2022 (Year 4): Develop/Review/Update draft inspection forms and procedures necessary to inspect **100%** local new and re-development projects in order to ensure compliance with post-construction runoff regulations and approved plans. Provide sample of forms within the annual report.
- 2023 (Year 5): Develop/Review/Update draft inspection forms and procedures necessary to inspect **100%** local new and re-development projects in order to ensure compliance with post-construction runoff regulations and approved plans. Provide sample of forms within the annual report.

Responsible Party:

Building Department

4. **(PC-4)** New Development and Re-development Project Inspection: Inspect local new development and re-development projects to ensure conformance to approved plans and local post-construction runoff regulations.

Implementation Tasks:

1. Develop/Update internal tracking procedures for tracking development projects that are under construction and that have been completed.
2. Train inspection personnel on local post-construction runoff regulations and final inspection procedures.
3. Inspect qualifying development project sites using adopted inspection forms and procedures to ensure conformance with local post-construction runoff regulations.
4. Issue enforcement actions to owners or operators of local development projects that are not in

compliance with local post-construction runoff regulations.

5. Maintain records of development project site inspections, enforcement actions, and corrective actions performed by local development project owners.

Measurable Goals:

2019 (Year 1): Develop/Review/Update list of local development projects that qualify for inspection under post-construction runoff regulations. Inspect **100%** of the project sites and issue enforcement actions of violators. Provide samples of inspections within the annual report.

2020 (Year 2): Develop/Review/Update list of local development projects that qualify for inspection under post-construction runoff regulations. Inspect **100%** of the project sites and issue enforcement actions of violators. Provide samples of inspections within the annual report.

2021 (Year 3): Develop/Review/Update list of local development projects that qualify for inspection under post-construction runoff regulations. Inspect **100%** of the project sites and issue enforcement actions of violators. Provide samples of inspections within the annual report.

2022 (Year 4): Develop/Review/Update list of local development projects that qualify for inspection under post-construction runoff regulations. Inspect **100%** of the project sites and issue enforcement actions of violators. Provide samples of inspections within the annual report.

2023 (Year 5): Develop/Review/Update list of local development projects that qualify for inspection under post-construction runoff regulations. Inspect **100%** of the project sites and issue enforcement actions of violators. Provide samples of inspections within the annual report.

Responsible Party:

Building Department

5.0 Pollution Prevention and Good Housekeeping for Municipal Operations

The Pollution Prevention / Good Housekeeping minimum measure consists of Best Management Practices (BMP's) that focus on training and on the prevention or reduction of pollutant runoff from municipal operations. The BMPs describe the use of available training materials available from the EPA, your State, Tribe or other organizations; specific municipal operations that are impacted by the proposed operation and maintenance programs (BMPs); a list of municipally-owned industrial facilities which require other storm water discharge permits; maintenance activities, schedules and long term inspection procedures for controls to reduce floatables and other pollutants; controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, waste transfer stations fleet or maintenance shops with outdoor storage areas, and salt/sand storage locations and snow disposal areas; procedures for the proper disposal of waste removed from the MS4 and municipal operations, including dredge spoil, accumulated sediments, floatables and other debris; and procedures to ensure that new flood management projects are assessed for impacts on water quality and existing projects are assessed for incorporation of additional water quality protection devices or practices. Evaluation of the success of this minimum measure will be through careful analysis of the measurable goals for each BMP included in this minimum measure. Measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. The responsibility for implementation of this minimum measure is described with each BMP procedure.

Best Management Practices:

1. **(GH-1)** Permittee-owned Facilities and Control Inventory: All permittees shall Develop/Update and maintain an inventory of facilities and stormwater controls that it owns and operates within the regulated area of the small MS4.

Implementation Tasks:

1. List inventory of permitte-owned facilities.
2. Prepare and adopt SWP3's for each facility required by permit from TCEQ.

Measurable Goals:

2019 (Year 1): Identify/Update list of **100%** of permitte-owned facilities and provide SWPPP for **100%** of facilities required by permit from TCEQ. Provide list and SWPPPs with annual report.

2020 (Year 2): Identify/Update list of **100%** of permitte-owned facilities and provide SWPPP for **100%** of facilities required by permit from TCEQ. Provide list and SWPPPs with annual report.

2021 (Year 3): Identify/Update list of **100%** of permitte-owned facilities and provide SWPPP for **100%** of facilities required by permit from TCEQ. Provide list and SWPPPs with annual report.

2022 (Year 4): Identify/Update list of **100%** of permitte-owned facilities and provide SWPPP for **100%** of facilities required by permit from TCEQ. Provide list and SWPPPs with annual report.

2023 (Year 5): Identify/Update list of **100%** of permitte-owned facilities and provide SWPPP for **100%** of facilities required by permit from TCEQ. Provide list and SWPPPs with annual report.

Responsible Party:

Public Works

2. **(GH-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.

Implementation Tasks:

1. Inform or train appropriate employees involved in implementing pollution prevention and good housekeeping practices.
2. Maintain a training attendance list for inspection by TCEQ when requested.

Measurable Goals:

2019 (Year 1): Train **100%** of inspection personnel in implementing pollution prevention and good housekeeping practices. Provide sign-in sheet of personal in attendance with annual report.

2020 (Year 2): Train **100%** of inspection personnel in implementing pollution prevention and good housekeeping practices. Provide sign-in sheet of personal in attendance with annual report.

2021 (Year 3): Train **100%** of inspection personnel in implementing pollution prevention and good housekeeping practices. Provide sign-in sheet of personal in attendance with annual report.

2022 (Year 4): Train **100%** of inspection personnel in implementing pollution prevention and good

housekeeping practices. Provide sign-in sheet of personal in attendance with annual report.

2023 (Year 5): Train **100%** of inspection personnel in implementing pollution prevention and good housekeeping practices. Provide sign-in sheet of personal in attendance with annual report.

Responsible Party:

Public Works Department

3. (GH-3) Disposal of Waste Material

Implementation Tasks:

1. 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.

Measurable Goals:

2019 (Year 1): Dispose **100%** of waste materials in accordance with 30 TAC Chapters 330 or 335, as applicable. Provide disposal records applicable to hazardous waste materials removed from MS4 system with annual report.

2020 (Year 2): Dispose **100%** of waste materials in accordance with 30 TAC Chapters 330 or 335, as applicable. Provide disposal records applicable to hazardous waste materials removed from MS4 system with annual report.

2021 (Year 3): Dispose **100%** of waste materials in accordance with 30 TAC Chapters 330 or 335, as applicable. Provide disposal records applicable to hazardous waste materials removed from MS4 system with annual report.

2022 (Year 4): Dispose **100%** of waste materials in accordance with 30 TAC Chapters 330 or 335, as applicable. Provide disposal records applicable to hazardous waste materials removed from MS4 system with annual report.

2023 (Year 5): Dispose **100%** of waste materials in accordance with 30 TAC Chapters 330 or 335, as applicable. Provide disposal records applicable to hazardous waste materials removed from MS4 system with annual report.

Responsible Party:

Public Works Department

4. (GH-4) Contractor Requirements and Oversight: Any contractors hired by the permittee to perform maintenance activities on permittee-owned facilities must be contractually required to comply with all of the storm water control measures, good housekeeping practices, and facility specific storm water management operating procedures described in Parts III B.5.(2)-(6). 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.

Implementation Tasks:

1. 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

2. 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.

Measurable Goals:

- 2019 (Year 1): Require **100%** of contractors at permittee-owned facilities to comply with all of the stormwater control measures, good housekeeping practices, and facility specific stormwater management operating procedures. Provide list of MS4 contractors and compliance records with annual report.
- 2020 (Year 2): Require **100%** of contractors at permittee-owned facilities to comply with all of the stormwater control measures, good housekeeping practices, and facility specific stormwater management operating procedures. Provide list of MS4 contractors and compliance records with annual report.
- 2021 (Year 3): Develop oversight procedures, maintain on site and make available for inspection by TCEQ. Require **100%** of contractors at permittee-owned facilities to comply with all of the stormwater control measures, good housekeeping practices, and facility specific stormwater management operating procedures. Provide list of MS4 contractors and compliance records with annual report.
- 2022 (Year 4): Review/Update oversight procedures, maintain on site and made available for inspection by TCEQ. Require **100%** of contractors at permittee-owned facilities to comply with all of the stormwater control measures, good housekeeping practices, and facility specific stormwater management operating procedures. Provide list of MS4 contractors and compliance records with annual report.
- 2023 (Year 5): Review/Update oversight procedures, maintain on site and made available for inspection by TCEQ. Require **100%** of contractors at permittee-owned facilities to comply with all of the stormwater control measures, good housekeeping practices, and facility specific stormwater management operating procedures. Provide list of MS4 contractors and compliance records with annual report.

Responsible Party:

Public Works Department

5. (GH-5) Municipal Operation and Maintenance Activities: Assessment of permittee-owned operations
All permittees shall evaluate operation and maintenance (O&M) activities for their potential to discharge pollutants into stormwater, including but not limited to:

Implementation Tasks:

1. Road and parking lot maintenance may include such areas as pothole repair, pavement marking, sealing, and re-paving.
2. Right-of-way maintenance, including mowing, herbicide and pesticide application, and planting vegetation.
3. 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).
4. Develop/Update 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 will include replacing materials and chemicals with more environmentally benign materials or methods.

5. Inspect 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.

Measurable Goals:

- 2019 (Year 1): Assess **100%** of permittee-owned operations and evaluate operation and maintenance (O&M) activities. Provide assessments with annual report.
- 2020 (Year 2): Assess/Update **100%** of permittee-owned operations and evaluate operation and maintenance (O&M) activities. Provide assessments with annual report.
- 2021 (Year 3): Assess/Update **100%** of permittee-owned operations and evaluate operation and maintenance (O&M) activities. Provide assessments with annual report.
- 2022 (Year 4): Assess/Update **100%** of permittee-owned operations and evaluate operation and maintenance (O&M) activities. Provide assessments with annual report.
- 2023 (Year 5): Assess/Update **100%** of permittee-owned operations and evaluate operation and maintenance (O&M) activities. Provide assessments with annual report.

Responsible Party:

Public Works

ADDITIONAL DETAILS:

- **The City of Seabrook City discharges into the following water segments: 2421OW (Upper Galveston Bay Oyster Waters), 2421 (Upper Galveston Bay), 2421A (Clear Lake Channel), 2425 (Clear Lake), 2425A (Taylor Lake), 2421C (Pine Gully).**
- **City must check annually if a waterbody was added to the EPA approved Texas Integrated Report of Surface Water quality for Clean Water Act Section 305(b) and 303(d).**
- **Six TMDLs for Bacteria in Waters of the Upper Gulf Coast was adopted August 2008 with latest revision in October 2018. Numerical Waste Load Allocations (WLA) are not listed for MS4s within the document. Table 12 on page 38 of the report states “Numerical concentrations requirements are unreasonable for storm water runoff. This TMDL will require MS4s to follow implementation of bacteria reduction efforts and best management practices.”**
- **To address the TMDL impairment of bacteria Seabrook’s BMP can be found from the following:**
 - o **Sanitary Sewer Systems**
 - ID-6 on page 12
 - ID-7 on page 13
 - ID-8 on page 14
 - o **On-site Sewage Facilities**
 - ID-6 on page 12
 - o **Illicit Discharges and Dumping**
 - ID-3 on page 10
 - ID-4 on page 10

- ID-5 on page 11
- Animal Sources (pet waste) and Residential Education
 - PE-1 on page 1
 - PE-2 on page 2
 - PE-3 on page 3
 - PE-4 on page 3
 - PE-5 on page 4
 - PE-6 on page 5
- BMPs implemented on an annual basis shall be completed by December 24 of each year. This is one month before the issue date (1/24/2019) of the Small MS4 General Permit and annual reporting year.