

# Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number TXR040000

## A. General Information

Authorization Number: TXR040017

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

Annual Reporting Year Option Selected by MS4:

Calendar Year:  X

Permit Year: \_\_\_\_\_

Fiscal Year: \_\_\_\_\_ Last day of fiscal year: (\_\_\_\_\_)

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

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

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

Contact Name: Oleksandra Bikman Telephone Number: 817-743-4092

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E-mail Address: obikman@cityofkeller.com

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.	<b>X</b>		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.	<b>X</b>		
Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.).	<b>X</b>		
Permittee conducted an annual review of its SWMP in conjunction with preparation of the annual report	<b>X</b>		

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	Yes- Approved by TCEQ and appropriate for Public Education, Outreach, and Involvement.
1	BMP 2 Web Site	Yes- Approved by TCEQ and appropriate for Public Education, Outreach, and Involvement.
1, 2, 3	BMP 3 Stormwater Reporting Line	Yes - Approved by TCEQ and appropriate for Public Education, Outreach, and Involvement; Illicit Discharge and Elimination, and Construction Site Runoff Control.
1	BMP 4 Waste Cleanup	Yes- Approved by TCEQ and appropriate for Public Education, Outreach, and Involvement.

<b>MCM(s)</b>	<b>BMP</b>	<b>BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)</b>
2	BMP 5 Illicit Discharge Prohibition/Elimination Ordinance	Yes - Approved by TCEQ and appropriate for Illicit Discharge and Elimination.
2	BMP 6 Storm Sewer System Map	Yes - Approved by TCEQ and appropriate for Illicit Discharge and Elimination.
2	BMP 7 IDDE Training	Yes - Approved by TCEQ and appropriate for Illicit Discharge and Elimination.
2	BMP 8 IDDE Response, Investigation, and Inspections	Yes - Approved by TCEQ and appropriate for Illicit Discharge and Elimination.
2	BMP 9 Spill Response	Yes - Approved by TCEQ and appropriate for Illicit Discharge and Elimination.
2	BMP 10 Sanitary Sewer Line Maintenance and Inspection	Yes - Approved by TCEQ and appropriate for Illicit Discharge and Elimination.
2	BMP 11 OSSF Procedures	Yes - Approved by TCEQ and appropriate for Illicit Discharge and Elimination.
3	BMP 12 Erosion Control Ordinance and Requirements for Construction Site Contractors	Yes - Approved by TCEQ and appropriate for Construction Site Stormwater Runoff Control.
3	BMP 13 Erosion Control Plan Review	Yes - Approved by TCEQ and appropriate for Construction Site Stormwater Runoff Control.
3	BMP 14 Construction Site Inspection and Enforcement	Yes - Approved by TCEQ and appropriate for Construction Site Stormwater Runoff Control.
3	BMP 15 Engineering and Construction Staff Training	Yes - Approved by TCEQ and appropriate for Construction Site Stormwater Runoff Control.

<b>MCM(s)</b>	<b>BMP</b>	<b>BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)</b>
4	BMP 16 Post-Construction Stormwater Ordinance	Yes - Approved by TCEQ and appropriate for Post-Construction Stormwater Management.
4	BMP 17 Development Review	Yes - Approved by TCEQ and appropriate for Post-Construction Stormwater Management.
4	BMP 18 Structural Control Maintenance	Yes - Approved by TCEQ and appropriate for Post-Construction Stormwater Management.
5	BMP 19 Inventory of Facilities and Stormwater Controls	Yes - Approved by TCEQ and appropriate for Pollution Prevention and Good Housekeeping.
5	BMP 20 Employee Training	Yes - Approved by TCEQ and appropriate for Pollution Prevention and Good Housekeeping.
5	BMP 21 Disposal of Collected Waste	Yes - Approved by TCEQ and appropriate for Pollution Prevention and Good Housekeeping.
5	BMP 22 Contractor Oversight Procedures	Yes- Approved by TCEQ and appropriate for Pollution Prevention and Good Housekeeping.
5	BMP 23 Municipal Operations and Maintenance Activity	Yes- Approved by TCEQ and appropriate for Pollution Prevention and Good Housekeeping.
5	BMP 24 Street Sweeping	Yes - Approved by TCEQ and appropriate for Pollution Prevention and Good Housekeeping.

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(s)	BMP	Parameter	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Yes / No / Explain)
1 & 5	BMP 4 Waste Cleanup BMP 21 Disposal of Collected Waste	Volunteer trash cleanup events	151	Bags	Direct. Collection and proper disposal of pollutants
1 & 5	BMP 4 Waste Cleanup BMP 21 Disposal of Collected Waste BMP 23 Municipal Operations and Maintenance Activity	Daily routine park cleanup	24,000	Bags	Direct. Collection and proper disposal of pollutants
1 & 5	BMP 4 Waste Cleanup BMP 21 Disposal of Collected Waste BMP 23 Municipal Operations and Maintenance Activity	Daily routine street cleanup	50	Completed work orders	Direct. Collection and proper disposal of pollutants

<b>MCM(s)</b>	<b>BMP</b>	<b>Parameter</b>	<b>Quantity</b>	<b>Units</b>	<b>Does BMP Demonstrate a Direct Reduction in Pollutants? (Yes / No / Explain)</b>
1 & 5	BMP 4 Waste Cleanup BMP 21 Disposal of Collected Waste BMP 23 Municipal Operations and Maintenance Activity	Channel maintenance	15	Completed work orders	Direct. Collection and proper disposal of pollutants
1 & 5	BMP 4 Waste Cleanup BMP 21 Disposal of Collected Waste BMP 23 Municipal Operations and Maintenance Activity	Storm inlet cleanup and culvert maintenance	15	Completed work orders	Direct. Collection and proper disposal of pollutants
1 & 5	BMP 4 Waste Cleanup BMP 21 Disposal of Collected Waste BMP 23 Municipal Operations and Maintenance Activity	Routine street tree limb/brush removal	114	Completed work orders	Direct. Collection and proper disposal of pollutants
1 & 5	BMP 4 Waste Cleanup BMP 21 Disposal of Collected Waste	HHW Collection	144,561	Pounds	Direct. Collection and proper disposal of pollutants

<b>MCM(s)</b>	<b>BMP</b>	<b>Parameter</b>	<b>Quantity</b>	<b>Units</b>	<b>Does BMP Demonstrate a Direct Reduction in Pollutants? (Yes / No / Explain)</b>
2	BMP 9 Spill Response	Spills	8	Response events	Direct. Procedure to promptly address detected discharge of pollutants.
2	BMP 10 Sanitary Sewer Line Maintenance and Inspection	Sanitary sewer	554 275,843 28,067	Inspections and improvements Feet of system cleaned Feet of system TV-inspected	Direct. Procedure to maintain system to prevent or minimize discharge of pollutants.
3	BMP 14 Construction Site Inspection and Enforcement	Construction sites Enforcement	1,824 90	Inspections Stop work orders and notices of violations issued	Direct. Procedure to evaluate proper implementation and maintenance of construction site erosion control systems.
4	BMP 17 Development Review	Plans	137	Reviews	Direct. Procedure to evaluate proper design of pollutant control systems.
5	BMP 24 Street Sweeping	Street sweeper	814.95	Street miles swept	Direct. Collection and proper disposal of street and parking lot waste.

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**):

<b>MCM(s)</b>	<b>Measurable Goal(s)</b>	<b>Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.</b>
<p>MCM 1</p> <p><b>BMP 1</b></p> <p><b>Distribute Educational Material</b></p>	<p>Continue to distribute stormwater quality educational information to public employees, businesses, and the general public a minimum of once per year.</p> <p>Increase focus to educate residents on:</p> <ul style="list-style-type: none"> <li>(i) Bacteria discharging from a residential site either during runoff events or directly;</li> <li>(ii) Fats, oils, and grease clogging sanitary sewer lines and resulting overflows;</li> <li>(iii) Decorative ponds; and</li> <li>(iv) Pet waste.</li> </ul>	<p>Met goal. Total of 15,421 stormwater quality educational materials were distributed during the reporting period.</p>
<p>MCM 1</p> <p><b>BMP 2</b></p> <p><b>Web Site</b></p>	<p>Continue to revise, update, and maintain the stormwater website, as needed.</p> <p>Continue to solicit input and feedback from the public for stormwater quality issues and opportunities in the City.</p> <p>Increase focus to educate residents on:</p> <ul style="list-style-type: none"> <li>(i) Bacteria discharging from a residential site either during runoff events or directly;</li> <li>(ii) Fats, oils, and grease clogging sanitary sewer lines and resulting overflows;</li> <li>(iii) Decorative ponds; and</li> <li>(iv) Pet waste.</li> </ul>	<p>Met goal. City’s dedicated stormwater quality webpage is updated regularly to ensure the contents are current. It received a total of 307 page-views.</p>



<b>MCM(s)</b>	<b>Measurable Goal(s)</b>	<b>Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.</b>
<p>MCM 1, 2, 3</p> <p><b>BMP 3</b></p> <p><b>Stormwater Reporting Line</b></p>	<p>Continue to educate the public about the existence of the stormwater reporting line through various educational outlets like distributed material and stormwater website.</p> <p>Continue documenting each call and dispatching to appropriate department for proper response.</p> <p>Conduct a review of calls to identify trends (i.e., repeated reports of illegal dumping in certain areas of the City), general needs for reporting line improvement, and areas requiring additional educational or enforcement effort to protect stormwater quality and update the written procedures accordingly.</p>	<p>Met goal. City staff received a total of 11 illegal discharge complaints on the stormwater reporting line. The stormwater reporting line is available on the City website.</p>
<p>MCM 1</p> <p><b>BMP 4</b></p> <p><b>Waste Cleanup</b></p>	<p>Continue offering waste cleanup activities (e.g., bulk waste cleanup, household hazardous waste collection, park cleanup).</p> <p>Evaluate opportunities and public receptiveness for additional waste cleanup activities.</p>	<p>Met goal. There were 24,151 bags of trash collected through volunteer and routine street/parks cleanups; 194 street/culvert/inlet/channel cleanup/maintenance work orders completed; and 144,561 pounds of household hazardous waste (HHW) collected.</p>
<p>MCM 2</p> <p><b>BMP 5</b></p> <p><b>Illicit Discharge Prohibition/ Elimination Ordinance</b></p>	<p>Continue enforcement of the illicit discharge ordinance.</p> <p>Conduct education activities, as needed, to inform the public about new ordinance requirements.</p>	<p>Met goal. City has an ordinance and code enforcement mechanisms prohibiting illicit discharges. There were 9 warnings issued during the reporting period addressing illicit discharges.</p>

<b>MCM(s)</b>	<b>Measurable Goal(s)</b>	<b>Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.</b>
MCM 2 <b>BMP 6</b> <b>Storm Sewer System Map</b>	Complete the update of the map of the stormwater outfall drainage system of the City and document the source of information used to develop map.	Met goal. City has a storm sewer system map that is updated regularly to record new pipes or systems created by new development.
MCM 2 <b>BMP 7</b> <b>IDDE Training</b>	Continue IDDE training according to written procedures.	Met goal. City conducts annual IDDE training to all field staff.
MCM 2 <b>BMP 8</b> <b>IDDE Response, Investigation, and Inspections</b>	<p>Continue illicit discharge response and investigation activities including documenting the events on the investigation form.</p> <p>Continue follow-up investigations, if applicable.</p> <p>Prioritize the investigation of discharges based on relative risk of pollution.</p> <p>Place additional effort to reduce waste sources of bacteria.</p>	Met goal. City conducted 11 IDDE investigations and inspections.
MCM 2 <b>BMP 9</b> <b>Spill Response</b>	<p>Continue implementation of spill response procedures and training through the Fire Department.</p> <p>Evaluate existing spill response procedures and training and modify as necessary to protect water quality.</p>	Met goal. City staff responded to 8 spill events.

<b>MCM(s)</b>	<b>Measurable Goal(s)</b>	<b>Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.</b>
<p>MCM 2</p> <p><b>BMP 10</b></p> <p><b>Sanitary Sewer Line Maintenance and Inspection</b></p>	<p>Conduct sanitary sewer inspections.</p> <p>Observe for opportunities to:</p> <p>(i) Make improvements to sanitary sewers to reduce overflows;</p> <p>(ii) Address lift station inadequacies;</p> <p>(iii) Improve reporting of overflows; and</p> <p>(iv) Strengthen sanitary sewer use requirements to reduce blockage from fats, oils, and grease.</p>	<p>Met goal. There were 554 sanitary sewer line inspections and maintenance conducted; 275,843 feet of system cleaned; 28,067 feet of system TV-inspected.</p>
<p>MCM 2</p> <p><b>BMP 11</b></p> <p><b>OSSF Procedures</b></p>	<p>Continue implementing procedures to prevent and correct leaking on-site sewage disposal systems.</p> <p>Develop an inventory of on-site sewage disposal systems with a potential to discharge into the MS4.</p> <p>Identify and address failing systems and inadequate maintenance of OSSFs.</p>	<p>Met goal. Reports of failing OSSFs are referred to Tarrant County Health Department. The City submitted a request to for OSSF reports for 2019.</p>
<p>MCM 3</p> <p><b>BMP 12</b></p> <p><b>Erosion Control Ordinance and Requirements for Construction Site Contractors</b></p>	<p>Continue enforcement of erosion control ordinance.</p> <p>Conduct educational activities, as needed, to inform the public about the new ordinance requirement</p> <p>Monitor erosion and sediment controls, soil stabilization, and BMPs through established procedures.</p> <p>Monitor prohibited discharges through established procedures.</p>	<p>Met goal. City has an erosion control ordinance that prohibits illicit discharges from small and large construction activities.</p>

<b>MCM(s)</b>	<b>Measurable Goal(s)</b>	<b>Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.</b>
MCM 3 <b>BMP 13</b> <b>Erosion Control Plan Review</b>	Continue construction site plan review procedures.	Met goal. There were 137 construction/ erosion control plan reviews conducted by city staff.
MCM 3 <b>BMP 14</b> <b>Construction Site Inspection and Enforcement</b>	Continue implementing construction site inspection and enforcement procedures, including documentation of the inspections and enforcement activities.	Met goal. There were 1,824 construction site inspections conducted and 90 enforcement actions.
MCM 3 <b>BMP 15</b> <b>Engineering and Construction Staff Training</b>	Provide appropriate training to staff with duties related to the construction stormwater program prior to them conducting unassisted permitting, plan reviews, inspections, or enforcement activities.	Met goal. City engineering and construction staff received appropriate training.
MCM 4 <b>BMP 16</b> <b>Post-Construction Stormwater Ordinance</b>	Continue enforcement of the post-construction stormwater ordinance.  Issue final post-construction stormwater ordinance, if necessary.  Conduct education activities, as needed, to inform the public about new ordinance requirements.	Met goal. City has a post-construction ordinance that addresses post-construction runoff from new development and redevelopment projects. During 2019, 2 instances of post-construction stormwater ordinance enforcement were needed.
MCM 4 <b>BMP 17</b> <b>Development Review</b>	Implement the design review process.	Met goal. There were 137 new development and redevelopment reviews for adequate stormwater quality protection conducted by city staff.

<b>MCM(s)</b>	<b>Measurable Goal(s)</b>	<b>Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.</b>
<p>MCM 4</p> <p><b>BMP 18</b></p> <p><b>Structural Control Maintenance</b></p>	<p>Continue implementation of maintenance activities according to the developed procedures.</p> <p>If applicable, continue procedures for educating the public that operation and maintenance activities must be documented and retained on site to be made available for review to show compliance with long-term maintenance plans.</p>	<p>Met goal. City is continuing to implement long-term operation and maintenance of structural stormwater control measures.</p>
<p>MCM 5</p> <p><b>BMP 19</b></p> <p><b>Inventory of Facilities and Stormwater Controls</b></p>	<p>Continue developing a printable inventory of City-owned and operated facilities and stormwater controls according to the written procedures.</p>	<p>Met goal. City has developed and maintains an inventory of facilities and stormwater controls that it owns and operates within the regulated area of the small MS4.</p>
<p>MCM 5</p> <p><b>BMP 20</b></p> <p><b>Employee Training</b></p>	<p>Conduct BMP training for the municipal employees responsible for activities that may impact stormwater quality.</p>	<p>Met goal. City conducts good housekeeping and stormwater pollution prevention training for staff annually.</p>
<p>MCM 5</p> <p><b>BMP 21</b></p> <p><b>Disposal of Collected Waste</b></p>	<p>Properly dispose of collected waste materials according to water quality protection goals, including proper temporary storage of waste.</p>	<p>Met goal. City has developed procedures to dispose of general waste material.</p>
<p>MCM 5</p> <p><b>BMP 22</b></p> <p><b>Contractor Oversight Procedures</b></p>	<p>Continue implementation of written procedures to contractually require contractors to comply with the City's stormwater management program best management practices and to provide oversight of contractor activities.</p>	<p>Met goal. City provides oversight of contractor activities to ensure appropriate control and housekeeping measures are used.</p>

<b>MCM(s)</b>	<b>Measurable Goal(s)</b>	<b>Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.</b>
<p>MCM 5</p> <p><b>BMP 23</b></p> <p><b>Municipal Operations and Maintenance Activity</b></p>	<p>Continue developing written procedures, as needed, to perform assessments on municipal operation and maintenance activities and implementing pollution prevention measures that will reduce the discharge of pollutants into stormwater.</p> <p>Include visual inspection procedures and documentation procedures to confirm pollution prevention measures are functioning as intended.</p> <p>Continue implementation of scheduled assessments and inspections of municipal operation and maintenance activities.</p> <p>Continue incorporation of pollution prevention measures, as recommended in the assessments and inspections.</p>	<p>Met goal. City has implemented procedures to perform assessments on municipal operation and establishing measures that will reduce the discharge of pollutants into stormwater.</p>
<p>MCM 5</p> <p><b>BMP 24</b></p> <p><b>Street Sweeping</b></p>	<p>Continue street sweeping program for City streets, and implement supplemental activities, as needed, according to the evaluation.</p>	<p>Met goal. City is continuing to implement a street sweeping and cleaning program for streets and areas that accumulate a large amount of stormwater pollutants.</p>

## **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, dry weather inspections, construction site inspections, manhole inspections, channel and culvert maintenance, 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 2018 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**

<b>MCM(s)</b>	<b>Focused BMPs for Bacteria</b>	<b>Permit Year 1 Stormwater Activities</b>
1	<p><b>BMP 1</b> Distribute Educational Material</p>	<p><b>Measurable Goal</b> Continue to distribute stormwater quality educational information to public employees, businesses, and the general public a minimum of once per year.</p> <p>Increase focus to educate residents on: (i) Bacteria discharging from a residential site either during runoff events or directly; (ii) Fats, oils, and grease clogging sanitary sewer lines and resulting overflows; (iii) Decorative ponds; and (iv) Pet waste.</p>
1	<p><b>BMP 2</b> Web Site</p>	<p><b>Measurable Goal</b> Continue to revise, update, and maintain the stormwater website, as needed.</p> <p>Continue to solicit input and feedback from the public for stormwater quality issues and opportunities in the City.</p> <p>Increase focus to educate residents on: (i) Bacteria discharging from a residential site either during runoff events or directly; (ii) Fats, oils, and grease clogging sanitary sewer lines and resulting overflows; (iii) Decorative ponds; and (iv) Pet waste.</p>



MCM(s)	Focused BMPs for Bacteria	Permit Year 1 Stormwater Activities
1, 2, 3	<b>BMP 3</b> Stormwater Reporting Line	<p><b>Measurable Goal</b></p> <p>Continue to educate the public about the existence of the stormwater reporting line through various educational outlets like distributed material and stormwater website.</p> <p>Continue documenting each call and dispatching to appropriate department for proper response.</p> <p>Conduct a review of calls to identify trends (i.e., repeated reports of illegal dumping in certain areas of the City), general needs for reporting line improvement, and areas requiring additional educational or enforcement effort to protect stormwater quality and update the written procedures accordingly.</p>
2	<b>BMP 8</b> IDDE Response, Investigation, and Inspections	<p><b>Measurable Goal</b></p> <p>Continue illicit discharge response and investigation activities including documenting the events on the investigation form.</p> <p>Continue follow-up investigations, if applicable. Prioritize the investigation of discharges based on relative risk of pollution.</p> <p>Place additional effort to reduce waste sources of bacteria.</p>
2	<b>BMP 10</b> Sanitary Sewer Line Maintenance and Inspection	<p><b>Measurable Goal</b></p> <p>Conduct sanitary sewer inspections.</p> <p>Observe for opportunities to:</p> <ul style="list-style-type: none"> <li>(i) Make improvements to sanitary sewers to reduce overflows;</li> <li>(ii) Address lift station inadequacies;</li> <li>(iii) Improve reporting of overflows; and</li> <li>(iv) Strengthen sanitary sewer use requirements to reduce blockage from fats, oils, and grease.</li> </ul>
2	<b>BMP 11</b> OSSF Procedures	<p><b>Measurable Goal</b></p> <p>Continue implementing procedures to prevent and correct leaking on-site sewage disposal systems.</p> <p>Develop an inventory of on-site sewage disposal systems with a potential to discharge into the MS4.</p> <p>Identify and address failing systems and inadequate maintenance of OSSFs.</p>

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

***The City's targeted controls for reducing bacteria are residential areas and sanitary sewer system protections. The six focused BMPs have been selected to focus on these two targeted areas of control.***

- Report the benchmark identified by the MS4 and assessment activities:

<b>Benchmark Parameter</b> <i>(Ex: Total Suspended Solids)</i>	<b>Benchmark Value</b>	<b>Description of additional sampling or other assessment activities</b>	<b>Year(s) conducted</b>
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:

<b>Benchmark Parameter</b>	<b>Selected BMP</b>	<b>Contribution to achieving Benchmark</b>
Bacteria	BMP 1 Distribute Educational Material	Education about best practices
Bacteria	BMP 2 Web Site	Education about best practices
Bacteria	BMP 3 Stormwater Reporting Line	Prompt reporting of discharges for rapid response
Bacteria	BMP 8 IDDE Response, Investigation, and Inspections	Procedures to minimize discharge of pollutants
Bacteria	BMP 10 Sanitary Sewer Line Maintenance and Inspection	Practices to prevent or minimize system failures that would result in discharge of pollutants
Bacteria	BMP 11 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:

<b>Description of bacteria-focused BMP</b>	<b>Comments/Discussion</b>
BMP 1 Distribute Educational Material	Education about best practices
BMP 2 Web Site	Education about best practices
BMP 3 Stormwater Reporting Line	Prompt reporting of discharges for rapid response
BMP 8 IDDE Response, Investigation, and Inspections	Procedures to minimize discharge of pollutants
BMP 10 Sanitary Sewer Line Maintenance and Inspection	Practices to prevent or minimize system failures that would result in discharge of pollutants
BMP 11 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 <b>24,151</b> bags of trash collected through volunteer and routine street/parks cleanup activities; <b>194</b> work orders completed for debris removal and maintenance of streets, culverts, inlets, and channels; <b>144,561</b> pounds of household hazardous waste (HHW) collected. There were <b>554</b> sanitary sewer line inspections and maintenance conducted; <b>275,843</b> feet of sanitary sewer system cleaned and <b>28,067</b> feet of sanitary sewer system TV-inspected.
Reduction in illegal dumping	Out of <b>11</b> illegal dumping violations reported, there were only <b>4</b> illegal discharge activities confirmed.
Number of educational opportunities conducted	<p>Out of <b>51,421</b> stormwater-related educational materials, <b>25,604</b> addressed bacteria. The material distributed addressed the following:</p> <ul style="list-style-type: none"> <li>-Bacteria discharging from a residential site either during storm runoff events or directly</li> <li>-Fats, oils, and grease (FOG) clogging sanitary sewer lines and causing overflows</li> <li>-Non-flushable wipes clogging sanitary sewer lines and causing overflows</li> <li>-Pet waste and bacteria</li> <li>-Yard waste/fertilizers</li> </ul> <p>A total of <b>four (4)</b> links are accessible on the City's stormwater web page. The stormwater web page was updated and is available for public view. In 2019 the stormwater web page received a total of <b>307</b> webpage views.</p>
Reductions in sanitary sewer overflows (SSOs)	There were <b>four (4)</b> sanitary sewer overflows (SSOs) during the reporting period. The City is continuing its efforts to improve sanitary sewer operation by conducting routine maintenance and inspections of sewer lines. Total of <b>13,162</b> educational material was distributed to residents and food establishments with a list of best management practices (BMPs) for reduction of SSOs resulting from FOG (fats, oils, and grease) 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	The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process. This BMP will be implemented upon the completion of the TCEQ approval process.
1,2,3	2	Stormwater Reporting by Public	The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process. This BMP will be implemented upon the completion of the TCEQ approval process.
1	3	Public Involvement Opportunities	The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process. This BMP will be implemented upon the completion of the TCEQ approval process.
2 & 5	4	Storm Sewer System Map and Facility Inventory	The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process. This BMP will be implemented upon the completion of the TCEQ approval process.
2	5	Illicit Discharge and Spill Inspection, Investigation, and Response	The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process. This BMP will be implemented upon the completion of the TCEQ approval process.

<b>MCM(s)</b>	<b>BMP</b>	<b>Stormwater Activity</b>	<b>Description/Comments</b>
2	6	OSSF Procedures	The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process. This BMP will be implemented upon the completion of the TCEQ approval process.
3 & 4	7	Plan Review	The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process. This BMP will be implemented upon the completion of the TCEQ approval process.
2 & 3	8	Construction Site Inspection and Enforcement	The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process. This BMP will be implemented upon the completion of the TCEQ approval process.
4	9	Structural Control Maintenance, Inspection, and Enforcement	The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process. This BMP will be implemented upon the completion of the TCEQ approval process.
5	10	Maintenance Contractor Oversight	The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process. This BMP will be implemented upon the completion of the TCEQ approval process.
5	11	Municipal Operations and Maintenance Activity	The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process. This BMP will be implemented upon the completion of the TCEQ approval process.

<b>MCM(s)</b>	<b>BMP</b>	<b>Stormwater Activity</b>	<b>Description/Comments</b>
5	12	Municipal Operations Inspection Program and Procedures	The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process. This BMP will be implemented upon the completion of the TCEQ approval process.
5	13	Disposal of Collected Waste	The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process. This BMP will be implemented upon the completion of the TCEQ approval process.
5	14	Street Sweeping (Roadway Pollution Prevention)	The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process. This BMP will be implemented upon the completion of the TCEQ approval process.
2,3, & 5	15	Staff Training	The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process. This BMP will be implemented upon the completion of the TCEQ approval process.
2,3, & 4	16	Stormwater Quality Ordinances	The most recent SWMP addressing the Phase II Small MS4 General Permit effective on January 24, 2019 remains in the TCEQ review process. This BMP will be implemented upon the completion of the TCEQ approval process.



## 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)
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?  
 Yes  No

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):

\_\_\_\_\_ 137 \_\_\_\_\_

- 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: 03/17/2020

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.