

Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number TXR040000

A. General Information

Authorization Number: TXR040008

Reporting Year (year will be either 1, 2, 3, 4, or 5): 5-Interim Year

Annual Reporting Year Option Selected by MS4:

Calendar Year: 2019

Reporting period beginning date: (month/date/year) Jan 1, 2019

Reporting period end date: (month/date/year) Dec 31, 2019

MS4 Operator Level: 3 Name of MS4: City of College Station

Contact Name: Debbie Stickles Telephone Number: 979-764-3570

Mailing Address: 1101 Texas Ave, College Station, TX 77842

E-mail Address: dstickles@cstx.gov

A copy of the annual report was submitted to the TCEQ Region: YES X NO

Region the annual report was submitted to: TCEQ Region 9

B. Status of Compliance with the MS4 GP and SWMP

1. Provide information on the status of complying with permit conditions: (TXR040000 Part IV.B.2)

CONDITION	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 (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.).	X		
Permittee conducted an annual review of its SWMP in conjunction with preparation of the annual report	X		

2. Provide a general assessment of the appropriateness of the selected BMPs.

MCM	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
1	1.1 Educational Topics	<p>Yes, by reviewing stormwater quality topics and websites to maintain relevancy and currency, various groups of citizens can relate to subject material.</p> <p>The City maintains several modes to ensure availability to the public such as a website, city webpages, digital and hard copy newsletters, utility bill inserts, etc.</p>
1	1.2 Interagency Cooperation	<p>Yes, Brazos Clean Water (BCW) Committee worked on team efforts to educate the public and outreach for the entire county. BCW maintained an organizational webpage but due to inclement weather, did not participate in 2019 Brazos Valley Earth Day. This event was the organization's largest outreach event. The group has since then dissolved due to non-participation. With the new initiative of the Navasota Lower Limestone Lake Watershed Protection Plan, this group's initial need may no longer be relevant.</p>
1	1.3 Educational Materials	<p>Yes, The City maintains several modes to ensure availability to the public such as a website, city webpages, digital and hard copy newsletters, utility bill inserts, etc.</p> <p>College Station reached citizens through three (3) Utility Bill Inserts, three (3) articles in the city distributed Developer newsletter, free educational materials at city facilities and informational flyers handed out at events. In 2019, nine (9) Water Service facility tours were conducted reaching five hundred ninety-five (595) people. Additionally, seventy-seven (77) irrigation checkups were directed and three (3) irrigation efficiency workshops. Participants in these programs learned about controlling irrigation runoff and what items should be kept out of both sanitary and storm sewer systems.</p>
1	1.4 Adopt-A-Greenway Program	<p>Yes, one hundred seventy (170) volunteers from nine (9) local organizations participated in fourteen (14) greenway cleanups. One hundred fifty-six (156) acres were adopted in the 2019 calendar year ensuring a wider reach of cleanups within the city.</p>
1	1.5 Adopt-A-Street	<p>Yes, the Adopt-A-Street program has facilitated the adoption of nearly seventy-three (73) centerline miles of TxDOT and City maintained streets by over seventy-six (76) organizations from the community and Texas A&M University.</p>

MCM	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
1	1.6 Storm Drain Stenciling	Yes, by identifying/stenciling drainage infrastructure in subdivisions developed pre-2007, public awareness of stormwater is established as well as recognition of the Public Works Department's "Only Rain Down the Drain" stormwater quality and inlet protection program. Over 1,800 markers have been applied to inlets since May 2012. As of 2019, all pre-2007 curb inlets have been identified with "No Dumping, Drains to River" inlet markers. All new development is required to install storm inlet inlays per the Unified Design Guidelines.
1	1.7 Volunteer Monitoring	Yes, the volunteer monitor program provides additional protection and surveillance to local waterways within the city.
2	2.1 MS4 Mapping	Yes, maintaining maps containing current storm sewer, sanitary sewer infrastructure, water bodies, as well as SSOs and leaks, allows for quick response for reports relating to stormwater concerns. Mapping also assists with future planning of new and existing development throughout the city.
2	2.2 Staff Training	Yes, staff training allows for the re-education of protocols, standard operating procedures, and questions for items encountered in the field.
2	2.3 City Stormwater Hot Spots	Yes, the list of high-priority Public Works facilities keeps City employees aware of potential hazards to surrounding surface waters.
2	2.4 Leaking Above and Below Ground Storage Tanks	Yes, a list of City-owned storage tanks provides a helpful resource when assessing possible hazards to surrounding surface waters.
2	2.5 Tracking and Investigating Illicit Discharge	Yes, the system of recording and tracking each reported or discovered illicit discharge event, public reporting processes, and following corrective actions allows the City to evaluate the current standard procedures for any amendments, as well as determine precautionary measures to reduce the occurrences.
2	2.6 Elimination of Sewer System and Grey Water Discharge	Yes, maintenance and repairs on the sanitary sewer system are ongoing and done as needed. By reporting SSOs, leaks, and corrective actions, the Water Services Department can assess areas of high concern or higher than normal demand. Areas of concern or large demand can be considered for capital improvement projects.
2	2.7 MS4 Outfall Screening	Yes, with outfall locations, investigations for possible SSOs, leaks or public reporting can utilize the data to determine possible source locations and causes. Outfalls are screened by Drainage Maintenance Division personnel as routine maintenance is being performed.
2	2.8 Eliminate Sanitary Sewer Overflow	Yes, the Wastewater Master Plan is continually reviewed as new development is constructed to ensure proper design and reduce sanitary sewer overflows.

MCM	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
2	2.9 Public Reporting of Illicit Discharge	Yes, by maintaining and publicizing the illicit discharge hotline, citizens have access to reporting an illicit discharge or stormwater issue. Internal procedures in receiving hotline calls have been developed and are being improved to ensure inter-department communications. Additional methods of reporting also include the See.Click.Fix app, which gives the local citizens the ability to report issues, via a cellular phone app, with specific location information and photos.
2	2.10 Legal Authority	Yes, ordinances were reviewed concerning prohibited illicit discharges, but no changes or resolutions were made.
3	3.1 Legal Authority	Yes, ordinances were reviewed concerning construction activity regulations, but no changes or resolutions were made.
3	3.2 Construction Plan Review	Yes, Planning and Development records site plan reviews and approvals electronically within the TRAKiT system. Each review allows multiple departments to audit a proposed site. Within the review process, drainage, stormwater controls, and erosion control plans are viewed and checked for adequacy.
3	3.3 Construction Related Public Reporting	Yes, public reports identified sites with continual erosion control or drainage concerns. Stormwater Inspector reviewed identified sites and reports were attached to the site's TRAKiT record.
3	3.4 Construction Site Inspection	Yes, erosion control and public complaints are checked throughout the construction process with results of inspections electronically databased within the TRAKiT system. By continually inspecting sites for compliance, the possibility of pollutants is reduced.
3	3.5 Construction Site Enforcement	Yes, erosion control and public complaints are checked throughout the construction process with results of inspections electronically databased within the TRAKiT system. By continually inspecting sites for compliance, the possibility of pollutants is reduced. Enforcement encourages compliance within the construction community.
3	3.6 Construction Site Enforcement	Yes, erosion control and public complaints are checked throughout the construction process with results of inspections electronically databased within the TRAKiT system.
4	4.1 Legal Authority	Yes, ordinances were reviewed concerning long term operations and post-development maintenance, but no changes or resolutions were made.

MCM	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
4	4.2 Post-Construction Regulation	Yes, Planning and Development records site plan reviews and approvals electronically within the TRAKiT system. Within the review process, drainage, stormwater controls, and erosion control plans are viewed and checked for adequacy. Prior to the release of Certificate of Occupancy, inspectors examine the location for post-construction compliance based on approved plans. Guidelines for post-construction are maintained on the Development Engineering web page to ensure construction's proper maintenance.
4	4.3 Post-Construction Inspection	Yes, Planning and Development records site plan reviews and approvals electronically within the TRAKiT system. Within the review process, drainage, stormwater controls, and erosion control plans are viewed and checked for adequacy. Prior to the release of Certificate of Occupancy, inspectors examine the location for post-construction compliance based on approved plans. New inspectors shadow veteran inspectors during the training period. All inspectors attend a monthly meeting with Development Engineers, to ensure proper protocol and standard operating procedures are being followed.
4	4.4 Post Construction Enforcement	Yes, prior to the release of Certificate of Occupancy, inspectors examine the location for post-construction compliance based on approved plans. Non-compliant sites are not issued a full Certificate of Occupancy. This post construction enforcement keeps stormwater controls functioning and adequate.
4	4.5 City Owned Stormwater Controls	Yes, maintaining maps containing current storm sewer infrastructure assists with future planning of new and existing development, facilities and rehabilitated areas throughout the city as well as allows for quick response for reports relating to stormwater concerns.
5	5.1 City Inventory	Yes, by keeping a current inventory of City properties, permits and facilities ensure the potential of discharged pollutants into storm drains or subsequent surface waters is reduced or eliminated.
5	5.2 City Facility Permit Requirements	Yes, both Carters Creek and Lick Creek WWTPs are current and in compliance with their TCEQ stormwater permits. With TCEQ approval, both facilities are determined to be functioning at state level compliance.
5	5.3 Staff Training	Yes, staff training allows for the re-education of good housekeeping and pollution prevention protocols, standard operating procedures, and questions for items encountered in the everyday operations.
5	5.4 Pollutants from City Facilities	Yes, by identifying potential pollutants in Public Works Operations and Public Works Facilities, employees become aware of accidental discharge possibilities. Sites are then routinely checked, and procedures are in place, in case of a spill event.

MCM	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
5	5.5 Pesticide and Herbicide Application	Yes, pesticides and herbicides are only applied by licensed applicators or by personnel filing under the Texas Department of Agriculture's Q570A Direct Supervision Affidavit. This is to ensure City staff maintains proper handling and application procedures as well as minimize pesticide and herbicide runoff.
5	5.6 Catch Basin and Inlet Cleaning	Yes, GIS mapping of catch basins, surface inlets, and storm sewer manholes allows for locations to be found with ease. Maintenance completed in a dry period, as well as records of any screening conducted by Public Works employees, are stored in the work order system, CityWorks. With routine maintenance and screening, debris and pollutants are removed from surrounding surface waterbodies.
5	5.7 Roadway Maintenance and Sweeping	Yes, by implementing regular street sweeping rotations as well as sweeping city-owned parking lots as needed, litter and debris are removed from possibly entering the storm sewer system and surrounding surface waterbodies.
5	5.8 Spill Prevention and Control Countermeasures	Yes, SPCC plans are currently in compliance and are maintained for all applicable departments, College Station Utilities, Public Works, and Water Services. SPCC plans provide response and clean-up procedures for each specific location and their subsequent activities utilizing oil products.
5	5.9 Vehicle Maintenance	Yes, by washing vehicles in the City maintained grated "wash rack", possible pollutants are diverted from surface run off and instead collect in a containment basin equipped with a backflow preventer and oil water separator prior to being released into the sanitary sewer system. City vehicle maintenance inspections ensure proper maintenance and reduce oil, grease or other vehicle fluids from escaping city vehicles.

3. Describe progress towards achieving the goal of reducing the discharge of pollutants to the MEP. If no progress was made or the BMP did not result in a reduction in pollutants, provide an explanation:

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
1	1.3 Educational Materials	Utility Bill Inserts	3 articles (each to reach 28,000 households)	Pamphlets	Yes. Public awareness of stormwater and pollutants helps assist the general public in identifying areas to report to the City that may pose a threat to local waterways.
1	1.4 Adopt A Greenway	Volunteer Clean Up	14	Clean up event	Yes. Volunteers cleaned local greenways which reduces the litter items from greenways that may enter water bodies and increase E. coli amounts.

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
3	3.4 Construction Site Inspections	Construction Sites	1000	Daily stormwater inspections	Yes. By inspecting the contractor-owned construction sites, we can evaluate if proper BMPs are in place to reduce sediment discharge and erosion.
5	5.1 City Inventory	City Owned Landscaping	1683 curb miles	Area treated with pesticides	Yes. By ensuring staff has proper training in the application of pesticides and herbicides, pollution runoff from such chemicals is kept to a minimum.

4. Provide the measurable goals for each of the MCMs, and an evaluation of the success of the implementation of the measurable goals :

MCM(s)	MEASURABLE GOAL(s)	EXPLAIN PROGRESS TOWARD GOAL OR HOW GOAL WAS ACHIEVED. IF GOAL WAS NOT ACCOMPLISHED, PLEASE EXPLAIN
MCM 1	1.1.1 Review the current list of stormwater quality topics and delete outdated or redundant topics.	Met goal. Review of stormwater quality topics was done to keep topics relevant and current.
MCM 1	1.1.2 Review stormwater quality web sites for educational material and topics.	Met goal. Review of stormwater city webpage topics was done to keep topics relevant and current.
MCM 1	1.1.3 Update stormwater quality educational topics and procure educational materials.	Met goal. The City maintains and updates several modes to ensure availability to the public which includes the City stormwater and drainage city webpages. Planning and Development Services composed a 'Water Quality 101 & Pet Waste' pamphlet accompanying a frisbee advertising water quality initiatives for distribution at the Texas A&M University's Earth Day on April 26, 2019.
MCM 1	1.1.4 Develop or procure educational material for distribution.	Met goal. College Station developed three (3) Utility Bill Inserts, three (3) articles in the city distributed Developer newsletter and procured free educational materials to be distributed at city facilities.
MCM 1	1.2.1 Continue interagency cooperation with City of Bryan, Texas A&M, TxDOT, and Brazos County by actively participating in the Brazos Clean Water group.	Goal not met. Brazos Clean Water (BCW) Committee worked together on team efforts to educate the public and outreach for the entire county. BCW maintained an organizational webpage but due to inclement weather, did not participate in 2019 Brazos Valley Earth Day. This event was the organization's largest outreach event. The group has since then dissolved due to non-participation. With the new initiative of the Navasota Lower Limestone Lake Watershed Protection Plan, this group's initial need may no longer be relevant.
MCM 1	1.3.1 Update the Brazos Clean Water and City stormwater websites.	Met goal. The website is maintained and current. 2019 statistics for the number of website hits were eighty-one (81) views.

MCM(s)	MEASURABLE GOAL(s)	EXPLAIN PROGRESS TOWARD GOAL OR HOW GOAL WAS ACHIEVED. IF GOAL WAS NOT ACCOMPLISHED, PLEASE EXPLAIN
MCM 1	1.3.2 Broadcast public service announcements.	Met goal. Televised PSA has been removed from the rotation. The City of College Station has moved forward with more frequented modes of public outreach which include blogs, twitter, Facebook, face-to-face community interaction moments, and utility billing inserts.
MCM 1	1.3.3 Distribute utility bill inserts and newsletters on designated topics.	Met goal. Three (3) utility bill inserts, which is circulated to approximately 28,000 households and three (3) developer newsletter articles published online.
MCM 1	1.3.4 Make educational materials available in publicly accessed city managed locations, such as public works, city hall, community development department, etc.	Met goal. Educational materials are provided at each location and tracking of the amount distributed is approximately 400 pamphlets or brochures total.
MCM 1	1.4.1 Continue providing volunteer support in the Adopt-a-Greenway program.	Met goal. In 2019, one hundred seventy (170) volunteers from nine (9) local organizations participated in fourteen (14) greenway cleanups.
MCM 1	1.4.2 Identify local groups that may be interested in Adopt-a-Greenway program.	Met goal. In 2019, one hundred seventy (170) volunteers from nine (9) local organizations participated in fourteen (14) greenway cleanups.
MCM 1	1.4.3 Invite identified groups to join Adopt-a-Greenway program.	Met goal. In 2019, one hundred fifty-six (156) acres were adopted and seven (7) new groups showed interest in the program.
MCM 1	1.5.1 Identify local groups that may be interested in the Adopt-a-Street program.	Met goal. Adopt-A-Street currently has seventy-six (76) participating organizations with twenty-five (25) organizations on the waitlist.
MCM 1	1.5.2 Invite identified groups to join the Adopt-a-Street program.	Met goal. Nearly seventy-three (73) centerline miles of TxDOT and City maintained streets have been adopted with each organization required to perform four (4) clean ups per year. .
MCM 1	1.6.1 Identify areas for storm drain stenciling or re-stenciling.	Met goal. Drainage infrastructure in subdivisions developed pre-2007 are continuously evaluated to identify areas in need of stenciling. Over 1,800 markers have been applied to inlets since May 2012 as part of the Public Works Department's "Only Rain Down the Drain" stormwater quality and inlet protection program. As of 2019, all pre-2007 curb inlets have been identified with "No Dumping, Drains to River" inlet markers. All new development is required to install storm inlet inlays per the Unified Design Guidelines.
MCM 1	1.6.2 Continue to recruit community and campus organizations in need of service projects and/or hours for the Public Works "Only Rain Down the Drain" inlet protection program	Met goal. As of 2019, all pre-2007 curb inlets have been identified with "No Dumping, Drains to River" inlet markers. All new development is required to install storm inlet inlays per the Unified Design Guidelines. The City of College Station Public Works Department will reevaluate pre-2007 inlet markers at the next permit term to determine if this BMP is needed due to deterioration of markers.

MCM(s)	MEASURABLE GOAL(s)	EXPLAIN PROGRESS TOWARD GOAL OR HOW GOAL WAS ACHIEVED. IF GOAL WAS NOT ACCOMPLISHED, PLEASE EXPLAIN
MCM 1	1.7.1 Establish a volunteer program for conducting stormwater quality monitoring or dry weather screening	Met goal. With the coordination of TWRI and Texas Stream Team, the City and Brazos County Master Naturalists have developed a water sampling program for local waterways near stormwater outfalls.
MCM 1	1.7.2 Identify areas that are safe for volunteers to conduct stormwater monitoring.	Met goal. In early summer of 2016, City staff and TWRI determined six (6) possible locations. Three (3) locations were determined to be the best suitable and applicable to the goals of the program. Data of sampling can be found on the Texas Stream Team website for sites 81263, 81262 and 81264.
MCM 1	1.7.3 Develop a schedule for volunteer monitoring.	Exceeded goal. Brazos County Master Naturalists proposed a sampling schedule with the three (3) chosen locations. After City and TWRI review, the proposed schedule was approved, and sampling began in Sept 2016. Volunteer monitoring began one (1) year ahead of the proposed MS4 schedule. Sampling continued through 2019 at the three chosen sampling sites.
MCM 1	1.7.4 Invite groups to participate in volunteer monitoring program.	Met goal. Several groups, who had heard of the program with Brazos County Master Naturalists, have now approached TWRI and the City for more opportunities. The invitation is currently pending. Additional groups are undergoing training by TWRI before being assigned to additional sites.
MCM 2	2.1.1 Maintain a map of the City's storm sewer system, surface waters, and high-risk facilities.	Met goal. The "Storm Drainage" Feature Dataset in the Public Works Department's GIS is constantly being updated/revised for capital projects, new developments, facilities, and rehabilitated areas; TxDOT infrastructure was mapped by the contractor and is stored as Feature Dataset; IT GIS will continue to consume FEMA surface water and floodplain data.
MCM 2	2.1.2 Maintain a map of the City's sanitary sewer system with locations of sanitary sewer leaks and overflows.	Met goal. Leaks and overflows are tracked in the work order system, CityWorks. WSD can import, when needed, the locations of problematic areas which includes sanitary sewer leaks, spills, and overflows into a mapping system.
MCM 2	2.1.3 Maintain a map of the City's sanitary sewer system with locations of sanitary sewer leaks and overflows.	Met goal. The "Storm Drainage" Feature Dataset in the Public Works Department's GIS is constantly being updated/revised for capital projects, new developments, facilities, and rehabilitated areas; TxDOT infrastructure was mapped by a contractor and is stored as Feature Dataset;
MCM 2	2.2.1 Train staff to update MS4 maps.	Met goal. Training is on-going throughout all departments containing a GIS technician team. Currently, the City employs eleven (11) GIS analysts/technicians with two (2) analysts/technicians specifically trained to update stormwater drainage infrastructure.
MCM 2	2.2.2 Train inspection and outfall screening personnel on the identification of septic system discharge locations and internal tracking and reporting mechanisms.	Goal not met. Brazos County Health Department has authority over on-site sewage facilities (OSSFs). The revision was made to training concerning identification and reporting process in 2017. NOC was submitted with 2016 Annual Reporting.

MCM(s)	MEASURABLE GOAL(s)	EXPLAIN PROGRESS TOWARD GOAL OR HOW GOAL WAS ACHIEVED. IF GOAL WAS NOT ACCOMPLISHED, PLEASE EXPLAIN
MCM 2	2.2.3 Train personnel on the identification, tracking, and reporting of sanitary sewer leaks.	Met goal. New Water Services Department Field Operations personnel become licensed by TCEQ as Water Distribution and/or Wastewater Collection Operators. This along with their on-the-job training enables the individual to identify SSOs. The Water Services Department also trains their Field Operations employees to identify and report any SSO whether they are collection system or on-site sewage facility issues. Each response is tracked in the City Works work order system. All operators are trained to enter and track the work performed on SSOs. Stormwater training was given to sixty-one (68) WSD employees.
MCM 2	2.2.4 Train inspection and outfall screening personnel on the identification, tracking, and reporting of illicit discharges.	Met goal. Water Service Department trains Field Operations employees to identify illicit discharges as well as entering each event into the CityWorks work order system for tracking and reporting. All operators are trained to enter and track the work.
MCM 2	2.2.5 Train staff in the receiving of sanitary spills and overflows. Utility Dispatch personnel trained to receive reports and enter work requests, Field Operations to respond to sanitary sewer spills.	Met goal. This training is provided in numerous occasions during weekly staff meetings. Specific staff meetings are set to directly address SWP3, SPCC trainings, and other vital materials. City trained four (4) 'water' dispatchers for reporting illicit discharges by means of proper reporting mechanisms.
MCM 2	2.2.6 Train staff in the receiving of illicit discharge reports.	Met goal. This training is on-going. City trains employees to report illicit discharges by means of proper reporting mechanisms. The Water Services Department trains its employees to identify and report any SSO whether they are collection system or on-site sewage facility issues. Each response is tracked in the City Works work order system. All operators are trained to enter and track the work performed on SSOs.
MCM 2	2.3.1 Identify high-risk facilities in the City.	Met goal. A list of high-risk facilities is maintained and updated as identification occurs.
MCM 2	2.3.2 Conduct perimeter checks of high-risk facilities to ensure there is no pollutant runoff.	Goal not met. Currently, no perimeter check inspection documentation can be found on file for calendar year 2019. The position performing this duty became vacant in June of 2019. It should be noted that the City does have Capital Improvement Projects in transition to increase compliance efforts. Projects include a new secondary containment for an out-of-service vertical asphalt tank, fleet and wash rack upgrades, and removal/replacement of a fuel terminal. Perimeter checks resumed Jan 2020.
MCM 2	2.4.1 Identify <u>City owned</u> above and below ground storage tanks.	Met goal. A list of ASTs and USTs is maintained and updated as installation, removal, or abandon in place activities occur. Annual self-certification, registration, inspections, and delivery certificates are all current and in compliance with TCEQ-PST requirements.

MCM(s)	MEASURABLE GOAL(s)	EXPLAIN PROGRESS TOWARD GOAL OR HOW GOAL WAS ACHIEVED. IF GOAL WAS NOT ACCOMPLISHED, PLEASE EXPLAIN
MCM 2	2.5.1 Follow internal procedures for tracking, investigating, and reporting sanitary sewer overflows, and corrective actions that have been taken.	Met goal. City also trains employees to identify investigate and report through the work order system, CityWorks for work done on sanitary sewer overflows. Corrective actions are recorded in the work order system, CityWorks.
MCM 2	2.5.2 Use internal Work Order system to track reported illicit discharges or illegal dumping, investigate public reports, and corrective actions.	Met goal. Water Services Department and Planning and Development Services coordinate investigations and corrective actions of public reports concerning stormwater and local waterways. Documentation is kept on file after each public report investigation. Public Works Drainage Division perform the collection of bulk and large items in drainage ways that are/may obstruct water flows.
MCM 2	2.5.3 Train staff in the receiving of illicit discharges or illegal dumping.	Met goal. Water Service Department trains Field Operations employees to identify illicit discharges as well as entering each event into the CityWorks work order system for tracking and reporting. All operators are trained to enter and track the work. Public Works Drainage Division perform the collection of bulk and large items in drainage ways that are/may obstruct water flows and increase E. coli amounts. Public Infrastructure and Building Inspectors, a total of eleven (11), are trained to identify illicit discharges and illegal dumping that may occur at commercial or residential construction sites, as well as reporting mechanisms, should an incident occur.
MCM 2	2.6.1 Follow internal procedures for tracking, investigating, and reporting sanitary sewer leaks, and corrective actions that have been taken.	Met goal. New Water Service Department Field Operations become licensed by TCEQ as Water Distribution and/or Wastewater Collection Operators. This along with their on the job training enables the individual to identify SSOs. The Water Services Department also trains their Field Operations employees to identify and report any SSO whether they are collection system or on-site sewage facility issues. Each response is tracked in the City Works work order system.
MCM 2	2.6.2 Conduct necessary sewer system maintenance and repairs.	Met goal. Capital Improvement Rehabilitation projects continue, maintenance and repair on the sanitary sewer system are ongoing and done as needed.
MCM 2	2.6.3 Eliminate onsite sewage and gray water discharge that pose potential health and safety issues.	Met goal. City responds to and coordinates with Brazos County Health Department, TCEQ On-Site Sewage Facility Designated Representative, to eliminate nuisances caused by on-site sewage facilities.
MCM 2	2.6.4 Train staff in the tracking calls that may be nuisance issues relating to a sanitary sewer or gray water discharge.	Met goal. Water Services Department employees are trained on how to receive reports of nuisance issues through the work order system, CityWorks, or by means of proper reporting mechanisms. The four (4) water dispatchers and sixty-six (66) operations employees have been trained to use CityWorks.

MCM(s)	MEASURABLE GOAL(s)	EXPLAIN PROGRESS TOWARD GOAL OR HOW GOAL WAS ACHIEVED. IF GOAL WAS NOT ACCOMPLISHED, PLEASE EXPLAIN
MCM 2	2.7.1 Identify areas for outfall screening.	Met goal. The "Storm Drainage" Feature Dataset in the Public Works Department's GIS, which includes outfall locations, is routinely updated/revised using GIS for capital projects, new developments, facilities, and rehabilitated areas.
MCM 2	2.7.2 Regularly conduct dry weather screening in the identified areas.	Met goal. Outfalls are inspected by Drainage Maintenance Division personnel as routine maintenance is being performed.
MCM 2	2.8.1 Review and update the master plan for projects designed to eliminate sanitary sewer overflows.	Met goal. Capital Improvement Rehabilitation projects continue, maintenance, and repairs on the sanitary sewer system are ongoing and done as needed.
MCM 2	2.9.1 Provide a means for public reporting of illicit discharge or stormwater issues.	Met goal. The public education programs that the City of College Station participates in, contain information on how the public is to report illicit discharges. The City maintains a public hotline for illicit discharge/stormwater reporting.
MCM 2	2.9.2 Ensure staff knows the proper procedures to respond to hotline calls.	Met goal. Scheduled and completed in Year 1 (2014). Implementation was scheduled for Year 1.
MCM 2	2.9.3 Educate the public on normal and illicit discharge.	Met goal. The City's public education programs such as utility bill inserts (UBI), Brazos Clean Water (BCW) campaign, etc. The City provides information on how to identify and report various illicit discharges. Local municipal code also provides a list of allowable discharges.
MCM 2	2.9.4 Investigate illicit discharge reports made by the public.	Met goal. City trains employees to report illicit discharges by means of proper reporting mechanisms. Public-reported illicit discharges are investigated as high priority concerns. Twenty-two (22) public reports to the Water Services Department were investigated and resolved.
MCM 2	2.9.5 Utility Dispatch receives illicit discharge reports made by the public. WSD investigates and, if not a sanitary sewer overflow, transfers the report to the proper department.	Met goal. The City's public education programs provide information on how to report illicit discharges. Utility Dispatch (855 528 4278) is listed on Brazos Clean Water website, City of College Station Development Engineering web page and in the 2016 Annual Water Quality Report. Water Resources Coordinator includes this phone number in public presentations, brochures, etc.
MCM 2	2.10.1 Review and update City ordinance prohibiting illicit discharge.	Met goal. No changes were needed for the City Code of Ordinances pertaining to illicit discharge prohibitions in 2019.
MCM 3	3.1.1 Review and update ordinance to regulate construction activity.	Met goal. No changes were needed for the City Code of Ordinances pertaining to construction regulations in 2019.
MCM 3	3.2.1 Review construction plans for compliance with stormwater regulations and necessary erosion controls.	Met goal. Construction plans are reviewed and recorded in Planning and Development's electronic TRAKiT system. One hundred sixty-six (166) construction plans were reviewed and one hundred two (102) were approved and issued within 2019.

MCM(s)	MEASURABLE GOAL(s)	EXPLAIN PROGRESS TOWARD GOAL OR HOW GOAL WAS ACHIEVED. IF GOAL WAS NOT ACCOMPLISHED, PLEASE EXPLAIN
MCM 3	3.2.2 Maintain a record of reviewed and approved construction site plans.	Met goal. Construction plans are reviewed and recorded in Planning and Development's electronic TRAKiT system. All submittals: initial, revised and approved, are recorded in this system.
MCM 3	3.2.3 Report on the number of construction site plans reviewed annually.	Met goal. Construction plans are reviewed and recorded in Planning and Development's electronic TRAKiT system. One hundred sixty-six (166) construction plans were reviewed and one hundred two (102) were approved and issued within 2019.
MCM 3	3.3.1 Develop educational material instructing the public on how to report construction site violations.	Met goal. Educational materials are provided at each location and tracking of the amount distributed is approximately 550 pamphlets or brochures total.
MCM 3	3.3.2 Develop internal procedures for tracking and responding to public complaints.	Met goal. Scheduled and completed in Year 1 (2014). Implementation was scheduled for Year 1.
MCM 3	3.3.3 Investigate public complaints of construction sites.	Met goal. Public complaints about construction are recorded in Planning and Development's electronic TRAKiT system with inspection notes. In 2019, twelve (12) public complaints, regarding construction, were reported and investigated.
MCM 3	3.4.1 Train staff in inspection procedures.	Met goal. Training is ongoing through biweekly or monthly meetings. Total inspectors who received training was six (6). By working with experienced inspectors, new inspectors gain additional knowledge about the inspection process. Formal training was done by the Stormwater Coordinator and Stormwater Inspector. Experienced inspectors followed up with newer inspectors for field applications.
MCM 3	3.4.2 Develop a schedule for a construction site inspection.	Met goal. Scheduled and completed in Year 1 (2014). Implementation was scheduled for Year 1.
MCM 3	3.4.3 Provide inspection schedule to construction inspectors	Met goal. Scheduled and completed in Year 1 (2014). Implementation was scheduled for Year 1.
MCM 3	3.4.4 Inspect construction sites according to schedule.	Met goal. Inspectors are scheduled various inspections then inspection records are collected and databased through Planning and Development's electronic TRAKiT system.
MCM 3	3.4.5 Maintain inspection records	Met goal. Inspectors' inspection records are collected and databased in Planning and Development's electronic TRAKiT system. In 2019, zero (0) stormwater post construction, seven (7) stormwater warranty, one thousand (1000) stormwater daily inspections, and one hundred eighty-three (183) Final Occupancy - Drainage inspections were completed.
MCM 3	3.5.1 Issue enforcement actions to sites not found to be in compliance.	Met goal. Inspectors' inspection records are collected and databased in Planning and Development's electronic TRAKiT system. In 2019, one thousand (1000) stormwater daily inspections were completed with fifteen (15) failed inspections due to outstanding violations.

MCM(s)	MEASURABLE GOAL(s)	EXPLAIN PROGRESS TOWARD GOAL OR HOW GOAL WAS ACHIEVED. IF GOAL WAS NOT ACCOMPLISHED, PLEASE EXPLAIN
MCM 3	3.5.2 Conduct follow up inspections to ensure corrective action is taken.	Met goal. Inspectors' inspection records are collected and databased in Planning and Development's electronic TRAKiT system.
MCM 3	3.5.3 Maintain a record of inspection reports and enforcement actions from construction site stormwater inspections.	Met goal. Inspectors' inspection records are collected and databased in Planning and Development's electronic TRAKiT system. After an initial stormwater inspection violation, the inspector speaks to the on-site lead about compliance and possible steps of enforcement including stop work orders. City Development engineers also relate the message to the project owner and developer. Sites comply before legal enforcement is needed. In 2019, no site was taken through enforcement steps which involved the courts. However, the City did issue fifteen (15) Stormwater failure fees for non-compliance which prompted the site to come back into compliance to avoid any additional fees or project delays.
MCM 3	3.6.1 Maintain records of construction site compliance.	Met goal. Inspectors' inspection records are collected and databased in Planning and Development's electronic TRAKiT system.
MCM 4	4.1.1 Create and adopt guidelines to ensure long-term operation and maintenance of post-development structural and non-structural BMPs.	Met goal. No changes were made to the City Code of Ordinances pertaining to post development best management practices in 2019.
MCM 4	4.2.1 Review construction plans to determine compliance with post-construction runoff regulations.	Met goal. Construction plans are reviewed and recorded in Planning and Development's electronic TRAKiT system. One hundred sixty-six (166) construction plans were reviewed and one hundred two (102) were approved and issued within 2019.
MCM 4	4.2.2 Distribute post-construction design and permitting guidelines to the engineering community.	Met goal. Post construction guidelines are posted on the Planning and Development web page.
MCM 4	4.3.1 Train new staff and refresh current staff on post-construction runoff regulations and final inspection procedures.	Met goal. Training is ongoing through biweekly or monthly meetings. Total inspectors who received training was six (6). By working with experienced inspectors, new inspectors gain additional knowledge about the inspection process. Formal training was done by the Stormwater Coordinator and Stormwater Inspector. Experienced inspectors followed up with newer inspectors for field applications.
MCM 4	4.3.2 Perform final inspection of post-construction controls for compliance with regulations.	Met goal. Inspectors' inspection records are collected and databased in Planning and Development's electronic TRAKiT system. In 2019, zero (0) stormwater post construction, seven (7) stormwater warranty, one thousand (1000) stormwater daily inspections, and one hundred eighty-three (183) Final Occupancy - Drainage inspections were completed.

MCM(s)	MEASURABLE GOAL(s)	EXPLAIN PROGRESS TOWARD GOAL OR HOW GOAL WAS ACHIEVED. IF GOAL WAS NOT ACCOMPLISHED, PLEASE EXPLAIN
MCM 4	4.4.1 Issue enforcement actions to new development not in compliance with post-construction stormwater regulations.	Met goal. Inspectors' inspection records are collected and databased in Planning and Development's electronic TRAKiT system. Violations are noted in inspection records.
MCM 4	4.4.2 Maintain a record of enforcement actions taken.	Met goal. Inspectors' inspection records are collected and databased in Planning and Development's electronic TRAKiT system. After an initial stormwater inspection violation, the inspector speaks to the on-site lead about compliance and possible steps of enforcement including stop work orders. City Development engineers also relate the message to the project owner and developer. Sites comply before legal enforcement is needed. In 2019, no site was taken through enforcement steps which involved the courts. However, the City did issue fifteen (15) Stormwater failure fees for non-compliance which prompted the site to come back into compliance to avoid any additional fees or project delays.
MCM 4	4.5.1 Keep a log of City-owned structural stormwater controls.	Met goal. The "Storm Drainage" Feature Dataset in the Public Works Department's GIS is constantly being updated/revised for capital projects, new developments, facilities, and rehabilitated areas; TxDOT infrastructure was mapped by a contractor and is stored as Feature Dataset in the Department's GIS.
MCM 5	5.1.1 Maintain an inventory of City-owned industrial facilities.	Met goal. Maintained an inventory of City-owned industrial facilities.
MCM 5	5.1.2 Maintain current operating permits required by TCEQ.	Met goal. All required operating permits are current with TCEQ.
MCM 5	5.1.3 Maintain an inventory of City-owned and operated parking areas.	Met goal. Parking Lots have been mapped and stored as a Feature Class in the Public Works and Parks and Recreations Departments' GIS
MCM 5	5.1.4 Maintain an inventory of litter collection areas. (mowing areas, adopted streets)	Met goal. The "Landscape Maintenance" Feature Dataset in the Public Works Department's GIS contains the ROW, finish, contractor, maintained and drainage mowing areas as well as the location of trees and shrubs, the City is responsible for maintaining. The "Annual Agreement for Citywide Landscape Maintenance and Mowing" contract contains maps illustrating the locations of neighborhood parks, buildings, electrical sites, water/wastewater sites, and some right-of-way maintained by contractors. Public Works, PARD, and contract mowing crews pick up trash prior to mowing areas. Mowing and Adopt-A-Street performance measures are stored in our work order system and GIS. In 2019, seventeen (17) areas cleared of litter before landscaping and nearly seventy-three (73) miles of road were active in the Adopt-a-Street program.
MCM 5	5.1.5 Maintain an inventory of areas designated for herbicide and pesticide application.	Met goal. The "Landscape Maintenance" Feature Dataset in the Public Works Department's GIS contains the ROW, finish, contractor, maintained and drainage mowing areas as well as the

MCM(s)	MEASURABLE GOAL(s)	EXPLAIN PROGRESS TOWARD GOAL OR HOW GOAL WAS ACHIEVED. IF GOAL WAS NOT ACCOMPLISHED, PLEASE EXPLAIN
		location of trees and shrubs the City is responsible for maintaining. Parks and Recreation maintain a Feature Dataset containing park property listing with areas within the parks where herbicides and pesticides are applied. The “Annual Agreement for Citywide Landscape Maintenance and Mowing” contract contains maps illustrating the locations of neighborhood parks, buildings, electrical sites, water/wastewater sites, and some right-of-way maintained by contractors. Contract mowing areas, as well as the location of landscape and hardscape areas, requiring the application of pesticides and herbicides by contractors, are specified in the “Annual Agreement for Citywide Landscape Maintenance and Mowing” contract. The City of College Station treated over one thousand six hundred eighty-three (1683) curb miles with herbicide in the 2019 fiscal year.
MCM 5	5.1.6 Maintain an inventory of City-owned landscaping areas.	Met goal. The “Landscape Maintenance” Feature Dataset in the Public Works Department’s GIS contains the ROW, finish, and drainage mowing areas as well as the location of trees and shrubs Public Works is responsible for maintaining. Parks and Recreation update and maintain park property and facility listings that contain landscaping areas.
MCM 5	5.1.7 Maintain an inventory of City-owned vehicles.	Met goal. Inventory is maintained and updated through the fleet work management system.
MCM 5	5.1.8 Maintain an inventory of Public Works facilities that require a Spill Prevention Control and Countermeasures Plan.	Met goal. Public Works maintains an SPCC plan for the operations center which is currently under review to meet federal compliance.
MCM 5	5.1.9 Maintain a map of City-owned facilities and permanent stormwater controls.	Met goal. The “Storm Drainage” Feature Dataset in the Public Works Department’s GIS is constantly being updated/revised for capital projects, new developments, facilities, and rehabilitated areas; TxDOT infrastructure was mapped by a contractor and is stored as Feature Dataset in the Department’s GIS.
MCM 5	5.1.10 Maintain an inventory of Water Services facilities that require a Spill Prevention Control and Countermeasures Plan.	Met goal. Six (6) WSD facilities require an SPCC Plan: Carters Creek WWTP, Lick Creek WWTP, Dowling Road Pump Station, and Sandy Point Pump Station, Water Well #5 and Water Well #6. All were revised on June 7, 2019 and remain in compliance.
MCM 5	5.2.1 Determine industrial stormwater permit requirements for City-owned facilities.	Met goal. Scheduled and completed in Year 1 (2014). Implementation was scheduled for Year 1.
MCM 5	5.2.2 Maintains industrial stormwater permits required by TCEQ.	Met goal. Both Carters Creek and Lick Creek WWTPs are current and in compliance with their TCEQ stormwater permits. With TCEQ approval, both facilities are determined to be functioning at state level compliance.

MCM(s)	MEASURABLE GOAL(s)	EXPLAIN PROGRESS TOWARD GOAL OR HOW GOAL WAS ACHIEVED. IF GOAL WAS NOT ACCOMPLISHED, PLEASE EXPLAIN
MCM 5	5.3.1 Train staff in good housekeeping and pollution prevention practices.	Met goal. Most staff received stormwater training through monthly staff monthly meetings and safety meetings or ongoing on-the-job training. Water Services Department completed annual training in February 2019 with sixty-eight (68) employees. Public Works completed annual training in February 2019. Planning and Development Services inspectors completed annual training in July 2019.
MCM 5	5.4.1 Identify pollutants that could be discharged from operations and maintenance activities.	Met goal. Potential pollutants have been identified in Public Works Operations facilities. Public Work sites are routinely checked, and procedures are in place, in case of a spill event.
MCM 5	5.4.2 Evaluate operations and maintenance procedures to minimize the discharge of pollutants.	Met goal. Potential pollutants have been identified in Public Works Operations facilities. Public Work sites are routinely checked, and procedures are in place, in case of a spill event.
MCM 5	5.4.3 Regularly inspect problem areas and high-risk facilities for pollutant discharge.	Goal not met. Currently, no perimeter check inspection documentation can be found on file for calendar year 2019. The position performing this duty became vacant in June of 2019. It should be noted that the City does have Capital Improvement Projects in transition to increase compliance efforts. Projects include a new secondary containment for an out-of-service vertical asphalt tank, fleet and wash rack upgrades, and removal/replacement of a fuel terminal. Perimeter checks resumed Jan 2020.
MCM 5	5.5.1 Apply herbicides and pesticides according to manufacturer recommendations and any applicable regulations.	Met goal. Pesticides and herbicides are only applied by licensed applicators or by personnel filing under the Texas Department of Agriculture's Q570A Direct Supervision Affidavit. City staff is provided with on-the-job training for proper handling and application procedures and certifications maintained for those staff with pesticide and herbicide applicators licenses.
MCM 5	5.6.1 Identify areas where catch basins, surface inlets, or storm drain manholes should be cleaned.	Met goal. The "Storm Drainage" Feature Dataset in the Public Works Department's GIS is constantly being updated/revised for capital projects, new developments, facilities, and rehabilitated areas; TxDOT infrastructure was mapped by a contractor and is stored as Feature Dataset in the Department's GIS.
MCM 5	5.6.2 Implement an inlet and storm drain cleaning program according to the developed inspection schedule.	Met goal. Drainage infrastructure in subdivisions developed pre-2007 are continuously evaluated to identify areas in need of stenciling. Over 1,800 markers have been applied to inlets since May 2012 as part of the Public Works Department's "Only Rain Down the Drain" stormwater quality and inlet protection program. As of 2019, all pre-2007 curb inlets have been identified with "No Dumping, Drains to River" inlet markers. All new development is required to install storm inlet inlays per the Unified Design Guidelines.
MCM 5	5.7.1 Implement street sweeping according to the existing schedule.	Met goal. TxDOT and City-maintained streets were swept in a twelve (12) weeks rotation schedule with certain streets being swept with more frequency.

MCM(s)	MEASURABLE GOAL(s)	EXPLAIN PROGRESS TOWARD GOAL OR HOW GOAL WAS ACHIEVED. IF GOAL WAS NOT ACCOMPLISHED, PLEASE EXPLAIN
MCM 5	5.7.2 Implement sweeping of City-owned parking lots.	Met goal. City-maintained parking lots were swept annually or as needed.
MCM 5	5.7.3 Assess current roadway activities to determine if alternate practices would benefit stormwater quality.	Met goal. City streets are maintained by traditional overlays, thin overlays, micro-surfacing, fog seals, edge line level-ups, and crack sealing serve as the primary methods for treating asphalt distresses. The City no longer utilizes chip sealing.
MCM 5	5.8.1 Identify facilities that require Spill Prevention Control and Countermeasures (SPCC) plans.	Met goal. Updated and maintained property and facility listings identifying areas that require SPCC plans.
MCM 5	5.8.2 Maintain SPCC plans in identified facilities.	Met goal. Printed materials are provided at specific locations to be available for easy reference.
MCM 5	5.8.3 Maintains a Spill Prevention Control and Countermeasures Plan for WSD facilities.	Met goal. Six (6) WSD facilities require an SPCC Plan: Carters Creek WWTP, Lick Creek WWTP, Dowling Road Pump Station, and Sandy Point Pump Station, Water Well #5 and Water Well #6. All were revised on June 7 2019 and remain in compliance.
MCM 5	5.9.1 Wash City vehicles in approved areas to prevent wash water from entering the storm drains.	Met goal. Public Works vehicles are washed over the 'wash rack' located in the Public Works' fleet yard. Water Services and Electric utilize the wash rack located in the Electric yard.
MCM 5	5.9.2 Conduct routine inspection on all vehicles according to manufacturer specifications, also inspecting the vehicle for the presence of fluid leaks.	Met goal. Daily inspections and checks are done on all City-owned vehicles.

C. Stormwater Data Summary

Provide a summary of all information used, including any lab results (if sampling was conducted) to assess the success of the SWMP at reducing the discharge of pollutants to the MEP. For example, did the MS4 conduct visual inspections, clean the inlets, look for illicit discharge, clean streets, look for flow during dry weather, etc.?

The City of College Station does not collect analytical data but utilizes visual observations. City outfalls are inspected by Drainage Maintenance Division personnel as routine maintenance is being performed. This allows for detection of possible issues including sanitary sewer leaks, illicit discharging or illegal dumping. The City also sweeps TxDOT and city-owned streets every twelve (12) weeks and city-owned parking lots once a year or as necessary.

The City of College Station did not conduct any sampling but recently began utilizing select waterway data collected by the volunteer group, Brazos Valley Master Naturalist. Data of sampling can be found on the Texas Stream Team website for sites 81263, 81262 and 81264. Results from individual sites are used to monitor creek health as well as possible illicit discharges or SSOs.

D. Impaired Waterbodies

1. Identify whether an impaired water within the permitted area was added to the latest EPA-approved 303(d) list or the Texas Integrated Report of Surface Water Quality for CWA Sections 305(b) and 303(d). List any newly identified impaired waters below by including the name of the water body and the cause of impairment.

While the impaired bodies within College Station remain, the City would like TCEQ to note the following. The Navasota River and several tributaries were first listed as impaired on the 2002 Texas Integrated Report (Texas 303(d)List) for elevated E.coli concentrations. To address this need, watershed stakeholders, including the City of College Station, organized to develop the Navasota River Below Lake Limestone Water Shed Protection Plan. This plan can be found as Texas Water Resources Institute Technical Report 497.

2. If applicable, explain below any activities taken to address the discharge to impaired waterbodies, including any sampling results and a summary of the small MS4's BMPs used to address the pollutant of concern.

The City of College Station did not conduct any sampling but utilized waterway data collected by the volunteer group, Brazos Valley Master Naturalist. Data of sampling can be found on the Texas Stream Team website for sites 81263, 81262 and 81264. Results from individual sites are used to monitor creek health as well as possible illicit discharges or SSOs.

Additionally, visual monitoring was used to assess overall stream health. Best management practices were implemented to increase public awareness of bacteria pollution and ways to reduce it as well as publicizing the hotline number for citizens to report illegal discharge/dumping throughout the City. A total of eighty-five (85) volunteer groups actively participating in City of College Station's Adopt-A-Roadway & Adopt-A-Greenway projects. Adoption projects reduced litter entering nearby waterways. The City continues to recruit community volunteers for the Public Works Department's "Only Rain Down the Drain" stormwater quality and inlet protection program.

Water Services crews conducted video scoping in department chosen pipelines in various areas throughout City to detect possible sanitary sewer leaks or problems. Corrected actions and improvements reduced areas susceptible to overflows.

3. Describe the implementation of targeted controls if the small MS4 discharges to an impaired water body with an approved TMDL.

Targeted controls focused on reducing the pollution that can enter local waterways. This was primarily achieved through publicizing outlets to encourage public reporting of illegal dumping and discharging, conducting cleanups of litter along roads and greenways highlighted as high trafficked or high in pollution and repairing sanitary sewer pipes to eliminate sanitary sewer overflow and leaks

4. Report the benchmark identified by the MS4 and assessment activities:

Benchmark Parameter	Benchmark Value	Description of additional sampling or other assessment activities	Year(s) conducted
E. Coli	Criterion = 126 MPN/ 100mL	No additional assessment activities by the City of College Station occurred this year	2019

5. Provide an analysis of how the selected BMPs will be effective in contributing to achieving the benchmark:

Benchmark Parameter	Selected BMP	Contribution to achieving Benchmark
<i>E. Coli</i>	Adopt-A-Street / Adopt-A-Greenway	Remove litter items from roads and greenways that may enter water bodies and increase E. coli amounts.
<i>E. Coli</i>	Eliminate sanitary sewer overflow	Waste Infrastructure Capital Improvement Projects continue. Repair and maintenance of sanitary sewer lines reduce chances of leaks or overflow entering waterbodies.
<i>E. Coli</i>	Public reporting of illicit discharge/illegal dumping	The public can report areas where illicit discharges or illegal dumping are occurring that may otherwise go unnoticed.
<i>E. Coli</i>	Public Education	Educate the public on pollutants of concern and how to reduce runoff pollution.

6. If applicable, report on focused BMPs to address impairment for bacteria:

Description of bacteria-focused BMP	Comments/Discussion
Volunteer Monitoring	Volunteers participating with the Texas Stream Team assist the City with detecting illicit discharges, visual health of waterways and provide regular E.Coli counts at designated areas to evaluate the efforts of reducing impairment.
Educational Materials & Outreach	In 2019, nine (9) Water Service facility tours were conducted reaching five hundred ninety-five (595) people. Public education is furthered at tour events as residents are educated on FOG, runoff pollution, and related subjects.
Educational Materials & Outreach	In 2019, seventy-seven (77) irrigation checkups were directed and three (3) irrigation efficiency workshops were held by WSD. Participants in these programs learned about controlling irrigation runoff and what items should be kept out of both sanitary and storm sewer systems.

Description of bacteria-focused BMP	Comments/Discussion
Elimination of Sewer System and Gray Water Discharge / Eliminate Sanitary Sewer Overflow	Waste Infrastructure Capital Improvement Projects continue. Repair and maintenance of sanitary sewer lines reduce chances of leaks or overflow entering waterbodies.

7. Assess the progress to determine BMP's effectiveness in achieving the benchmark.

Benchmark Indicator	Description/Comments
Increase in public reporting of illicit discharges	Volunteer monitoring has increased citizen awareness of potential pollutants in waterways. Both participating and non-participating local environmental groups have increased public reporting regarding possible illicit discharges. Four (22) illicit discharge findings were reported and investigated in 2019.
Increase in educational materials and opportunities	Educational opportunities for residents and business owners has increased awareness of illicit discharges, illegal dumping, and potential pollutants as well as steps that can reduce pollution in waterways. College Station reached citizens through multiple ways included but not limited to: three (3) Utility Bill Inserts, Brazos Clean Water stormwater website, three (3) articles in the city distributed developer newsletter, free educational materials at city facilities and informational flyers handed out at events, nine (9) Water Service facility tours reaching five hundred ninety five (595) people, seventy seven (77) irrigation checkups, and three (3) irrigation efficiency workshops.
Reductions in sanitary sewer overflows (SSOs)	Wastewater Infrastructure Capital Improvement Projects continue. The City conducted repairs to sanitary sewer pipes to reduce potential SSOs.

E. Stormwater Activities

Describe activities planned for the next reporting year:

MCM(s)	BMP	Stormwater Activity	Description/Comments
MCM 1	1.1 Public Notice & Input for SWMP Development & Annual Report	<ol style="list-style-type: none"> 1. Provide the date of the MS4 general permit & SWMP renewal publication and affidavit. 2. Provide the date of draft SWMP publication to the City's webpage, cstx.gov; as well as the viewing traffic count. 3. Provide the date of the approved SWMP publication to the City's webpage, cstx.gov; as well as the viewing traffic count. 	This BMP was created to adhere to the state and local public notice requirements, as well as allowing for citizens to add input into the development and execution of the program. Additionally, the public will have the opportunity to review the annual report and comment on those findings. A notice for the draft SWMP will be published in a local newspaper, as well as published on the City of College Station website: cstx.gov . The notice will be accompanied by an email address, presenting the public the opportunity to comment on the submitted, draft program. Once the City of College Station receives acceptance of the proposed SWMP, the approved program will be posted to the cstx.gov website for general viewing and accompanied by an email

MCM(s)	BMP	Stormwater Activity	Description/Comments
MCM 2	2.10 Household Hazardous Waste (HHW) Program	<ol style="list-style-type: none"> 1. Compose an HHW article for distribution. 2. Provide the date of each bi-annual HHW Event. 	Reduction of household hazardous waste (HHW) management will be promoted through the distribution of educational materials discouraging improper disposal, including pouring materials down storm drains and the associated harmful effects. The City of College Station will construct an educational article to be distributed in utility bill inserts. Citizens will have the opportunity to dispose of household hazardous waste in a safe manner at the bi-annual HHW free disposal event, available to those living within the Brazos Valley Council of Governments service area: Brazos, Burleson, Grimes, Lee, Leon, Madison, and Robertson counties. This event is supported by the cities of Bryan and College Station, and in collaboration with the Brazos Valley Solid Waste Management Agency. An advertisement for this event will be distributed on utility bill inserts and the cstx.gov webpage.
MCM 2	2.11 Fats, Oils, & Grease (FOG) Program	<ol style="list-style-type: none"> 1. Provide the review date and any subsequent amendments to the grease ordinance. 2. Provide the total number of FOG educational letters mailed each permit year 	Fats, oils, and grease (FOG) merge in our sewers to form solid, immovable blockages known as fatbergs. Fatbergs damage infrastructure and equipment and pose health risks to humans and the environment. The FOG Program will promote proper disposal practices, while simultaneously discouraging the dumping of FOGs in the storm system. To ensure adequate implementation, the City will review and amend if necessary, the Grease Trap Ordinance (Article IV. - Solid Waste Collection and Disposal; Sec. 40-464) on an annual basis. To encourage proper disposal practices as well as an educational opportunity, the City will distribute 25 letters a month reminding businesses of the importance of handling practices, maintenance, and proper disposal of FOGs.
MCM 2	2.12 Litter Collection Program	<ol style="list-style-type: none"> 1. Provide the garbage, bulk and brush, and recycling collection schedules for each permit year. We can also provide the total tonnages for each and diversion rates. 	Improperly disposed litter is a major contributor of floatables in water bodies. Floatables prevent beneficial uses, degrade habitats and harm wildlife, and have the potential to endanger human health. The City of College Station provides collection services for various floatables, including regular garbage, bulk and brush, and recyclables, to ensure the MS4 system does not become a conduit for trash. The City maintains a weekly collection schedule for regular garbage, bulk, and brush collection; as well as a bi-weekly schedule for recyclables.
MCM 3	3.8 Operator Education Program	<ol style="list-style-type: none"> 1. Facilitate the bi-annual workshop for operators; provide the date of each workshop and the number of attendees. 	The City of College Station provides semi-annual stormwater workshops for developers, contractors, and homebuilders; as well as publishes a quarterly newsletter targeting the construction industry on reoccurring infractions during that quarter. This allows

MCM(s)	BMP	Stormwater Activity	Description/Comments
		2. Compose quarterly articles related to stormwater activities to be published in the City's developer newsletter.	those in the construction industry to familiarize themselves with stormwater regulations and the entities inspecting and regulating their works. Hosting workshops gives those in the industry the opportunity to educate themselves on newly published or drafted permit changes, as well as to ask questions on regulations that may not be clear in permit language.
MCM 4	4.6 Maintenance Plans for Structural Controls	<p>1. Provide the date of review for each applicable ordinance, as well as any amendments or new ordinance adoptions to aid with compliance for this BMP.</p> <p>2. Conduct internal stakeholder meetings to discuss the creation and implementation of this BMP.</p>	Because the City does not perform maintenance on private stormwater controls, the City is required to ensure long-term operation and maintenance of public and private structural stormwater controls by means of requiring owners or operators of new development or redevelopment projects to file maintenance plans in the real property records in Brazos County. The owner or operator is required to document maintenance and operations activities and retain the plan on site or at their respective offices. The City of College Station will hold an internal stakeholder meeting during the first permit year to review current ordinances addressing structural controls; maintenance and operations requirements; the development of an inspection program; data acquisition and enforcement procedures; as well as how to construct a repository for maintenance agreements. The remaining permit years will be utilized to draft the program and any needed legal mechanisms to ensure success, as well as evaluate the long-term operation and maintenance of current structural controls in the city limits.
MCM 5	5.6 SOPs for High Priority Facilities	<p>1. Provide the total number of completed SOPs and the total number of 'high priority facilities.'</p> <p>2. Provide the total number of facilities utilizing a SWPPP as their stormwater management SOP.</p>	Establishing guidelines and standards for municipal facilities and operations The City of College Station will utilize site specific SWPPPs required for City-owned TXR050000 Multi-Sector General Permit facilities as their respective SOP; and will develop facility specific stormwater management standard operating procedures (SOPs) for high priority facilities not permitted under the TXR050000 Multi-Sector General Permit
MCM 5	5.7 Pollution Prevention & Good Housekeeping Inspection Program	Provide a final draft to internal stakeholders of inspection program's procedures and methodology.	The City of College Station will develop and implement a pollution prevention and good housekeeping inspection program for all city-owned high priority facilities. The results of inspections and observations will be documented and retained according to the permit's recordkeeping requirements.

F. SWMP Modifications

1. The SWMP and MCM implementation procedures are reviewed each year.

☒ Yes ☐ No

2. Changes have been made or are proposed to the SWMP since the NOI or the last annual report, including changes in response to TCEQ's review.

☒ Yes ☐ No

If "Yes," report on changes made to measurable goals and BMPs:

MCM(s)	Measurable Goal(s) or BMP(s)	Implemented or Proposed Changes (Submit NOC as needed)
MCM 1	1.1 Public Notice & Input for SWMP Development & Annual Reporting	<p>Proposed as an additional BMP for the next 5-year permit term.</p> <p>This BMP was created to adhere to the state and local public notice requirements, as well as allowing for citizens to add input into the development and execution of the program. Additionally, the public will have the opportunity to review the annual report and comment on those findings. A notice for the draft SWMP will be published in a local newspaper, as well as published on the City of College Station website: cstx.gov. The notice will be accompanied by an email address, presenting the public the opportunity to comment on the submitted, draft program. Once the City of College Station receives acceptance of the proposed SWMP, the approved program will be posted to the cstx.gov website for general viewing and accompanied by an email address allowing for the public to comment throughout the remainder of the permit period. The SWMP Annual Report, respective of each permit year, will be published to the cstx.gov webpage for public viewing with an accompanied email address for response to comments.</p>
MCM 1	1.4 Interagency Cooperation: Brazos Clean Water	<p>Removal of BMP.</p> <p>Brazos Clean Water (BCW) Committee worked together on team efforts to educate the public and outreach for the entire county. BCW maintained an organizational webpage, but due to inclement weather, the organization's largest event has been cancelled for (2) consecutive years. BCW has since been dissolved due to lack of participation. With the new initiative of the Navasota River (Below Lake Limestone) Watershed stakeholder group, the BCW organization has moved towards a 'watershed' or regional approach to water quality instead of individual stakeholders with a few impaired stream segments.</p>
MCM 1	1.5 Only Rain Down the Drain: Storm Drain Stenciling	<p>Removal of BMP.</p> <p>As of 2019, all pre-2007 curb inlets (1,800+) have been identified with "No Dumping, Drains to River" inlet markers. All new development is required to install storm inlet inlays per the Unified Design Guidelines. We would like to utilize our volunteer groups for other stormwater events and reevaluate this BMP at the next 5-year permit term; 2025-2028.</p>

MCM(s)	Measurable Goal(s) or BMP(s)	Implemented or Proposed Changes (Submit NOC as needed)
MCM 2	2.10 Household Hazardous Waste (HHW) Event	<p>Proposed as an additional BMP for the next 5-year permit term.</p> <p>Reduction of household hazardous waste (HHW) management will be promoted through the distribution of educational materials discouraging improper disposal, including pouring materials down storm drains and the associated harmful effects. The City of College Station will construct an educational article to be distributed in utility bill inserts. Citizens will have the opportunity to dispose of household hazardous waste in a safe manner at the bi-annual HHW free disposal event, available to those living within the Brazos Valley Council of Governments service area: Brazos, Burleson, Grimes, Lee, Leon, Madison, and Robertson counties. This event is supported by the cities of Bryan and College Station, and in collaboration with the Brazos Valley Solid Waste Management Agency. An advertisement for this event will be distributed on utility bill inserts and the cstx.gov webpage.</p>
MCM 2	2.11 Fats, Oils, & Grease (FOG) Program	<p>Proposed as an additional BMP for the next 5-year permit term.</p> <p>Fats, oils, and grease (FOG) merge in our sewers to form solid, immovable blockages known as fatbergs. Fatbergs damage infrastructure and equipment and pose health risks to humans and the environment. The FOG Program will promote proper disposal practices, while simultaneously discouraging the dumping of FOGs in the storm system. To ensure adequate implementation, the City will review and amend if necessary, the Grease Trap Ordinance (Article IV. - Solid Waste Collection and Disposal; Sec. 40-464) on an annual basis. To encourage proper disposal practices as well as an educational opportunity, the City will distribute 25 letters a month reminding businesses of the importance of handling practices, maintenance, and proper disposal of FOGs.</p>
MCM 2	2.12 Litter Collection Program	<p>Proposed as an additional BMP for the next 5-year permit term.</p> <p>Improperly disposed litter is a major contributor of floatables in water bodies. Floatables prevent beneficial uses, degrade habitats and harm wildlife, and have the potential to endanger human health. The City of College Station provides collection services for various floatables, including regular garbage, bulk and brush, and recyclables, to ensure the MS4 system does not become a conduit for trash. The City maintains a weekly collection schedule for regular garbage, bulk, and brush collection; as well as a bi-weekly schedule for recyclables.</p>
MCM 3	3.8 Operator Education Program	<p>Proposed as an additional BMP for the next 5-year permit term.</p> <p>The City of College Station provides semi-annual stormwater workshops for developers, contractors, and homebuilders; as well as publishes a quarterly newsletter targeting the construction industry on reoccurring infractions during that quarter. This allows those in the construction industry to familiarize themselves with stormwater regulations and the entities inspecting and regulating their works. Hosting workshops gives those in the industry the opportunity to educate themselves on newly published or</p>

MCM(s)	Measurable Goal(s) or BMP(s)	Implemented or Proposed Changes (Submit NOC as needed)
		drafted permit changes, as well as to ask questions on regulations that may not be clear in permit language
MCM 4	4.6 Maintenance Plans for Structural Controls	<p>Proposed as an additional BMP for the next 5-year permit term.</p> <p>Because the City does not perform maintenance on private stormwater controls, the City is required to ensure long-term operation and maintenance of public and private structural stormwater controls by means of requiring owners or operators of new development or redevelopment projects to file maintenance plans in the real property records in Brazos County. The owner or operator is required to document maintenance and operations activities and retain the plan on site or at their respective offices. The City of College Station will hold an internal stakeholder meeting during the first permit year to review current ordinances addressing structural controls; maintenance and operations requirements; the development of an inspection program; data acquisition and enforcement procedures; as well as how to construct a repository for maintenance agreements. The remaining permit years will be utilized to draft the program and any needed legal mechanisms to ensure success, as well as evaluate the long-term operation and maintenance of current structural controls in the city limits.</p>
MCM 5	5.6 SOPs for High Priority Facilities	<p>Proposed as an additional BMP for the next 5-year permit term.</p> <p>Establishing guidelines and standards for municipal facilities and operations. The City of College Station will utilize site specific SWPPPs required for City-owned TXR050000 Multi-Sector General Permit facilities as their respective SOP; and will develop facility specific stormwater management standard operating procedures (SOPs) for high priority facilities not permitted under the TXR050000 Multi-Sector General Permit.</p>
MCM 5	5.7 Pollution Prevention & Good Housekeeping Inspection Program	<p>Proposed as an additional BMP for the next 5-year permit term.</p> <p>The City of College Station will develop and implement a pollution prevention and good housekeeping inspection program for all city-owned high priority facilities. The results of inspections and observations will be documented and retained according to the permit's recordkeeping requirements.</p>

3. Explain additional changes or proposed changes not previously mentioned (i.e. dates, contacts, procedures, annexation of land, etc.).

All measurable goals within each BMP carried over from the previous permit term (2014-2018) have been rewritten to meet the remand rule providing TCEQ with clear and measurable data on each annual report.

The City of College Station will be removing the Burton and Carters Creek TMDL and subsequent I-Plan, while replacing it with a regional or watershed plan for the Navasota River (Below Lake Limestone) Watershed TMDL and I-Plan. The Navasota River (Below Lake Limestone) Watershed TMDL and I-Plan was

approved by TCEQ on August 28, 2019, after the City's NOI and SWMP was submitted for compliance with the newly published MS4 General Permit (2020-2024).

G. Additional BMPs for TMDLs and I-Plans

Provide a description and schedule for implementation of additional BMPs that may be necessary, based on monitoring results, to ensure compliance with applicable TMDLs and implementation plans.

BMP	Description	Implementation Schedule	Status Date (completed, in progress, not started)
MM 1.1 Review of Category 4 & 5 Waterbodies	The City of College Station is required to check the EPA 303(d) list or the Texas Integrated Report of Surface Water Quality for CWA Sections 305(b) and 303(d) which lists the category 4 and 5 waterbodies, as not meeting Texas Surface Water Quality Standards. Within (2) years following the approval date of the newly list(s) of impaired waters, the City of College Station is required to comply with the requirements of Part II.D.4.(b) of the MS4 permit, and will identify any newly listed waters in the annual report and SWMP.	January 1, 2020	December 31, 2024
1.4 Pet Waste Management	The purpose of this management measure is to reduce bacteria loadings associated with pets through proper pet waste management. Pets were identified as the second largest potential E. coli source in the watershed. If not managed properly, pet waste and the E. coli it contains can be transported to waterbodies during rainfall or irrigation events that produce runoff. Properly disposing of pet waste into a trash can is a simple and effective way of reducing E. coli loads in the watershed. This management measure includes installing pet waste stations in parks and other public areas to facilitate increased collection and proper disposal of dog waste and providing educational resources to homeowners through their utility bills and other relevant avenues.	January 1, 2020	December 31, 2024
1.5 Inflow & Infiltration	The purpose of this management measure is to work with WWTFs in the watershed to continue and expand system inspections to identify system I&I problem areas. I&I is surface runoff that enters the sewer collection system through manhole covers, sewer cleanouts, damaged pipes, and faulty connections. As runoff enters the sewer collection system, there is increased potential for collection system and WWTF overload. This can result in unauthorized discharge of raw sewage or have a dilution effect that decreases	January 1, 2020	December 31, 2024

BMP	Description	Implementation Schedule	Status Date (completed, in progress, not started)
	treatment efficiency. The City of College Station will conduct conveyance testing to identify infrastructure failures in need of repairs or replacements and prioritize replacements as funds allow. The City of College Station will also deliver educational materials as appropriate to homeowners about I&I issues and the effect of malfunctions with their utility bills.		

H. Additional Information

1. Is the permittee relying on another entity to satisfy any permit obligations?

☒ Yes ☐ No

If "Yes," provide the name(s) of other entities and an explanation of their responsibilities (add more spaces or pages if needed).

Name and Explanation: TWRI leads the TMDL I-Plan which is included in the City of College Station's MS4 for its local impaired water bodies. TWRI representative reports TMDL data to I-Plan team which consists of several local entities. The team then assesses area affected and possible sources. Based from location, members of the team may need to assess their responsible area for possible leaks or causes.

Name and Explanation: Texas Stream Team/ Brazos Valley Master Naturalists. The City of College Station and BVMN are currently working together in water monitoring. BVMN does the field work of collecting samples and reporting the data to Texas Stream Team. The City of College Station then evaluates information for trouble spots and possible causes.

Name and Explanation: Brazos Clean Water. The group consists of interagency cooperation of the City of Bryan, Texas A&M, TxDOT, City of College Station and Brazos County to maintain activity in the Brazos Clean Water group. The group's purpose is to educate all ages of the general public in clean water practices, pollution, and practices to prevent pollution in local waterways related to Brazos County.

2.a. Is the permittee part of a group sharing a SWMP with other entities?

☐ Yes ☒ No

2.b. If "yes," is this a system-wide annual report including information for all permittees?

☐ Yes ☐ No ☒ Not Applicable

If "Yes," list all associated authorization numbers, permittee names, and SWMP responsibilities of each member (add additional spaces or pages if needed):

Authorization Number: _____

Permittee: _____

I. Construction Activities

1. The number of construction activities that occurred in the jurisdictional area of the MS4 (Large and Small Site Notices submitted by construction site operators):

58

2a. Does the permittee utilize the optional seventh MCM related to construction?

 Yes X No

2b. If "yes," then provide the following information for this permit year:

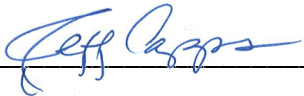
The number of municipal construction activities authorized under this general permit	Not Applicable
The total number of acres disturbed for municipal construction projects	Not Applicable

J. Certification

If this is this a system-wide annual report including information for all permittees, each permittee shall sign and certify the annual report in accordance with 30 TAC §305.128 (relating to Signatories to Reports).

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name (printed): Jeff Capps Title: Interim City Manager

Signature:  Date: 4/29/2020

Name of MS4 City of College Station