

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): 2

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, 2020

Reporting period end date: (month/date/year) December 31, 2020

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

Contact Name: Tyler Spence Telephone Number: 817-743-4092

Mailing Address: 1100 Bear Creek Parkway, Keller, TX 76244

E-mail Address: tspence@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.	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	Yes, the City distributed 13,000 stormwater quality educational materials during the reporting period. This 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 2 Web Site	Yes, the City's dedicated stormwater quality webpage was updated regularly to ensure the contents are current. This dedicated stormwater quality webpage received a total of 314 page-views. A public webpage allows the City to solicit input and feedback from the public for stormwater quality issues and opportunities in the City.
1, 2, 3	BMP 3 Stormwater Reporting Line	Yes, the City staff received a total of 18 illegal discharge complaints on the stormwater reporting line. The stormwater reporting line is available on the City website. Public reporting allows residents to assist City staff with the identification of stormwater concerns and allows prompt response to the concern.
1	BMP 4 Waste Cleanup	Yes, the City, with help from volunteers and through routine street/parks cleanups, collected 26,500 bags of trash. The City also completed 129 street/culvert/inlet/channel cleanup/maintenance work orders and collected 143,238 pounds of household hazardous waste (HHW).
2	BMP 5 Illicit Discharge Prohibition/Elimination Ordinance	Yes, the City has an ordinance and code enforcement mechanisms prohibiting illicit discharges. The City issued 12 warnings during the reporting period addressing illicit discharges.
2	BMP 6 Storm Sewer System Map	Yes, the City has a storm sewer system map that is updated regularly to record new MS4 infrastructure from new development. An accurate map allows for prompt response to prevent/reduce the discharges of pollutants from the MS4.

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
2	BMP 7 IDDE Training	Yes, staff IDDE training provides the information necessary for all applicable City staff to identify stormwater concerns in the City; therefore, reducing discharge of pollutants in stormwater.
2	BMP 8 IDDE Response, Investigation, and Inspections	Yes, the City conducted 18 IDDE investigations and inspections to reduce the discharge of pollutants to stormwater.
2	BMP 9 Spill Response	Yes, the City staff responded to 6 spill events to reduce the discharge of pollutants to stormwater.
2	BMP 10 Sanitary Sewer Line Maintenance and Inspection	Yes, the City conducted 528 sanitary sewer line inspections along with maintenance activities. A total of 281,842 feet of system were cleaned and an additional 9,500 feet of system was TV-inspected to reduce the discharge of pollutants to stormwater.
2	BMP 11 OSSF Procedures	Yes, the City followed OSSF procedures. Reports of failing OSSFs are referred to Tarrant County Health Department (TCHD). An inventory of OSSFs is kept by TCHD. Two (2) OSSF complaints were filed with TCHD in 2020. TCHD inspected and addressed issues, as needed.
3	BMP 12 Erosion Control Ordinance and Requirements for Construction Site	Yes, the City has an erosion control ordinance that prohibits illicit discharges from small and large construction activities to reduce the discharge of pollutants to stormwater.
3	BMP 13 Erosion Control Plan Review	Yes, the City reviewed 127 construction/erosion control plans for compliance to reduce the discharge of pollutants to stormwater.
3	BMP 14 Construction Site Inspection and Enforcement	Yes, the City conducted 2,121 construction site inspections and 189 enforcement actions to confirm erosion and sediment controls are in place to prevent/reduce pollutants in stormwater.
3	BMP 15 Engineering and Construction Staff Training	Yes, the City inspector attended the 16-hour Certified Stormwater Inspector – Recertification course in April 2020.

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
4	BMP 16 Post-Construction Stormwater Ordinance	Yes, the City has a post-construction ordinance that addresses post-construction runoff from new development and redevelopment projects to reduce the discharge of pollutants to stormwater.
4	BMP 17 Development Review	Yes, the City staff conducted 127 new development and redevelopment reviews for adequate stormwater quality protection.
4	BMP 18 Structural Control Maintenance	Yes, the City continued to implement long-term operation and maintenance of structural stormwater control measures.
5	BMP 19 Inventory of Facilities and Stormwater Controls	Yes, the City developed and maintains an inventory of facilities and stormwater controls that it owns and operates within the regulated area of the small MS4.
5	BMP 20 Employee Training	Yes, staff training for general stormwater awareness provides the information necessary for all applicable City staff to identify stormwater concerns in the City; therefore, reducing discharge of pollutants in stormwater.
5	BMP 21 Disposal of Collected Waste	Yes, the City developed procedures to dispose of general waste material to reduce pollutants in stormwater.
5	BMP 22 Contractor Oversight Procedures	Yes, the City provided oversight of contractor activities to ensure appropriate control and housekeeping measures were used.
5	BMP 23 Municipal Operations and Maintenance Activity	Yes, City operations and maintenance activities are identified for potential to impact stormwater.
5	BMP 24 Street Sweeping	Yes, the City continued to implement a street sweeping and cleaning program for streets and areas that accumulate a large amount of stormwater pollutants. Approximately, 1,098.5 miles of City streets were swept in 2020, which removed approximately 117 cubic yards of debris from City streets.

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, 2, & 3	BMP 3 Stormwater Reporting Hotline	Log	18	Calls	Direct. Allows for direct response to location of complaint.
2	BMP 5 Illicit Discharge Prohibition/Elimination Ordinance	Enforcement	12	Warnings issued	Direct. Enforcement of illicit discharge ordinance when violators are known.
1 & 5	BMP 4 Waste Cleanup BMP 21 Disposal of Collected Waste	Volunteer trash cleanup events	2,115 330	Pounds Volunteers	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	26,500	Bags	Direct. Collection and proper disposal of pollutants

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 BMP 23 Municipal Operations and Maintenance Activity	Daily routine street cleanup	34	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	Channel maintenance	13	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	35	Completed work orders	Direct. Collection and proper disposal of pollutants

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 BMP 23 Municipal Operations and Maintenance Activity	Routine street tree limb/brush removal	47	Completed work orders	Direct. Collection and proper disposal of pollutants
1 & 5	BMP 4 Waste Cleanup BMP 21 Disposal of Collected Waste	HHW Collection	143,238	Pounds	Direct. Collection and proper disposal of pollutants
2	BMP 9 Spill Response	Spills	6	Response events	Direct. Procedure to promptly address detected discharge of pollutants.
2	BMP 10 Sanitary Sewer Line Maintenance and Inspection	Sanitary sewer	528 281,842 9,500	Inspections and improvements Feet of system cleaned Feet of system TV-inspected	Direct. Procedure to maintain system to prevent or minimize discharge of pollutants.

MCM(s)	BMP	Parameter	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Yes / No / Explain)
2	BMP 11 OSSF Procedures	Tarrant County Health Department (TCHD) Log	2 1	OSSF complaints OSSF failure (corrected by TCHD)	Direct. OSSF complaints are referred to TCHD for inspection and correction, as needed.
3	BMP 14 Construction Site Inspection and Enforcement	Construction sites Enforcement	2,121 189	Inspections Stop work orders and NOV's issued	Direct. Procedure to evaluate proper implementation and maintenance of construction site erosion control systems.
4	BMP 17 Development Review	Plans	127	Reviews	Direct. Procedure to evaluate proper design of pollutant control systems.
5	BMP 24 Street Sweeping	Street sweeper	1,098.5 117	Street miles swept Cubic yards of debris collected	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**):

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
<p>MCM 1</p> <p>BMP 1</p> <p>Distribute Educational Material</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"> (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>Met goal. Total of 13,000 stormwater quality educational materials were distributed during the reporting period.</p>
<p>MCM 1</p> <p>BMP 2</p> <p>Web Site</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"> (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>Met goal. City’s dedicated stormwater quality webpage is updated regularly to ensure the contents are current. It received a total of 314 page-views.</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, 2, 3</p> <p>BMP 3</p> <p>Stormwater Reporting Line</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 18 illegal discharge complaints on the stormwater reporting line. The stormwater reporting line is available on the City website.</p>
<p>MCM 1</p> <p>BMP 4</p> <p>Waste Cleanup</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 26,500 bags of trash collected through volunteer and routine street/parks cleanups; 129 street/culvert/inlet/channel cleanup/maintenance work orders completed; and 143,238 pounds of household hazardous waste (HHW) collected.</p>
<p>MCM 2</p> <p>BMP 5</p> <p>Illicit Discharge Prohibition/ Elimination Ordinance</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 12 warnings issued during the reporting period addressing illicit discharges.</p>

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
MCM 2 BMP 6 Storm Sewer System Map	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 MS4 infrastructure from new development.
MCM 2 BMP 7 IDDE Training	Continue IDDE training according to written procedures.	Goal not met. Due to the COVID-19 pandemic and social distancing requirements, the City was unable to complete the regularly scheduled IDDE training.
MCM 2 BMP 8 IDDE Response, Investigation, and Inspections	<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 18 IDDE investigations and inspections.
MCM 2 BMP 9 Spill Response	<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 6 spill events.

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
<p>MCM 2</p> <p>BMP 10</p> <p>Sanitary Sewer Line Maintenance and Inspection</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 528 sanitary sewer line inspections and maintenance conducted; 281,842 feet of system cleaned; 9,500 feet of system TV-inspected.</p>
<p>MCM 2</p> <p>BMP 11</p> <p>OSSF Procedures</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 (TCHD). An inventory of OSSFs is kept by TCHD. Two (2) OSSF complaints were filed with TCHD in 2020. TCHD inspected and addressed issues, as needed.</p>
<p>MCM 3</p> <p>BMP 12</p> <p>Erosion Control Ordinance and Requirements for Construction Site Contractors</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>

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
MCM 3 BMP 13 Erosion Control Plan Review	Continue construction site plan review procedures.	Met goal. There were 127 construction/erosion control plan reviews conducted by city staff.
MCM 3 BMP 14 Construction Site Inspection and Enforcement	Continue implementing construction site inspection and enforcement procedures, including documentation of the inspections and enforcement activities.	Met goal. There were 2,121 construction site inspections conducted and 189 enforcement actions.
MCM 3 BMP 15 Engineering and Construction Staff Training	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 inspector attended the 16-hour Certified Stormwater Inspector – Recertification course in April 2020.
MCM 4 BMP 16 Post-Construction Stormwater Ordinance	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.
MCM 4 BMP 17 Development Review	Implement the design review process.	Met goal. There were 127 new development and redevelopment reviews for adequate stormwater quality protection conducted by city staff.

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
<p>MCM 4</p> <p>BMP 18</p> <p>Structural Control Maintenance</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>BMP 19</p> <p>Inventory of Facilities and Stormwater Controls</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>BMP 20</p> <p>Employee Training</p>	<p>Conduct BMP training for the municipal employees responsible for activities that may impact stormwater quality.</p>	<p>Goal not met. Due to the COVID-19 pandemic and social distancing requirements, the City was unable to complete the regularly scheduled IDDE training.</p>
<p>MCM 5</p> <p>BMP 21</p> <p>Disposal of Collected Waste</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>

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
<p>MCM 5</p> <p>BMP 22</p> <p>Contractor Oversight Procedures</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>
<p>MCM 5</p> <p>BMP 23</p> <p>Municipal Operations and Maintenance Activity</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>Goal partially met. City has implemented procedures to perform assessments on municipal operation and establishing measures that will reduce the discharge of pollutants into stormwater. Informal visual inspections are conducted as City staff are onsite. However, a formal assessment was not conducted in 2020.</p>

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
MCM 5 BMP 24 Street Sweeping	Continue street sweeping program for City streets, and implement supplemental activities, as needed, according to the evaluation.	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. Approximately, 1,098.5 miles of City streets were swept in 2020, which removed approximately 117 cubic yards of debris from City streets.

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, 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 2020 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 2 Stormwater Activities
1	<p>BMP 1 Distribute Educational Material</p>	<p>Measurable Goal 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>BMP 2 Web Site</p>	<p>Measurable Goal 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 2 Stormwater Activities
1, 2, 3	BMP 3 Stormwater Reporting Line	<p>Measurable Goal</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	BMP 8 IDDE Response, Investigation, and Inspections	<p>Measurable Goal</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	BMP 10 Sanitary Sewer Line Maintenance and Inspection	<p>Measurable Goal</p> <p>Conduct sanitary sewer inspections.</p> <p>Observe for opportunities to:</p> <ul style="list-style-type: none"> (i) Make improvements to sanitary sewers to reduce overflows; (ii) Address lift station inadequacies; (iii) Improve reporting of overflows; and (iv) Strengthen sanitary sewer use requirements to reduce blockage from fats, oils, and grease.
2	BMP 11 OSSF Procedures	<p>Measurable Goal</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>

3. 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.

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 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:

Description of bacteria-focused BMP	Comments/Discussion
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 26,641 bags of trash collected through volunteer and routine street/parks cleanup activities; 129 work orders completed for debris removal and maintenance of streets, culverts, inlets, and channels; 143,238 pounds of household hazardous waste (HHW) collected. There were 528 sanitary sewer line inspections and maintenance conducted; 281,842 feet of sanitary sewer system cleaned and 9,500 feet of sanitary sewer system TV-inspected.
Reduction in illegal dumping	Out of 18 illegal dumping violations reported, there were only 12 illegal discharge activities confirmed.
Number of educational opportunities conducted	<p>A total of 13,000 stormwater and 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 four (4) links are accessible on the City's stormwater web page. The stormwater web page was updated and is available for public view. In 2020 the stormwater web page received a total of 314 webpage views.</p>
Reductions in sanitary sewer overflows (SSOs)	There were two (2) 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 13,000 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	<p>Distribute educational material about stormwater pollution prevention and the hazards associated with illegal discharges and improper disposal of waste by December of 2021.</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 2021.</i></p>
1, 2, & 3	2	Stormwater Reporting by Public	<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>

MCM(s)	BMP	Stormwater Activity	Description/Comments
1	3	Public Involvement Opportunities	<p>Facilitate public involvement and education for stormwater pollution prevention activities by December of 2021.</p> <p>(i) Provide at least 2 public involvement opportunities for stormwater pollution prevention.</p> <p>(ii) Engage at least 2 target audiences.</p> <p>Consider and facilitate public input in the implementation of the program.</p> <p>(i) Provide one opportunity for public to provide feedback on the SWMP during the public comment period.</p>
2 & 5	4	Storm Sewer System Map and Facility Inventory	<p>Evaluate the existing map of the City's MS4 system, including the inventory of City-owned facilities and structural controls as defined in the permit.</p> <p>(i) Document updates needed to map in one memo, or equivalent, to file by December of 2021.</p> <p>Update the map of the City's MS4 system to include 100% of known stormwater outfalls discharging to Waters of the U.S. by December of 2021.</p> <p>Update the facility inventory to include 100% of known City-owned facilities and structural controls by December of 2021.</p>

MCM(s)	BMP	Stormwater Activity	Description/Comments
2	5	Illicit Discharge Prohibition/Elimination Ordinance	<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 2021.</i></p>
2	6	OSSF Procedures	<p>Evaluate current program to prevent and correct failing on-site septic facilities.</p> <p>(i) Document results of evaluation in one memo, or equivalent, to file by December of 2021.</p> <p>Create one inventory of 100% of known On-site Sewage Facilities (OSSF) within the MS4 area by December of 2021.</p>
3 & 4	7	Plan Review	<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>

MCM(s)	BMP	Stormwater Activity	Description/Comments
2 & 3	8	Construction Site Inspection and Enforcement	<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>

MCM(s)	BMP	Stormwater Activity	Description/Comments
4	9	Structural Control Maintenance, Inspection, and Enforcement	<p>Evaluate the City’s current program for structural control inspection and maintenance and enforcement of maintenance requirements for privately-owned post-construction BMPs.</p> <p>(i) Document results of evaluation and identify “priority” structural controls (e.g. sensitivity of receiving waters, history of illegal dumping, and recurring issues) in one memo, or equivalent, to file by December of 2021.</p> <p>Continue and/or implement requirements for deed-recorded maintenance plans for privately-owned structural controls.</p> <p>(i) Record 100% of maintenance agreements for new privately-owned post-construction BMPs prior to final acceptance.</p> <p>(ii) Document enforcement action for post-construction requirements at privately-owned post-construction BMPs by December of 2021.</p>
5	10	Maintenance Contractor Oversight	<p>Utilize standard contract language requiring compliance with City stormwater pollution prevention measures, good housekeeping practices, and facility specific stormwater management.</p> <p>Investigate stormwater quality reports concerning contracted maintenance activities within 2 business days of receipt of report.</p> <p>(i) Maintain one copy of inspection documentation notes and follow-up actions, as necessary.</p>

MCM(s)	BMP	Stormwater Activity	Description/Comments
5	11	Municipal Operations and Maintenance Activity	<p>Evaluate each operation and maintenance activity performed by the City and identify pollutants of concern associated with these activities.</p> <p>(i) Document results of evaluation and identify operations and maintenance activities performed by the City in one memo, or equivalent, to file by December of 2021.</p>
5	12	Municipal Operations Inspection Program and Procedures	<p>Evaluate the City's current procedures for visual inspections of pollution prevention measures at City-owned facilities by December of 2021.</p> <p>(i) Document in one memo, or equivalent, to file additional staff or program needs to meet permit requirements or City goals.</p> <p>Develop written procedures for visual inspection of pollution prevention measures at City-owned facilities by December of 2021.</p> <p>(i) Create one standard inspection checklist. (ii) Create one list of pollution prevention measures to be inspected.</p>
5	13	Disposal of Collected Waste	<p>Dispose of waste material in accordance with Title 30 of Texas Administrative Code Chapters 330 or 335, as applicable.</p> <p>(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 2021.</p>
5	14	Street Sweeping (Roadway Pollution Prevention)	<p>Conduct street sweeping activities for City-owned roadways and parking lots according to established procedures.</p> <p>(i) Maintain a schedule/log of sweeper activity; record 100% of entries by December of 2021.</p>

MCM(s)	BMP	Stormwater Activity	Description/Comments
2, 3, & 5	15	Staff Training	<p>Conduct training for staff with responsibilities relating to activities with potential impacts to stormwater quality.</p> <p>(i) Provide general awareness-level training for pollution prevention and good housekeeping to staff at least once annually.</p> <p>(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.</p> <p>(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.</p> <p>(iv) Maintain one copy of training documentation onsite or in SWMP by December of 2021.</p>
2, 3, & 4	16	Stormwater Quality Ordinances	<p>Evaluate the City's current ordinances for compliance with illicit discharge prohibition, construction site stormwater runoff control, and post-construction permit requirements by December of 2021.</p> <p>(i) Document the results of the evaluation in one memo, or equivalent, to file.</p> <p>Update or adopt municipal ordinances as deemed necessary through the ordinance evaluation to comply with illicit discharge prohibition, construction site stormwater runoff control, and post-construction permit requirements by December of 2021.</p>

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?
 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):

_____ 127 _____

- 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.