

# 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): 3

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, 2021

Reporting period end date: (month/date/year) December 31, 2021

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

Contact Name: Marcelo Saavedra Telephone Number: 817-743-4092

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

E-mail Address: msaavedra@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 most recent SWMP addressing the Phase II Small MS4 General Permit effective January 24, 2019 remains in the TCEQ review process.
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>		

3. 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**):

<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>
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.
2 & 5	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.

<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 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.

<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>
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.

4. 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	BMP 1 Distribute Educational Material	Educational Material Distributed	9 2 6 5 50,908 26,040 353	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 14	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 2 40 535 32,000	Opportunities Target Audiences Adopted streets Participants Lbs. 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.

<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	BMP 4 Storm Sewer System Map and Facility Inventory	MS4 map evaluation	1	Evaluation	Yes. Maintains current mapping and inventory files regarding the MS4 system.
2	BMP 5 Illicit Discharge and Spill Inspection, Investigation, and Response	Discharge/spill response	14 12 8 0 162 166,186.71 11,979	Spill response events NOVs issued Spills 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	1 1 1 1 0	Program Evaluation Inventory OSSF complaints OSSF inspections OSSF failures (corrected by TCHD)	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	172	Reviews	Yes. Procedure to evaluate proper design of pollutant control systems.

<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 & 3	BMP 8 Construction Site Inspection and Enforcement	Construction site enforcement	5,675 46	Inspection reports Stop work orders	Yes. Procedure to evaluate proper implementation and maintenance of construction site erosion control systems.
4	BMP 9 Structural Control Maintenance, Inspection, and Enforcement	Stormwater structural controls	1 1	Program Evaluation Memo Enforcement action	Yes. Procedure to evaluate the use of proper stormwater structural controls.
5	BMP 10 Maintenance Contractor Oversight	Contracted maintenance activities	0 0	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	1	Evaluation memo	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 1 1	Memo for additional staff and program needs Inspection checklist List of pollution prevention measures	Yes. Procedure to maintain system to prevent or minimize discharge 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>
5	BMP 13 Disposal of Collected Waste	Waste removal records	0 101 26,400 117,130	Sanitary sewer overflows Completed work orders Lbs. of municipal waste Lbs. of waste collected (CWD)	Yes. Collection and proper disposal of pollutants.
5	BMP 14 Street Sweeping (Roadway Pollution Prevention)	Street sweeper	993.6 674	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	5 1 46	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	1	Evaluation Checklist	Yes. Procedure to maintain system to prevent or minimize discharge of pollutants.

5. 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>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>	<p>Met goal. Stormwater topics included pollution, bacteria, waste, water conservation, pet waste, yard care, and fat/oil/grease concerns. 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>

<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, &amp; 3</p> <p><b>BMP 2</b></p> <p><b>Stormwater Reporting by Public</b></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. Two stormwater quality reports were submitted to the City through the webpage in 2021 and were responded to within 2 business days of receipt. No bacteria related reports were received.</p>
<p>MCM 1</p> <p><b>BMP 3</b></p> <p><b>Public Involvement Opportunities</b></p>	<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>	<p>Met goal. City facilitated two Park Cleanup events and an Adopt-A-Street program in 2021 for public involvement. The spring Park Cleanup event had 202 participants and the fall event had 333 participants. Participants included City employees, residents, and children.</p> <p>The SWMP public notice is pending and the public comment period has not started.</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 2 &amp; 5</p> <p><b>BMP 4</b></p> <p><b>Storm Sewer System Map and Facility Inventory</b></p>	<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>	<p>Partially met goal. The City updated 100% of known outfalls and City-owned facilities on two separate maps. Updates are documented on the map and were made on 12/27/2021.</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 2</p> <p><b>BMP 5</b></p> <p><b>Illicit Discharge Prohibition/ Elimination Ordinance</b></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 2021.</i></p>	<p>Met goal. City staff responded to 100% of spill notifications and illicit discharges within 2 business days. No TCEQ notifications were required.</p> <p>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>
<p>MCM 2</p> <p><b>BMP 6</b></p> <p><b>OSSF Procedures</b></p>	<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>	<p>Met goal. City evaluated their OSSF program and new application list on 11/10/21. Reports of failing OSSFs are referred to Tarrant County Health Department (TCHD). TCHD provided an inventory of OSSFs to the City for their records. One OSSF complaint was filed with TCHD in 2021. TCHD inspected and addressed issues, as needed.</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 3 &amp; 4</p> <p><b>BMP 7</b></p> <p><b>Plan Review</b></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 &amp; 3</p> <p><b>BMP 8</b></p> <p><b>Construction Site Inspection and Enforcement</b></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>

<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 9</b></p> <p><b>Structural Control Maintenance, Inspection, and Enforcement</b></p>	<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>	<p>Met goal. City has developed an evaluation memo stating that maintenance of privately owned stormwater structural controls are included in the Plats to be the property owner's responsibility. Enforcement action is recorded and maintained for documentation.</p>
<p>MCM 5</p> <p><b>BMP 10</b></p> <p><b>Maintenance Contractor Oversight</b></p>	<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>	<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 2021.</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 11</b></p> <p><b>Municipal Operations and Maintenance Activity</b></p>	<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>	<p>Met goal. City staff evaluated city activities and potential pollutants that may exist.</p>
<p>MCM 5</p> <p><b>BMP 12</b></p> <p><b>Municipal Operations Inspection Program and Procedures</b></p>	<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.</p> <p>(ii) Create one list of pollution prevention measures to be inspected.</p>	<p>Met goal. City evaluated the program and determined no additional staffing is needed. The City utilizes a standard inspection checklist and list of pollution prevention measures to be inspected.</p>
<p>MCM 5</p> <p><b>BMP 13</b></p> <p><b>Disposal of Collected Waste</b></p>	<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>	<p>Met goal. City performed 101 work orders; specifically, 42 for tree limb removal, 21 for storm inlet and culvert maintenance, 7 for channel maintenance and 31 for daily street cleanup. All municipal waste is collected and disposed of by Community Waste Disposal.</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 14</b></p> <p><b>Street Sweeping (Roadway Pollution Prevention)</b></p>	<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>	<p>Met goal. City logged 100% of street sweeping activities in 2021 using the work order system.</p>
<p>MCM 2, 3, &amp; 5</p> <p><b>BMP 15</b></p> <p><b>Staff Training</b></p>	<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>	<p>Met goal. The City conducted an annual Stormwater Pollution and Illicit Discharge Detection &amp; Elimination training on 6/25/21. Five City employees completed job specific recertification courses in 2021.</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 2, 3, &amp; 4</p> <p><b>BMP 16</b></p> <p><b>Stormwater Quality Ordinances</b></p>	<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>	<p>Met goal. City completed an Ordinance(s) or Other Regulatory Mechanism(s) Review Checklist on 12/21/2021.</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, 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**

<b>MCM(s)</b>	<b>Focused BMPs for Bacteria</b>	<b>Permit Year 3 Stormwater Activities</b>
1	<p><b>BMP 1</b> Distribute Educational Material</p>	<p><b>Measurable Goal</b> Distribute educational material about stormwater pollution prevention and the hazards associated with illegal discharges and improper disposal of waste by December of 2021. (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.</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	<p><b>BMP 2</b> Stormwater Reporting by Public</p>	<p><b>Measurable Goal</b> 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 3 Stormwater Activities
2	<p><b>BMP 5</b>            Illicit Discharge and Spill Inspection, Investigation, and Response</p>	<p><b>Measurable Goal</b>            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.            (iii) <i>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	<p><b>BMP 6</b>            OSSF Procedures</p>	<p><b>Measurable Goal</b>            Evaluate current program to prevent and correct failing on-site septic facilities.            (i) Document results of evaluation in one memo, or equivalent, to file by December of 2021.             Create one inventory of 100% of known On-site Sewage Facilities (OSSF) within the MS4 area by December of 2021.</p>

3. 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:

<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 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 <b>28,000</b> bags of trash collected through volunteer and routine street/parks cleanup activities; <b>101</b> work orders completed for debris removal and maintenance of streets, culverts, inlets, and channels; <b>117,130</b> pounds of waste collected and disposed of. There were <b>162</b> sanitary sewer line inspections and maintenance conducted; <b>166,187</b> feet of sanitary sewer system cleaned and <b>11,979</b> feet of sanitary sewer system TV-inspected.
Reduction in illegal dumping	Out of <b>14</b> illegal dumping violations reported, there were only <b>12</b> illegal discharge activities confirmed.
Number of educational opportunities conducted	<p>A total of <b>26,040</b> bacteria related educational materials were distributed. 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>two (2)</b> links are accessible on the City's stormwater web page. The stormwater web page was updated and is available for public view. In 2021 the stormwater web page received a total of <b>353</b> web page views.</p>
Reductions in sanitary sewer overflows (SSOs)	There were <b>zero (0)</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>24,206</b> 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><b>Measurable Goal:</b></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> <ul style="list-style-type: none"> <li>i. Develop and distribute educational material for <u>at least 3 stormwater pollution prevention topics.</u></li> <li>ii. <u>Utilize at least 3 methods of distribution.</u></li> <li>iii. <u>Reach at least 3 target audiences.</u></li> </ul> <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>

MCM(s)	BMP	Stormwater Activity	Description/Comments
1,2, & 3	2	Stormwater Reporting by Public	<p><b>Measurable Goal:</b></p> <p>A. Facilitate public reporting of stormwater quality concerns and illicit discharges.</p> <ul style="list-style-type: none"> <li>i. Maintain <u>at least 1 mechanism</u> for the public to submit stormwater quality reports.</li> <li>ii. Ensure the stormwater reporting mechanism is publicly accessible <u>at least 95%</u> of the time.</li> <li>iii. Respond to stormwater quality reports <u>within 2 business days</u>; if the public report concerns an immediate threat to human health or the environment, respond <u>within 24 hours</u> of notification.</li> <li>iv. <i>Targeted BMP for Bacteria: Respond to stormwater quality reports specific to bacteria reduction (e.g. SSO's) <u>within 1 business day.</u></i></li> </ul>
1	3	Public Involvement Opportunities	<p><b>Measurable Goal:</b></p> <p>A. Facilitate public involvement and education for stormwater pollution prevention activities by <u>December of each year.</u></p> <ul style="list-style-type: none"> <li>i. Provide <u>at least 2 public involvement opportunities</u> for stormwater pollution prevention.</li> <li>ii. Engage <u>at least 2 target audiences.</u></li> </ul> <p>B. Consider and facilitate public input in the implementation of the program.</p> <ul style="list-style-type: none"> <li>i. Provide <u>one opportunity</u> for public to provide feedback on the SWMP during the public comment period.</li> </ul>

MCM(s)	BMP	Stormwater Activity	Description/Comments
2 & 5	4	Storm Sewer System Map and Facility Inventory	<p><b>Measurable Goal:</b></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 <u>by December of each year.</u></p>
2	5	Illicit Discharge and Spill Inspection, Investigation, and Response	<p><b>Measurable Goal:</b></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> <p>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.</p> <p>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.</p> <p>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></p>

MCM(s)	BMP	Stormwater Activity	Description/Comments
2	6	OSSF Procedures	<p><b>Measurable Goal:</b></p> <ul style="list-style-type: none"> <li>A. Maintain <u>one copy</u> of inventory of known OSSF within the MS4 area.</li> <li>B. Refer <u>100% of known</u> reports of failing on-site septic facilities to jurisdictional authority.</li> <li>C. Request <u>one copy</u> of the OSSF inspection reports from jurisdictional authority <u>by December of each year</u>.</li> </ul>
3 & 4	7	Plan Review	<p><b>Measurable Goal:</b></p> <ul style="list-style-type: none"> <li>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"> <li>i. Review <u>100%</u> of plans submitted to the City prior to final acceptance of plans.</li> <li>ii. Maintain <u>one copy</u> of final plan review documentation for <u>100%</u> of approved construction plans.</li> </ul> </li> </ul>

MCM(s)	BMP	Stormwater Activity	Description/Comments
2 & 3	8	Construction Site Inspection and Enforcement	<p><b>Measurable Goal:</b></p> <ul style="list-style-type: none"> <li>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"> <li>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).</li> <li>ii. Maintain <u>one copy</u> of each completed construction site inspection report.</li> </ul> </li> <li>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"> <li>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>.</li> </ul> </li> </ul>

MCM(s)	BMP	Stormwater Activity	Description/Comments
4	9	Structural Control Maintenance, Inspection, and Enforcement	<p><b>Measurable Goal:</b></p> <ul style="list-style-type: none"> <li>A. Continue inspections of City-owned priority water quality structural controls according to written procedures. <ul style="list-style-type: none"> <li>i. Inspect <u>100%</u> of City-owned priority water quality structural controls <u>by the end of the permit term.</u></li> </ul> </li> <li>A. Continue and/or implement requirements for deed-recorded maintenance plans for privately-owned structural controls. <ul style="list-style-type: none"> <li>i. Record <u>100%</u> of maintenance agreements for new privately-owned post-construction BMPs prior to final acceptance.</li> <li>ii. Document enforcement action for post-construction requirements at privately-owned post-construction BMPs <u>by December of each year.</u></li> </ul> </li> </ul>

MCM(s)	BMP	Stormwater Activity	Description/Comments
5	10	Maintenance Contractor Oversight	<p><b>Measurable Goal:</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>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"> <li>i. Maintain <u>one copy</u> of inspection documentation notes and follow-up actions, as necessary.</li> </ul> </li> </ul>
5	11	Municipal Operations and Maintenance Activity	<p><b>Measurable Goal:</b></p> <ul style="list-style-type: none"> <li>A. Continue to perform existing operations and maintenance activities according to established procedures to reduce the discharge of pollutants from the activities.</li> <li>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.</li> </ul>

MCM(s)	BMP	Stormwater Activity	Description/Comments
5	12	Municipal Operations Inspection Program and Procedures	<p><b>Measurable Goal:</b></p> <p>A. Begin visual inspection of pollution prevention measures at City-owned facilities according to written procedures.</p> <ul style="list-style-type: none"> <li>i. Inspect <u>100%</u> of pollution prevention measures <u>by the end of the permit term.</u></li> <li>ii. Maintain <u>one completed inspection checklist</u> for each facility.</li> </ul>
5	13	Disposal of Collected Waste	<p><b>Measurable Goal:</b></p> <p>A. Dispose of waste material in accordance with Title 30 of Texas Administrative Code Chapters 330 or 335, as applicable.</p> <ul style="list-style-type: none"> <li>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></li> </ul>
5	14	Street Sweeping (Roadway Pollution Prevention)	<p><b>Measurable Goal:</b></p> <p>A. Conduct street sweeping activities for City-owned roadways and parking lots according to established procedures.</p> <ul style="list-style-type: none"> <li>i. Maintain a schedule/log of sweeper activity; <u>record 100% of entries by December of each year.</u></li> </ul>



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

\_\_\_\_\_ 22 \_\_\_\_\_

- 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.