

Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number TXR040000

A. General Information

Authorization Number: TXR0400017

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

Annual Reporting Year Option Selected by MS4:

Calendar Year: X

Permit Year: 2022

Fiscal Year: _____ Last day of fiscal year: (_____)

Reporting period beginning date: (month/date/year) January 1, 2022

Reporting period end date: (month/date/year) December 31, 2022

MS4 Operator Level: 2 Name of MS4: City of Keller

Contact Name: Tyler Spence Telephone Number: 817-743-4094

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

Region the annual report was submitted to: TCEQ Region 4

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)

	Yes	No	Explain
Permittee is currently in compliance with the SWMP as submitted to and approved by the TCEQ.	X		Pending the review and approval of SWMP renewal submitted prior to the July 23, 2019 deadline.
Permittee is currently in compliance with recordkeeping and reporting requirements.	X		Documentation is maintained for goals that are met. Partially met goals or goals not met do not include documentation unless stated otherwise in Section 4.
Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.).	X		The City MS4 discharges are applicable and eligible for coverage under TXR040017. Receiving surface waters are not impaired; however, the City is subject to TMDLs for bacteria and legacy pollutants via the watershed approach. Edwards Aquifer limitations are not applicable. As of 9/1/2021, the City's Compliance History classification is rated "High."
Permittee conducted an annual review of its SWMP in conjunction with preparation of the annual report	X		All BMPs were assessed by all responsible departments during the annual report preparation. It was determined each BMP is appropriate for implementation.

2. Provide a general assessment of the appropriateness of the selected BMPs. You may use the table below to meet this requirement (**see Example 1 in instructions**):

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
1	BMP 1 Distribute Educational Material	Pending - The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process.
1, 2, 3	BMP 2 Stormwater Reporting By Public	Pending - The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process.
1	BMP 3 Public Involvement Opportunities	Pending - The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process.
1	BMP 4 Storm Sewer System Map and Facility Inventory	Pending - The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process.
2	BMP 5 Illicit Discharge and Spill Inspection, Investigation, and Response	Pending - The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process.
2	BMP 6 OSSF Procedures	Pending - The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process.
3 & 4	BMP 7 Plan Review	Pending - The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process.
2 & 3	BMP 8 Construction Site Inspection and Enforcement	Pending - The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process.
4	BMP 9 Structural Control Maintenance, Inspection, and Enforcement	Pending - The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process.
5	BMP 10 Maintenance Contractor Oversight	Pending - The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process.
5	BMP 11 Municipal Operations and Maintenance Activity	Pending - The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process.

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
5	BMP 12 Municipal Operations Inspection Program and Procedures	Pending - The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process.
5	BMP 13 Disposal of Collected Waste	Pending - The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process.
5	BMP 14 Street Sweeping (Roadway Pollution Prevention)	Pending - The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process.
2, 3, & 5	BMP 15 Staff Training	Pending - The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process.
2, 3, & 4	BMP 16 Stormwater Quality Ordinances	Pending - The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process.

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. Use the table below to meet this requirement (see **Example 2 in instructions**):

MCM	BMP	Parameter	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
1	BMP 1 Distribute Educational Material	Educational Material Distributed	9 2 4 3 45,901 22,394 213	Stormwater Topics Bacteria Topics Methods Audiences Stormwater Material Distributed Bacteria Material Distributed Page views	Yes. Educates the public of hazards associated with illegal discharges/improper disposal of waste and about the impact that stormwater discharges have on local waterways.
1, 2, & 3	BMP 2 Stormwater Reporting by Public	Report Submittals	1 1	Reporting mechanism Reports received	Yes. Procedures to facilitate public reporting of stormwater quality concerns.
1	BMP 3 Public Involvement Opportunities	Public involvement programs and events	3 4 40 452 187	Opportunities Target Audiences Adopted streets Participants Bags of trash collected (Park Cleanup)	Yes. Educates the public of hazards associated with illegal discharges/ improper disposal of waste and about the impact that stormwater discharges have on local waterways.
1	BMP 4 Storm Sewer System Map and Facility Inventory	MS4 map evaluation	374 0 9	Stormwater outfalls New Stormwater outfalls City Owned Facilities	Yes. Maintains current mapping and inventory files regarding the MS4 system and updates annually.

MCM	BMP	Parameter	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
2	BMP 5 Illicit Discharge and Spill Inspection, Investigation, and Response	Discharge/spill response	32 10 2 10 0 421 154,187 11,949	Spill response events Discharges confirmed Spills requiring TCEQ notification Enforcement activities Sanitary sewer overflows Sanitary sewer work orders Linear feet cleaned Linear feet inspected	Yes. Procedure to promptly address detected discharge of pollutants.
2	BMP 6 OSSF Procedures	Tarrant Co. Health Department (TCHD) Log	1876 16 0 0 0	Known OSSFs New/Newly discovered OSSFs Known failing OSSFs referred OSSF inspections Delinquent OSSF inspection reports	Yes. OSSF complaints are referred to TCHD for inspection and correction, as needed.
3 & 4	BMP 7 Plan Review	Construction and post-construction plan reviews	16	Reviews	Yes. Procedure to evaluate proper design of pollutant control systems.
2 & 3	BMP 8 Construction Site Inspection and Enforcement	Construction site enforcement	6,515 12	Inspection reports Stop work orders	Yes. Procedure to evaluate proper implementation and maintenance of construction site erosion control systems.

MCM	BMP	Parameter	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
4	BMP 9 Structural Control Maintenance, Inspection, and Enforcement	Stormwater structural controls	1 158 8	Memo of program evaluation # of priority city-owned structural controls # of priority privately-owned structural controls	Yes. Procedure to evaluate the use of proper stormwater structural controls.
5	BMP 10 Maintenance Contractor Oversight	Contracted maintenance activities	116 0 0	Contracts Reported complaints Inspections	Yes. Procedure to maintain system to prevent or minimize discharge of pollutants
5	BMP 11 Municipal Operations and Maintenance Activity	Pollution prevention activities for City operations and maintenance	2 3 6	Newly identified operations/ maintenance activities Pollutants of concern with newly identified operations/ maintenance activities Total maintenance activities conducted in Keller	Yes. Procedure to maintain system to prevent or minimize discharge of pollutants.
5	BMP 12 Municipal Operations Inspection Program and Procedures	Inspection of pollution prevention measures	1 2	Inspections Corrective Actions	Yes. Procedure to maintain system to prevent or minimize discharge of pollutants.
5	BMP 13 Disposal of Collected Waste	Waste removal records	1,455	Completed work orders	Yes. Collection and proper disposal of pollutants

MCM	BMP	Parameter	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
5	BMP 14 Street Sweeping (Roadway Pollution Prevention)	Street sweeper	772.4 397	Lane miles swept Cubic yards of debris collected	Yes. Collection and proper disposal of street and parking lot waste.
2, 3, & 5	BMP 15 Staff Training	Staff training	14 1 33	Training documentation records General awareness training Personnel attended	Yes. Educates city staff of hazards associated with illegal discharges/improper disposal of waste and about the impact that stormwater discharges have on local waterways.
2, 3, & 4	BMP 16 Stormwater Quality Ordinances	City ordinances	0	Ordinance updates/adoptions	Yes. Procedure to maintain system to prevent or minimize discharge of pollutants.

4. Provide the measurable goals for each of the MCMs, and an evaluation of the success of the implementation of the measurable goals (see **Example 3 in instructions**):

MCM(s)	Measurable Goal(s)	<p align="center">Explain progress toward goal or how goal was achieved.</p> <p align="center">If goal was not accomplished, please explain.</p>
<p>MCM 1 BMP 1 Distribute Educational Material</p>	<p>Distribute educational material about stormwater pollution prevention and the hazards associated with illegal discharges and improper disposal of waste by December of each year.</p> <p>(i) Develop and distribute educational material for at least 3 stormwater pollution prevention topics.</p> <p>(ii) Utilize at least 3 methods of distribution.</p> <p>(iii) Reach at least 3 target audiences.</p> <p><i>Targeted BMP for Bacteria: Provide at least 2 topics of educational materials specific to reduction of bacteria by December of each year.</i></p>	<p>Met goal. Stormwater topics included pollution, bacteria, waste, water conservation, pet waste, yard care, and fat/oil/grease concerns.</p> <p>Distribution methods included the stormwater website, bill inserts, mailing brochures and letters/notices to restaurant owners. Target audiences included general public, HOAs, restaurants/businesses, students and teachers.</p> <p>Bacteria reduction topics included pet waste cleanup, non-flush wipes, and grease trap maintenance.</p>
<p>MCM 1, 2, & 3 BMP 2 Stormwater Reporting by Public</p>	<p>Facilitate public reporting of stormwater quality concerns and illicit discharges.</p> <p>(i) Maintain at least 1 mechanism for the public to submit stormwater quality reports.</p> <p>(ii) Ensure the stormwater reporting mechanism is publicly accessible at least 95% of the time.</p> <p>(iii) Respond to stormwater quality reports within 2 business days; if the public report concerns an immediate threat to human health or the environment, respond within 24 hours of notification.</p> <p><i>(iv) Targeted BMP for Bacteria: Respond to stormwater quality reports specific to bacteria reduction (e.g. SSO's) within 1 business day.</i></p>	<p>Met goal. City's dedicated stormwater quality webpage and phone number is used as a reporting mechanism and was available to the public 95% of the time for submittal of stormwater quality reports. One stormwater quality report was submitted to the City through the webpage in 2022 and were responded to within 2 business days of receipt. No bacteria related reports were received.</p>

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
<p>MCM 1 BMP 3 Public Involvement Opportunities</p>	<p>Facilitate public involvement and education for stormwater pollution prevention activities by December of each year. (i) Provide at least 2 public involvement opportunities for stormwater pollution prevention. (ii) Engage at least 2 target audiences. Consider and facilitate public input in the implementation of the program. (i) Provide one opportunity for public to provide feedback on the SWMP during the public comment period.</p>	<p>Met goal. City facilitated two Park Cleanup events and an Adopt-A-Street program in 2022 for public involvement. The Park Cleanup events had a combined total of 452 participants. Participants included City employees, residents, and children. The SWMP public notice is pending and the public comment period has not started.</p>
<p>MCM 2 & 5 BMP 4 Storm Sewer System Map and Facility Inventory</p>	<p>Map 100% of the City's new stormwater outfalls discharging to Waters of the U.S. within 12 months of identification or notification of installation. Review MS4 map and update inventory of facilities and structural controls and priority areas by December of each year.</p>	<p>Met goal. The City mapped 100% of new stormwater outfalls and City-owned facilities by December, 2022.</p>
<p>MCM 2 BMP 5 Illicit Discharge Prohibition/ Elimination Ordinance</p>	<p>Continue a program to inspect, investigate, and respond to notifications of spills and illicit discharges and eliminate identified sources of illicit discharge. (i) Respond to 100% of notifications of spills and illicit discharge with inspections within 2 business days of receiving a notification; if the notification concerns an immediate threat to human health or the environment, respond within 24 hours of notification. (ii) Notify TCEQ of 100% of spills and illicit discharges that are believed to be an immediate threat to human health or the environment within 24 hours of identification. <i>(iii) Targeted BMP for Bacteria: Conduct inspections and maintenance of sanitary sewer system and record at least 95% of inspection and maintenance work orders by December of each year.</i></p>	<p>Met goal. City staff responded to 100% of spill notifications and illicit discharges within 2 business days. 2 notifications were made to TCEQ regarding hazardous spills. Both were made within 24 hours of identification. Sanitary sewer inspections and maintenance are documented using the work order system. This system stores 95% of the work orders for the sanitary sewer system.</p>

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
<p>MCM 2 BMP 6 OSSF Procedures</p>	<p>Maintain one copy of inventory of known OSSF within the MS4 area.</p> <p>Refer 100% of known reports of failing on-site septic facilities to jurisdictional authority within 1 business day of receipt of report.</p> <p>Request one copy of the OSSF inspection reports from jurisdictional authority by December of each year.</p>	<p>Met goal. The City maintained one copy of inventory of known OSSF within the MS4 area. Reports of failing OSSFs are referred to Tarrant County Health Department (TCHD). No OSSF complaints were filed with TCHD in 2022.</p>
<p>MCM 3 & 4 BMP 7 Plan Review</p>	<p>Conduct engineering and construction plan reviews of site development and redevelopment projects to the standards set forth in City ordinances and design criteria to evaluate potential water quality impacts during construction and post-construction.</p> <p>(i) Review 100% of plans submitted to the City prior to final acceptance of plans.</p> <p>(ii) Maintain one copy of final plan review documentation for 100% of approved construction plans.</p>	<p>Met goal. City reviews 100% of plans properly submitted prior to final acceptance. Copies of plan reviews are maintained after each review.</p>
<p>MCM 2 & 3 BMP 8 Construction Site Inspection and Enforcement</p>	<p>Conduct inspections of priority construction sites (e.g. site size, contractor performance history, sensitivity of receiving waters) within the MS4 according to City procedures and ordinances.</p> <p>(i) Conduct at least one site inspection of 100% of identified active priority construction sites, including evaluation of coverage under the Construction General Permit (TXR150000).</p> <p>(ii) Maintain one copy of each completed construction site inspection report.</p> <p>Enforce correction by violators of City ordinance governing construction site operations and TPDES Construction General Permit TXR150000.</p> <p>(i) Conduct follow-up action (i.e. inspection or enforcement) for 100% of sites with observed violations within 10 business days.</p>	<p>Met goal. City staff conducted at least one site inspection of 100% of construction sites. Copies of inspections are maintained in the City's work order database. City inspectors conduct inspections and inform contractors of the issues identified. Follow-up inspections are conducted within 10 business days. If issues remain, stop work orders are issued.</p>

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
<p>MCM 4 BMP 9 Structural Control Maintenance, Inspection, and Enforcement</p>	<p>Continue inspections of City-owned priority water quality structural controls according to written procedures. (i) Inspect 100% of City-owned priority water quality structural controls by the end of the permit term.</p> <p>Continue and/or implement requirements for deed-recorded maintenance plans for privately-owned structural controls. (i) Record 100% of maintenance agreements for new privately-owned post-construction BMPs prior to final acceptance. (ii) Document enforcement action for post-construction requirements at privately-owned post-construction BMPs by December of each year.</p>	<p>Met goal. Following written procedures, City is on track to inspect 100% of City-owned priority water quality structural controls by the end of the permit term. City continues to record 100% of maintenance agreements with new privately-owned post-construction BMPs prior to acceptance. Enforcement action is recorded and maintained for documentation.</p>
<p>MCM 5 BMP 10 Maintenance Contractor Oversight</p>	<p>Utilize standard contract language requiring compliance with City stormwater pollution prevention measures, good housekeeping practices, and facility specific stormwater management operating procedures on 100% of new or renewed service agreements with contractors hired to perform City maintenance activities with the potential to impact stormwater quality.</p> <p>Investigate stormwater quality reports concerning contracted maintenance activities within 2 business days of receipt of report. (i) Maintain one copy of inspection documentation notes and follow-up actions, as necessary.</p>	<p>Met goal. City incorporated standard contract language into 3rd-party contracts requiring each contractor to comply with City ordinances. No contractor reports were received; therefore, no inspections were conducted in 2022.</p>
<p>MCM 5 BMP 11 Municipal Operations and Maintenance Activity</p>	<p>Continue to perform existing operations and maintenance activities according to established procedures to reduce the discharge of pollutants from the activities.</p> <p>Implement a set of pollution prevention measures for any newly identified operations and maintenance activities with potential to impact stormwater quality performed by the City within 12 months of identification of the activity.</p>	<p>Met goal. City identified two new maintenance activities with potential to impact stormwater quality and implemented pollution prevention measures to reduce discharge of pollutants from the activities.</p>

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
<p>MCM 5 BMP 12 Municipal Operations Inspection Program and Procedures</p>	<p>Begin visual inspection of pollution prevention measures at City-owned facilities according to written procedures. (i) Inspect 100% of pollution prevention measures by the end of the permit term. (ii) Maintain one completed inspection checklist for each facility.</p>	<p>Met goal. One inspection was conducted according to written procedures. Two corrective actions were taken. Inspection checklist was filed for documentation.</p>
<p>MCM 5 BMP 13 Disposal of Collected Waste</p>	<p>Dispose of waste material in accordance with Title 30 of Texas Administrative Code Chapters 330 or 335, as applicable. (i) Maintain one copy of associated waste disposal documentation (e.g. waste manifests, contractor invoices, etc.) and estimate the amount of waste material disposed of by December of each year.</p>	<p>Met goal. City performed 1,455 work orders resulting in waste material. Waste disposal manifests are recorded in the work order system and maintained for documentation.</p>
<p>MCM 5 BMP 14 Street Sweeping (Roadway Pollution Prevention)</p>	<p>Conduct street sweeping activities for City-owned roadways and parking lots according to established procedures. (i) Maintain a schedule/log of sweeper activity; record 100% of entries by December of each year.</p>	<p>Met goal. City logged 100% of street sweeping activities in 2022 using the work order system.</p>
<p>MCM 2, 3, & 5 BMP 15 Staff Training</p>	<p>Conduct training for staff with responsibilities relating to activities with potential impacts to stormwater quality. (i) Provide general awareness-level training for pollution prevention and good housekeeping to staff at least once annually. (ii) Provide job-specific stormwater quality and pollution prevention training to 100% of staff responsible for performing those activities in advance of conducting unsupervised responsibilities. (iii) Provide job-specific stormwater quality and pollution prevention training to 100% of staff responsible for performing those activities within 12 months of date of hire or transfer to new role. (iv) Maintain one copy of training documentation onsite or in SWMP by December of each year.</p>	<p>Met goal. City conducted an annual Stormwater Pollution and Illicit Discharge Detection & Elimination training on 12/15/2022. 3 City employees completed job specific recertification courses in 2022.</p>

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
MCM 2, 3, & 4 BMP 16 Stormwater Quality Ordinances	Document any changes to existing City ordinances to comply with illicit discharge prohibition, construction site stormwater runoff control, and post-construction permit requirements in one memo to file by December.	Met goal. No changes were made to existing City ordinances to comply with SWMP permit requirements.

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.?

In order to assess the success of the SWMP at reducing the discharge of pollutants to the MEP, the following items were performed: IDDE investigations and inspections, construction site inspections, manhole inspections, channel and culvert maintenance, and inlets and streets clean out.

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.

No waterbodies within the permitted area were added to the 2022 Texas Integrated Report Index of Water Quality Impairments.

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.

Lower West Fork Trinity River (Segment 0841) – Bacteria

MCM(s)	Focused BMPs for Bacteria	Permit Year 4 Stormwater Activities
1	<p>BMP 1 Distribute Educational Material</p>	<p>Measurable Goal Distribute educational material about stormwater pollution prevention and the hazards associated with illegal discharges and improper disposal of waste by December of each year. (i) Develop and distribute educational material for at least 3 stormwater pollution prevention topics. (ii) Utilize at least 3 methods of distribution. (iii) Reach at least 3 target audiences. <i>Targeted BMP for Bacteria: Provide at least 2 topics of educational materials specific to reduction of bacteria by December of each year.</i></p>
1, 2, & 3	<p>BMP 2 Stormwater Reporting by Public</p>	<p>Measurable Goal Facilitate public reporting of stormwater quality concerns and illicit discharges. (i) Maintain at least 1 mechanism for the public to submit stormwater quality reports. (ii) Ensure the stormwater reporting mechanism is publicly accessible at least 95% of the time. (iii) Respond to stormwater quality reports within 2 business days; if the public report concerns an immediate threat to human health or the environment, respond within 24 hours of notification. (iv) <i>Targeted BMP for Bacteria: Respond to stormwater quality reports specific to bacteria reduction (e.g. SSO's) within 1 business day.</i></p>

MCM(s)	Focused BMPs for Bacteria	Permit Year 4 Stormwater Activities
2	<p>BMP 5 Illicit Discharge and Spill Inspection, Investigation, and Response</p>	<p>Measurable Goal</p> <p>Continue a program to inspect, investigate, and respond to notifications of spills and illicit discharges and eliminate identified sources of illicit discharge.</p> <p>(i) Respond to 100% of notifications of spills and illicit discharge with inspections within 2 business days of receiving a notification; if the notification concerns an immediate threat to human health or the environment, respond within 24 hours of notification.</p> <p>(ii) Notify TCEQ of 100% of spills and illicit discharges that are believed to be an immediate threat to human health or the environment within 24 hours of identification.</p> <p><i>(iii) Targeted BMP for Bacteria: Conduct inspections and maintenance of sanitary sewer system and record at least 95% of inspection and maintenance work orders by December of each year.</i></p>
2	<p>BMP 6 OSSF Procedures</p>	<p>Measurable Goal</p> <p>Maintain one copy of inventory of known OSSF within the MS4 area.</p> <p>Refer reports of failing on-site septic facilities to jurisdictional authority within 1 business day of receipt of report.</p> <p>Request OSSF inspection reports from jurisdictional authority by December of each year.</p>

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

The City discharges stormwater to the Lower West Fork Trinity River indirectly. However, the City's targeted controls for reducing bacteria are residential areas and sanitary sewer system protections. The four focused BMPs have been selected to focus on these two targeted areas of control.

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

Benchmark Parameter <i>(Ex: Total Suspended Solids)</i>	Benchmark Value	Description of additional sampling or other assessment activities	Year(s) conducted
Bacteria	1,085 Billion MPN/day for Bear Creek (Segment 0841B)	No additional sampling	N/A

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
Bacteria	BMP 1 Distribute Educational Material	Education about best practices
Bacteria	BMP 2 Stormwater Reporting by Public	Prompt reporting of discharges for rapid response
Bacteria	BMP 5 Illicit Discharge and Spill Inspection, Investigation, and Response	Procedures to minimize discharge of pollutants
Bacteria	BMP 6 OSSF Procedures	Practices to prevent or minimize system failures that would result in discharge of pollutants

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

Description of bacteria-focused BMP	Comments/Discussion
BMP 1 Distribute Educational Material	Education about best practices
BMP 2 Stormwater Reporting by Public	Prompt reporting of discharges for rapid response
BMP 5 Illicit Discharge and Spill Inspection, Investigation, and Response	Procedures to minimize discharge of pollutants
BMP 6 OSSF Procedures	Practices to prevent or minimize system failures that would result in discharge of pollutants

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

For example, the MS4 may use the following benchmark indicators:

- number of sources identified or eliminated;
- number of illegal dumpings;
- increase in illegal dumping reported;
- number of educational opportunities conducted;
- reductions in sanitary sewer flows (SSOs); /or
- increase in illegal discharge detection through dry screening.

Benchmark Indicator	Description/Comments
Number of sources identified or eliminated	There were 187 bags of trash collected through volunteer and routine street/parks cleanup activities; 1,455 work orders completed for debris removal and maintenance of streets, culverts, inlets, and channels; There were 421 sanitary sewer work orders for line inspections and maintenance conducted; 154,187 feet of sanitary sewer system cleaned and 11,949 feet of sanitary sewer system inspected.
Reduction in illegal dumping	Out of 32 illegal dumping violations reported, there were only 10 illegal discharge activities confirmed.
Number of educational opportunities conducted	<p>A total of 22,394 bacteria related educational materials were distributed. The material distributed addressed the following:</p> <ul style="list-style-type: none"> -Bacteria discharging from a residential site either during storm runoff events or directly -Fats, oils, and grease (FOG) clogging sanitary sewer lines and causing overflows -Non-flushable wipes clogging sanitary sewer lines and causing overflows -Pet waste and bacteria -Yard waste/fertilizers <p>A total of two (2) links are accessible on the City's stormwater web page. The stormwater web page was updated and is available for public view. In 2022 the stormwater web page received a total of 213 web page views.</p>
Reductions in sanitary sewer overflows (SSOs)	There were zero (0) sanitary sewer overflows (SSOs) during the reporting period. The City continues its efforts to improve sanitary sewer operation by conducting routine maintenance and inspections of sewer lines. A total of 11,194 educational materials were distributed to residents and food establishments with a list of best management practices (BMPs) for reduction of SSOs resulting from FOG and non-flushable wipes build up in sanitary sewer lines.

E. Stormwater Activities

Describe activities planned for the next reporting year:

MCM(s)	BMP	Stormwater Activity	Description/Comments
1	1	Distribute Education Material	<p>Measurable Goal:</p> <p>A. Distribute educational material about stormwater pollution prevention and the hazards associated with illegal discharges and improper disposal of waste by <u>December of each year</u>.</p> <p>i. Develop and distribute educational material for at least 3 stormwater pollution prevention topics.</p> <p>ii. Utilize at least 3 methods of distribution.</p> <p>iii. Reach at least 3 target audiences.</p> <p>B. <i>Targeted BMP for Bacteria: Provide <u>at least 2 topics</u> of educational materials specific to reduction of bacteria by <u>December of each year</u>.</i></p>
1,2, & 3	2	Stormwater Reporting by Public	<p>Measurable Goal:</p> <p>A. Facilitate public reporting of stormwater quality concerns and illicit discharges.</p> <p>i. Maintain at least 1 mechanism for the public to submit stormwater quality reports.</p> <p>ii. Ensure the stormwater reporting mechanism is publicly accessible at least 95% of the time.</p> <p>iii. Respond to stormwater quality reports within 2 business days; if the public report concerns an immediate threat to human health or the environment, respond within 24 hours of notification.</p> <p>iv. <i>Targeted BMP for Bacteria: Respond to stormwater quality reports specific to bacteria reduction (e.g. SSO's) within 1 business day.</i></p>

MCM(s)	BMP	Stormwater Activity	Description/Comments
1	3	Public Involvement Opportunities	<p>Measurable Goal:</p> <p>A. Facilitate public involvement and education for stormwater pollution prevention activities <u>by December of each year.</u></p> <ul style="list-style-type: none"> i. Provide <u>at least 2 public involvement opportunities</u> for stormwater pollution prevention. ii. Engage <u>at least 2 target audiences.</u> <p>B. Consider and facilitate public input in the implementation of the program.</p> <ul style="list-style-type: none"> i. Provide <u>one opportunity</u> for public to provide feedback on the SWMP during the public comment period.
2 & 5	4	Storm Sewer System Map and Facility Inventory	<p>Measurable Goal:</p> <p>A. Map <u>100%</u> of the City's new stormwater outfalls discharging to Waters of the U.S. <u>within 12 months</u> of identification or notification of installation.</p> <p>B. Review MS4 map and update inventory of facilities and structural controls by <u>December of each year.</u></p>
2	5	Illicit Discharge and Spill Inspection, Investigation, and Response	<p>Measurable Goal:</p> <p>A. Continue a program to inspect, investigate, and respond to notifications of spills and illicit discharges and eliminate identified sources of illicit discharge.</p> <ul style="list-style-type: none"> i. Respond to <u>100%</u> of notifications of spills and illicit discharge with inspections <u>within 2 business days</u> of receiving a notification; if the notification concerns an immediate threat to human health or the environment, respond <u>within 24 hours</u> of notification. ii. Notify TCEQ of <u>100%</u> of spills and illicit discharges that are believed to be an immediate threat to human health or the environment <u>within 24 hours</u> of identification. iii. <i>Targeted BMP for Bacteria: Conduct inspections and maintenance of sanitary sewer system and record <u>at least 95%</u> of inspection and maintenance work orders by <u>December of each year.</u></i>

MCM(s)	BMP	Stormwater Activity	Description/Comments
2	6	OSSF Procedures	<p>Measurable Goal:</p> <ul style="list-style-type: none"> A. Maintain <u>one copy</u> of inventory of known OSSF within the MS4 area. B. Refer <u>100% of known</u> reports of failing on-site septic facilities to jurisdictional authority <u>within 1 business day</u> of receipt of report. C. Request <u>one copy</u> of the OSSF inspection reports from jurisdictional authority <u>by December of each year</u>.
3 & 4	7	Plan Review	<p>Measurable Goal:</p> <ul style="list-style-type: none"> A. Conduct engineering and construction plan reviews of site development and redevelopment projects to the standards set forth in City ordinances and design criteria to evaluate potential water quality impacts during construction and post-construction. <ul style="list-style-type: none"> i. Review <u>100%</u> of plans submitted to the City prior to final acceptance of plans. ii. Maintain <u>one copy</u> of final plan review documentation for <u>100%</u> of approved construction plans.
2 & 3	8	Construction Site Inspection and Enforcement	<p>Measurable Goal:</p> <ul style="list-style-type: none"> A. Conduct inspections of priority construction sites (e.g. site size, contractor performance history, sensitivity of receiving waters) within the MS4 according to City procedures and ordinances. <ul style="list-style-type: none"> i. Conduct <u>at least one site inspection of 100%</u> of identified active priority construction sites, including evaluation of coverage under the Construction General Permit (TXR0150000). ii. Maintain <u>one copy</u> of each completed construction site inspection report. B. Enforce correction of violations of City ordinance provisions governing construction site operations and TPDES Construction General Permit TXR150000. <ul style="list-style-type: none"> i. Conduct follow-up action (i.e. inspection or enforcement) for <u>100% of sites</u> with observed violations <u>within 10 business days</u>.

MCM(s)	BMP	Stormwater Activity	Description/Comments
4	9	Structural Control Maintenance, Inspection, and Enforcement	<p>Measurable Goal:</p> <ul style="list-style-type: none"> A. Continue inspections of City-owned priority water quality structural controls according to written procedures. <ul style="list-style-type: none"> i. Inspect <u>100%</u> of City-owned priority water quality structural controls <u>by the end of the permit term</u>. B. Continue and/or implement requirements for deed-recorded maintenance plans for privately-owned structural controls. <ul style="list-style-type: none"> i. Record <u>100%</u> of maintenance agreements for new privately-owned post-construction BMPs prior to final acceptance. ii. Document enforcement action for post-construction requirements at privatelyowned post-construction BMPs <u>by December of each year</u>.
5	10	Maintenance Contractor Oversight	<p>Measurable Goal:</p> <ul style="list-style-type: none"> A. Utilize standard contract language requiring compliance with City stormwater pollution prevention measures, good housekeeping practices, and facility specific stormwater management operating procedures on <u>100%</u> of new or renewed service agreements with contractors hired to perform City maintenance activities with the potential to impact stormwater quality. B. Investigate stormwater quality reports concerning contracted maintenance activities <u>within 2 business days</u> of receipt of report. <ul style="list-style-type: none"> i. Maintain <u>one copy</u> of inspection documentation notes and follow-up actions, as necessary.

MCM(s)	BMP	Stormwater Activity	Description/Comments
5	11	Municipal Operations and Maintenance Activity	<p>Measurable Goal:</p> <ul style="list-style-type: none"> A. Continue to perform existing operations and maintenance activities according to established procedures to reduce the discharge of pollutants from the activities. B. Implement a set of pollution prevention measures for any newly identified operations and maintenance activities with potential to impact stormwater quality performed by the City <u>within 12 months</u> of identification of the activity.
5	12	Municipal Operations Inspection Program and Procedures	<p>Measurable Goal:</p> <ul style="list-style-type: none"> A. Begin visual inspection of pollution prevention measures at City-owned facilities according to written procedures. <ul style="list-style-type: none"> i. Inspect <u>100%</u> of pollution prevention measures <u>by the end of the permit term</u>. ii. <u>Maintain one completed inspection checklist</u> for each facility.
5	13	Disposal of Collected Waste	<p>Measurable Goal:</p> <ul style="list-style-type: none"> A. Dispose of waste material in accordance with Title 30 of Texas Administrative Code Chapters 330 or 335, as applicable. <ul style="list-style-type: none"> i. Maintain <u>one copy</u> of associated waste disposal documentation (e.g. waste manifests, contractor invoices, etc.) and estimate the amount of waste material disposed of by <u>December of each year</u>.
5	14	Street Sweeping (Roadway Pollution Prevention)	<p>Measurable Goal:</p> <ul style="list-style-type: none"> A. Conduct street sweeping activities for City-owned roadways and parking lots according to established procedures. <ul style="list-style-type: none"> i. Maintain a schedule/log of sweeper activity; <u>record 100% of entries by December of each year</u>.

MCM(s)	BMP	Stormwater Activity	Description/Comments
2,3, & 5	15	Staff Training	<p>Measurable Goal:</p> <ul style="list-style-type: none"> A. Conduct training for staff with responsibilities relating to activities with potential impacts to stormwater quality. <ul style="list-style-type: none"> i. Provide general awareness level training for pollution prevention and good housekeeping to staff <u>at least once annually.</u> ii. Provide job-specific stormwater quality and pollution prevention training to <u>100% of staff responsible</u> for performing those activities <u>in advance of conducting unsupervised responsibilities.</u> iii. Provide job-specific stormwater quality and pollution prevention training to <u>100% of staff responsible</u> for performing those activities <u>within 12 months of date of hire or transfer to new role.</u> iv. Maintain <u>one copy</u> of training documentation onsite or in SWMP by <u>December of each year.</u>
2,3, & 4	16	Stormwater Quality Ordinances	<p>Measurable Goal:</p> <ul style="list-style-type: none"> A. Document any changes to existing City ordinances to comply with illicit discharge prohibition, construction site stormwater runoff control, and post-construction permit requirements in a memo to file <u>by December of each year.</u>

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

The City is currently drafting proposed changes to the SWMP. The City has not finalized these initial changes nor officially submitted the proposed changes to TCEQ. Once the City has finalized the changes they will be delivered via email to the appropriate SWMP reviewer for approval.

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)
N/A	N/A	N/A

Note: If changes include additions or substitutions of BMPs, include a written analysis explaining why the original BMP is ineffective or not feasible, and why the replacement BMP is expected to achieve the goals of the original BMP.

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

N/A

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 (start date, etc.)	Status/Completion Date (completed, in progress, not started)
N/A	N/A	N/A	N/A

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): **N/A**

- 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? **N/A**

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

Authorization Number: **N/A** Permittee: **N/A**

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):

 1

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

Yes No

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

The number of municipal construction activities authorized under this general permit	N/A
The total number of acres disturbed for municipal construction projects	N/A

Note: Though the seventh MCM is optional, implementation must be requested on the NOI or on a NOC and approved by the TCEQ.

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): Alonzo Liñán Title: Director of Public Works

Signature: _____ Date: _____

Name of MS4 City of Keller MS4

If you have questions on how to fill out this form or about the Stormwater Permitting program, please contact us at 512-239-4671.

Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, contact us at 512-239-3282.