TEXAS STATE UNIVERSITY

The rising STAR *of Texas*

Stormwater Management Program

For MS4 General Permit TXR040000

EXECUTIVE SUMMARY

In response to the 1987 amendments to the Clean Water Act (CWA), the U.S. Environmental Protection Agency (EPA) initiated a comprehensive, two-phase approach to stormwater quality. On November 15, 1990, the EPA published Phase I of the National Pollutant Discharge Elimination System (NPDES) program. Phase I required permit coverage for stormwater discharges from medium and large municipal separate storm sewer systems (MS4s) with populations of 100,000 or more and several categories of industrial activities, including construction sites that disturb five or more acres of land. Phase I of the NPDES program addressed sources of stormwater runoff with the greatest potential to impact water quality. On December 8, 1999, the EPA published Phase II of the NPDES program requiring that small MS4s with populations less than 100,000 and construction activities disturbing between one and five acres of land obtain permit coverage.

In 1998, the EPA delegated regulatory authority to the Texas Commission on Environmental Quality (TCEQ) to issue MS4 stormwater permits. As a regulatory entity, the TCEQ developed the Texas Pollutant Discharge Elimination System (TPDES) program, a program patterned after the federal NPDES stormwater program.

On August 13, 2007, the TCEQ issued TPDES General Permit No. TXR040000 for stormwater discharges from regulated cities in Texas. The permit was renewed and adopted on December 13, 2013 and again on January 16, 2019. In accordance with the permit requirements, regulated entities have 180 days to file for coverage under the General Permit by filing a Notice of Intent (NOI) and submitting a Stormwater Management Program (SWMP) for review and approval. Permittees have five years to fully implement all elements of the SWMP (January 2024). Permittees are required to submit annual reports to the TCEQ during the permit period.

The current TPDES General Permit provides different compliance obligations based on the population served by the MS4 during the 2010 Census. The City of

San Marcos is designated as a Level III Phase 2 MS4, based on the 2010 Census population of 44,894. Texas State University is a "non-traditional" MS4 located within the City of San Marcos Urbanized Area (UA). As a non-traditional MS4, the University does not have the authority to pass ordinances nor does it have the same enforcement authority that a traditional MS4 would have. Texas State University has implemented a clear enforcement/escalation process to address compliance issues and will continue to notify the City of San Marcos or the TCEQ of discharges or incidents that it could not enforce against itself.

The University is required to reduce the discharge of pollutants to waters of the United States to the "maximum extent practicable" (MEP) in order to protect water quality. At a minimum, the permit will require a SWMP that addresses the following issues:

- Identify and implement Best Management Practices (BMPs) for applicable minimum control measures (MCMs);
- Identify measurable goals for the control measures;
- Develop an implementation schedule for the control measures; and
- Define the responsible entity to implement the control measures.

Having already qualified for permit coverage in 2013, the MS4 must review and renew its SWMP that describes the BMPs they will develop and implement to minimize the discharge of pollutants from the MS4 to the maximum extent practicable. Level 2 MS4s, including Texas State University, are not required to address Industrial Stormwater Sources (MCM 6) within the SWMP. The five applicable MCMs as defined by the TCEQ are as follows:

- Public Education, Outreach and Involvement
- Illicit Discharge Detection and Elimination
- Construction Site Stormwater Runoff Control
- Post-construction Stormwater Management in New Development and Redevelopment
- Pollution Prevention and Good Housekeeping for Municipal Operations

In order to fulfill permit requirements, several University departments may play a vital role in the implementation of the SWMP. Departments that may be involved are listed in Section 1.2 Key Personnel. Other departments may also be involved in implementing the SWMP at various times throughout the permit cycle.

TABLE OF CONTENTS

APPENDICES

LIST OF TABLES

SECTION 1 - OVERVIEW

1.1 ENVIRONMENTAL SETTING

Texas State University (Texas State) is a four-year accredited university located at 601 University Drive in San Marcos, Texas (see Area Map in Figure 1). The University serves a student population of greater than 38,000, in addition to serving over 3,700 faculty and staff, and has seen continuous growth each year. The Main Campus encompasses over 500 acres and lies within the drainage basin of the San Marcos River with ground elevation changes of 230 feet. Stormwater drains into nearby Sessom Creek, the San Marcos River, and the City of San Marcos' MS4.

Figure 2 shows the location of the Main Campus relative to waterways, roads, and inhabited areas. It also shows the general direction of stormwater surface flow. **Figure 3** depicts the locations of campus MS4 outfalls relative to the San Marcos River and Sessom Creek. Figure 3 also shows stormwater drainage pipe in different colors to indicate which areas drain into each MS4 outfall.

Surface water flow from the west side of campus is primarily along Ranch Road 12 (Texas 80) into the City of San Marcos' MS4, through drainage channels and storm sewer piping, then to Purgatory Creek. The flow enters Purgatory Creek about 2 miles south of the campus near Guadalupe Street and the railroad tracks. Purgatory Creek ultimately discharges to the San Marcos River.

Surface water flow from the north and northeast side of campus is overland flow toward Sessom Creek, then into a stormwater detention pond constructed jointly by Texas State and the City of San Marcos. Stormwater collected in this detention pond is discharged into Sessom Creek. Sessom Creek is an intermittent spring-fed creek that flows along Sessom Drive from west of North LBJ to the confluence with the San Marcos River. Several ponds located near University Drive (remnants of an inactive Fish Hatchery) collect runoff from the JC Kellam Administration Building Parking Lots only and are part of the drainage that

comprises Sessom Creek. Sessom Creek ultimately discharges to the San Marcos River near the intersection of Sessom Drive and Aquarena Springs Drive, just upstream of Sewell Park.

Surface water flow from the central portion of the campus flows into stormwater inlets that carry the water to a large outfall at the San Marcos River downstream of Sewell Park and across from City Park.

1.1.1 Environmentally Sensitive Areas

Environmentally sensitive areas at Texas State include the headwaters of the San Marcos River, areas within the Edwards Aquifer Recharge Zone (EARZ), and critical habitat areas for federal and state listed threatened and endangered species. The headwaters of the San Marcos River, Spring Lake, is located near the Meadows Center for Water and the Environment on the northeast side of the campus.

Areas within the EARZ are shown in **Figure 4** and include a small area at Spring Lake and the University Print Shop/West Warehouse on Old Ranch Road 12 (Texas 80). A Water Pollution Abatement Plan (WPAP), as required by the Edwards Aquifer Rule (30 TAC Chapter 213), will be prepared and approved by the TCEQ, prior to the start of any regulated activity over these areas. There are no areas of campus on the Contributing Zone.

Texas State University is one of five signatories to the Edwards Aquifer Habitat Conservation Plan and associated Incidental Take Permit under the Endangered Species Act. An approved Habitat Conservation Plan (HCP) is in effect to provide assurance for covered species and suitable habitat within the San Marcos and Comal Springs. Texas State is contracted through the HCP to improve and expand Texas wild rice habitat in the San Marcos River. This includes the removal of non-native species of aquatic vegetation and the planting of native species such as Texas wild rice. Texas State University MS4 discharges into the San Marcos River and portions of the Edwards Aquifer, which contain the following threatened or endangered species (protected under the EAHCP):

Species	Status	Waterbody
Comal Springs dryopid beetle (Stygoparnus comalensis)	Endangered	Edwards Aquifer
Comal Spring riffle beetle (Heterelmis comalensis)	Endangered	
San Marcos salamander (Eurycea nana)	Threatened	
Texas wild-rice (Zizania texana)	Endangered	Spring Lake in Hays County
San Marcos gambusia (Gambusia georgei)	Endangered	
Fountain darter (Etheostoma fonticola)	Endangered	
Texas Blind Salamander (Eurycea rathbuni)	Endangered	Water-filled caves of the Edwards Aquifer

1.1.2 Clean Water Act 303d Impairment

The Upper San Marcos River (Section 1814) of the Guadalupe River Basin was listed in 2010 as impaired on the 303d list of the Texas Integrated Report for the Clean Water Act (CWA). The impairment was for elevated Total Dissolved Solids (TDS). As of the 2014 Texas Integrated Report – Texas 303(d) List the Upper San Marcos River is no longer listed as impaired.

1.1.3 Objective

The objective of this stormwater management program is to allow sustainable campus growth while minimizing negative impacts from stormwater to receiving water bodies, the Edwards Aquifer, and areas protected by the HCP.

1.2 KEY PERSONNEL

The Texas State University Finance and Support Services (FSS) Division has the primary responsibility to implement the Stormwater Management Program under

the MS4 General Permit. Departments and employees within the FSS Division, in addition to the Division of Student Affairs and Athletics Department, will provide support and resources to meet the requirements outlined in this program. Other Divisions and Departments may be called upon at various times throughout the permit cycle to support NPDES permit compliance needs.

Texas State departments play a vital role in implementation of the Stormwater Management Program (SWMP), as they have the ability to perform and will continue to perform many of the elements outlined in the SWMP. Responsible Departments include but are not limited to the following:

- Environmental Health, Safety and Risk Management (EHSRM)
- Utilities Operations
- Grounds and Waste Management
- Facilities Operations
- Facilities Planning, Design and Construction (FPDC)
- Facilities Management
- Auxiliary Services
- Department of Housing and Residential Life (DHRL)
- Materials Management and Logistics
- Transportation Services
- Campus Recreation
- Athletics
- Student Involvement @ LBJSC

1.3 STORMWATER REGULATION

On August 13, 2007, the TCEQ issued TPDES General Permit No. TXR040000 for stormwater discharges from Phase II cities in Texas. This permit was renewed on December 13, 2013 and again on January 16, 2019. The current permit designates permit applicability based on UAs defined by the 2010 census. The San Marcos UA is shown as yellow shading in **Figure 1** while Texas State properties are shown in red. Only areas within the UA that are associated with the Main Campus are included within the Texas State MS4 Permit and this SWMP. The STAR Park

Campus, Round Rock Campus, Freeman Ranch, Rattle Snake Cave, University Camp, Muller Farm, the ALERRT Center, and the University Distribution Center are not considered Main Campus areas and are not covered by this SWMP.

Texas State is a Level 2, non-traditional MS4 (Part II Section B.5.(b)). In accordance with the permit requirements, Texas State must reapply for permit coverage within 180 days of the permit issuance date (January 24, 2019) and has five years to fully implement this revised SWMP. The University is also required to continue to submit annual reports to the TCEQ throughout the permit period. Annual reports must include progress on measurable goals made during the previous year and must be submitted to the TCEQ executive director within 90 days of the end of each reporting year. The University may choose to report based on permit year, calendar year, or fiscal year.

1.4 AUTHORITY OF THE UNIVERSITY TO IMPLEMENT AND ENFORCE MCMs AND BMPs

As a Level 2, non-traditional MS4, Texas State shall exert enforcement authority as required by the general permit for its facilities, employees, contractors, or other entity over which it has operational control within the portion of the UA under the jurisdiction of the permittee (Main Campus).

At a minimum, Texas State utilizes the following supporting documents or policies to address the following:

1. Authority to prohibit illicit discharges and illicit connections;
    a. University Policy and Procedures (UPPS) No. 04.05.16: Campus Stormwater Management, Section 03.01 – Illicit Discharge Detection & Elimination (IDDE)
2. Authority to respond to and contain other releases – Control the discharge of spills, and prohibit dumping or disposal of materials other than stormwater into the small MS4;
    a. Spill Prevention Control and Countermeasures Plan (SPCC), and
    b. Hazardous Materials and Hazardous Waste Management Plan

3. Authority to require compliance with conditions in the permittee's ordinances, permits, contracts, or orders;
    a. UPPS No. 04.05.16: Campus Stormwater Management, Section 05 – MS4 Compliance Inspections, Non-Compliance, and Violations
4. Authority to require installation, implementation, and maintenance of control measures;
    a. UPPS No. 04.05.16: Campus Stormwater Management, Section 03.02 – Construction Site Stormwater Runoff Control, and
    b. UPPS No. 04.05.16: Campus Stormwater Management, Section 03.03 – Post-Construction Stormwater Management in New Development in Redevelopment
    c. UPPS No. 04.05.16: Campus Stormwater Management, Section 04 – Procedures for Contractor Compliance with MS4 Requirements
5. Authority to receive and collect information, such as stormwater plans, inspection reports, and other information deemed necessary to assess compliance with this permit, from operators of construction sites, new or redeveloped land, and industrial and commercial facilities;
    a. UPPS No. 04.05.16: Campus Stormwater Management, Section 03.02 – Construction Site Stormwater Runoff Control,
    b. UPPS No. 04.05.16: Campus Stormwater Management, Section 03.04 – Post-Construction Stormwater Management in New Development in Redevelopment,
    c. UPPS No. 04.05.16: Campus Stormwater Management, Section 05 – MS4 Compliance Inspections, Non-Compliance, and Violations
6. Authority, as needed, to enter and inspect private property including facilities, equipment, practices, or operations related to stormwater discharges to the small MS4;
    a. Texas Water Code 26.173 Power to Enter Property
7. Authority to respond to non-compliance with BMPs required by the small MS4 consistent with their ordinances or other regulatory mechanism(s);
    a. UPPS No. 04.05.16: Campus Stormwater Management, Section 05 – MS4 Compliance Inspections, Non-Compliance, and Violations
8. Authority to assess penalties, including monetary, civil, or criminal

penalties;

a. UPPS No. 04.05.16: Campus Stormwater Management, Section 05 – MS4 Compliance Inspections, Non-Compliance, and Violations

9. Ability to enter into interagency or interlocal agreements or other maintenance agreements, as necessary.
    a. Texas State will notify the City of San Marcos or TCEQ Region 11 to report discharges or incidents that it cannot itself enforce against.

SECTION 2 - STORMWATER MANAGEMENT PROGRAM OVERVIEW

2.1 DEVELOPMENT OF THE SWMP

The TPDES permit requires the permittee to select appropriate BMPs for each of five MCMs. A sixth MCM is not required by Level 2 MS4s (Industrial Stormwater Sources) and a seventh MCM is optional. The University is considered a Level 2 MS4 and will include the five required MCMs in the SWMP:

1. Public Education, Outreach and Involvement
2. Illicit Discharge Detection and Elimination (IDDE)
3. Construction Site Stormwater Runoff Control
4. Post-construction Stormwater Management in New Development and Redevelopment
5. Pollution Prevention and Good Housekeeping for Municipal Operations

In order to achieve permit requirements, the University has developed and revised a SWMP detailing a series of selected BMPs for each of the five minimum control measures. As outlined throughout the SWMP, each of the BMPs utilizes a series of measurable goals and evaluation techniques to ensure appropriate program implementation throughout the five-year permit period.

2.1.1 List of Allowable Non-Stormwater Discharges

The following non-stormwater sources may be discharged from the small MS4 and are not required to be addressed in the small MS4's Illicit Discharge Detection and Elimination program or other minimum control measures, unless they are determined by the MS4 Operator or the TCEQ to be significant contributors of pollutants to the small MS4 (Part II.C.):

1. Water line flushing (except for hyperchlorinated water unless the water is first dechlorinated);
2. Runoff or return flow from landscape irrigation, lawn irrigation, and

other irrigation utilizing potable water, groundwater, or surface water sources;

3. Discharges from potable water sources that do not violate Texas Surface water quality standards;
4. Diverted stream flows;
5. Rising ground waters and springs;
6. Uncontaminated ground water infiltration;
7. Uncontaminated pumped ground water;
8. Foundation and footing drains;
9. Air conditioning condensation;
10. Water from crawl space pumps;
11. Individual residential vehicle washing;
12. Flows from wetlands and riparian habitats;
13. Dechlorinated swimming pool discharges that do not violate Texas Surface Water Quality Standards;
14. Street wash water excluding street sweeper wash water;
15. Discharges or flows from emergency firefighting activities (firefighting activities do not include washing of trucks, run-off water from training activities, test water from fire suppression systems, and similar activities);
16. Other allowable non-stormwater discharges listed in 40 CFR 122.26(d)(2)(iv)(B)(1);
17. Non-storm water discharges that are specifically listed in the TPDES Multi Sector General Permit (MSGP) or the TPDES Construction General permit (CGP) TXR 150000;
18. Discharges that are authorized by a TPDES or NPDES permit or that are not required to be permitted; and
19. Other similar occasional incidental non-storm water discharges such as spray park water, unless the TCEQ develops permits or regulations addressing these discharges.

2.2 PROCEDURES TO IMPLEMENT THE TEXAS STATE STORMWATER MANAGEMENT PROGRAM

Texas State works with facilities, employees, and contractors to implement the minimum control measures (MCMs) outlined in this SWMP. While some SWMP actions are predictable and consistent from year to year, others are adaptive to the events hosted by other organizations within the university and surrounding community. Students and student organizations, coordinated through Student Involvement @ LBJSC, provide dynamic and ever-changing participants and events in which Texas State can participate to promote relevant stormwater and water quality objectives. Coordination and partnerships with Non-Governmental Organizations (NGOs) and other local entities provide additional opportunities for Texas State to connect with the community and address stormwater issues. The following sections describe the MCMs outlined in this SWMP and required by the MS4 General Permit for non-traditional, Level 2 MS4s. Additional information on specific and measurable goals for each MCM is provided in Sections 3 through 7 of this SWMP.

2.2.1 Public Education, Outreach and Involvement

Texas State is dedicated to educating the campus community about how day-to-day activities can impact stormwater quality and how contaminated runoff can affect stream health. Education topics include, but are not limited to, the hazards associated with illegal discharges, improper disposal of waste, and the steps that can be taken to reduce pollutants in stormwater runoff.

To address pollution prevention through public education and outreach, Texas State developed a Comprehensive Stormwater Education and Outreach Program (E&O Program). This Program facilitates annual planning with facilities, employees and contractors for required training and describes participation in community events. Additionally, it allows flexibility for Texas State to identify and select appropriate involvement opportunities with student organizations and community partners each year.

The E&O Program will be reviewed and updated annually to ensure that the program's message is effectively delivered to the target audiences. Texas State will coordinate education and outreach efforts as appropriate with the City of San Marcos and others to maximize the program and cost effectiveness of the required outreach. The SWMP, annual report, and public education and outreach materials will be accessible on the Texas State website to ensure the public can easily find information about the SWMP. More information on the Public Education, Outreach, and Involvement measures can be found in Section 2.0 of this SWMP.

2.2.2 Illicit Discharge, Detection and Elimination

As a non-traditional MS4, Texas State does not have the authority to develop ordinances or to implement enforcement actions in the same manner as a traditional city. Texas State instead utilizes University Policy and Procedure Statements (UPPS) to communicate university and divisional policies and procedures. The UPPS provides a means for reviewing policies and procedures on an as-needed basis to remain consistent between current practices and applicable regulations and laws.

The UPPS 04.05.16, titled Campus Stormwater Management, was first issued in October 2015 and is subject for review in April 2019. Review of the UPPS will consider the evolving needs of this SWMP and the revised General Permit. Section 03.01 describes Texas State Illicit Discharge prohibition and references the Spill Prevention Control and Countermeasures (SPCC) Plan as well as the Hazardous Materials and Hazardous Waste Management Plan for procedures on responding to and reporting spills. Violations of these UPPS documents are handled in accordance with Section 05 of UPPS 04.05.16.

When an illicit discharge flows from the Texas State MS4 into the City of San Marcos MS4, Texas State will notify the City of San Marcos within 48 hours upon discovery. If an illicit discharge to the Texas State MS4 occurs that the university cannot enforce against, Texas State will notify the TCEQ Region 11 office within 48

hours for assistance at 512-339-2929. Based on Texas State's status as a "non-traditional MS4," these notification requirements are required by the MS4 Permit.

Texas State utilizes a "Hotline" to facilitate public reporting of illicit discharges or water quality impacts associated with discharges into or from the MS4 system. More information on the Illicit Discharge and Elimination Program is provided in Section 3.0 of this SWMP.

2.2.3 Construction Site Stormwater Runoff Control

Texas State has an active construction site stormwater runoff control program to ensure compliance with the Texas Pollutant Discharge Elimination System (TPDES) Construction General Permit (CGP). Both the TCEQ and Texas State are responsible for regulating construction activity with one acre or greater of site disturbance

Texas State is responsible for notifying construction contractors of the requirement to apply for the TPDES CGP. In addition, Texas State will notify contractors if a Water Pollution Abatement Plan (WPAP) is required when work is occurs over the Edwards Aquifer Recharge Zone. Contractors are expected to comply with the TPDES CGP, including performance of inspections documented by written reports and performance of follow-up corrective actions identified during the inspections.

Prior to initiating construction, Texas State conducts a review of construction site plans for compliance with UPPS, including cross-connections to the sanitary sewer, implementation of best management practices (BMPs) for erosion and sediment control, and other compliance criteria. In addition, Texas State conducts a review of the contractor's Stormwater Pollution Prevention Plan (SWPPP). Texas State conducts a preconstruction site visit and completes a checklist that is signed by both owners and operators prior to contractors breaking ground on sites one acre or larger. The MS4 Operator Contact will be notified prior to commencement of construction for all sites on campus, regardless of size.

Periodic audits of construction site compliance is performed by Texas State personnel. An enforcement protocol is defined in UPPS 04.05.16, Section 05. More information on the Construction Site Stormwater Runoff Control measure is provided in Section 4 of this SWMP.

2.2.4 Post-construction Stormwater Management in New Development and Redevelopment

Texas State manages a campus wide post-construction stormwater program. Texas State requires the implementation and maintenance of post-construction BMPS on new development and redevelopment projects (UPPS 04.05.16). Texas State is responsible for maintaining an inventory of the BMPs, along with information regarding the responsible personnel or department on campus. Documentation of maintenance activities on post-construction BMPs on campus is also required and Texas State is responsible for holding the owners or responsible Texas State department accountable for maintaining effective BMPs. A list of recommended BMPs can be found by contacting the EHSRM office.

2.2.5 Pollution Prevention and Good Housekeeping for Municipal Operations

Pollution prevention and good housekeeping programs are employed with the ultimate goal of preventing or reducing pollutant runoff from University activities and University owned areas within the MS4. This includes assessing existing programs and modifying as necessary to continue reducing the discharge of pollutants to the MEP.

SECTION 3 - MCM 1: PUBLIC EDUCATION, OUTREACH AND INVOLVMENT

Public education and outreach are a key component to the success of a SWMP. Through public education, facilities, employees, and contractors, as well as students and their families, may gain an understanding of how their actions affect stormwater quality. Texas State's public education, outreach, and involvement strategy is to promote knowledge about water quality issues in this community. When the community understands that water quality can by impacted by common, everyday activities, major sources of stormwater pollutants can be voluntarily eliminated. Perhaps more importantly, an educated public can be a broad base of support for a SWMP. The objective of this program is to promote a clear identification and understanding of the issues associated with stormwater pollution and to promote community and university ownership.

3.1 REGULATORY REQUIREMENTS

Part III Section B MCM 1: Public Education, Outreach and Involvement

(a) Public Education and Outreach

(1) All permittees shall develop, implement and maintain a comprehensive stormwater education and outreach program to educate public employees, businesses, and the general public of hazards associated with the illegal discharges and improper disposal of waste and about the impact that stormwater discharges can have on local waterways, as well as the steps that the public can take to reduce pollutants in stormwater.

Existing permittees shall assess program elements that were described in the previous permit, modify as necessary, and develop and implement new elements as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP [Maximum Extent Practicable]. New elements must be fully implemented by the end of this permit term and newly regulated permittees shall have the program fully implemented by the end

of this permit term. The program must, at a minimum:

a. *Define the goals and objectives of the program based on high priority community-wide issues (for example, reduction of nitrogen in discharges from the small MS4, promoting previous techniques used in the small MS4, or improving the quality of discharges to the Edwards Aquifer);*
b. *Identify the target audience(s);*
c. *Develop or utilize appropriate educational materials, such as printed materials, billboard and mass transit advertisements, signage at select locations, radio advertisements, television advertisements, and websites;*
d. *Determine cost effective and practical methods and procedures for distribution of materials.*

(2) *Throughout the permit term, all permittees shall make the educational materials available to convey the program's message to the target audience(s) at least annually.*
(3) *If the permittee has a public website, the permittee shall post its SWMP and the annual reports required under Part IV.B.2 or a summary of the annual report on the permittee's website. The SWMP must be posted no later than 30 days after the approval date, and the annual report no later than 30 days after the due date.*
(4) *All permittees shall annually review and update the SWMP and MCM implementation procedures required by Part III.A.2, as necessary. Any changes must be reflected in the annual report. Such written procedures must be maintained, either on site or in the SWMP and made available for inspection by the TCEQ.*
(5) *MS4 operators may partner with other MS4 operators to maximize the program and cost effectiveness of the required outreach.*

(b) Public Involvement

All permittees shall involve the public, and, at minimum, comply with any state and local public notice requirements in the planning and implementation activities related to developing and implementing the SWMP, except that correctional facilities are not required to implement this portion of the MCM.

Existing permittees shall assess program elements that were described in the previous permit, modify as necessary, and develop and implement new elements, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP. New elements must be fully implemented by the end of this permit term and newly regulated permittees shall have the program fully implemented by the end of this permit term. At a minimum, all permittees shall:

(1) Consider using public input (for example, the opportunity for public comment, or public meetings) in the implementation of the program;
(2) Create opportunities for citizens to participate in the implementation of control measures, such as stream clean-ups, storm drain stenciling, volunteer monitoring, volunteer "Adopt-A-Highway" programs and educational activities;
(3) Ensure the public can easily find information about the SWMP.

3.2 SELECTED BEST MANAGEMENT PRACTICES

Texas State has selected the following BMPs to implement over the five-year permit period for this minimum control measure.

3.2.1 Comprehensive Stormwater Education and Outreach Program

BMP Description: A Comprehensive Stormwater Education and Outreach Program was developed by Texas State to include the following items required by the permit:

- Define the goals and objectives of the program based on high priority campus-wide issues.
- Identify the target audiences (students, faculty, staff, contractors, and campus visitors).
- Develop appropriate educational materials.
- Develop cost effective and practical methods of delivering the materials such as new employee or new student orientation packets, newsletters, and social media.
- The methods found to be most cost effective and practical from the previous permit cycle are included in the program as written procedures.

Texas State will continue to implement the programs outlined within the Comprehensive Stormwater Education and Outreach Program, reviewing the program annually and updating the program as necessary to reflect changes on campus and additional outreach opportunities. Resources such as EPA, TCEQ, and other relevant sources (i.e., MS4s, professional organizations, etc.) will be utilized to identify new educational content and/or materials; materials will be customized to serve Texas State.

Measurable Goals	Deadline/Implementation Schedule
1. **Once per year, review 25% of procedures in the Comprehensive Stormwater Education and Outreach Program. Update outdated or incorrect information at least once before the end of Year 5 (2024).**	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Document which section(s) of the Comprehensive Stormwater Education and Outreach Program was/were reviewed annually.
2. Record review date(s), document updates, and summarize changes in the annual report.

Responsible Parties:

- EHSRM

Target Audience: Texas State employees (staff and faculty), students, contractors, and campus visitors.

3.2.2 Education and Outreach for Pollution Prevention

BMP Description: Texas State has developed an education and outreach campaign for encouraging campus-wide pollution prevention for protection of stormwater runoff quality. To support this campaign, Texas State has developed or acquired informational stormwater educational materials for the purpose of educating the campus community on stormwater quality issues. Specific training materials outlined in BMPs herein would be included in the development approach here and stored in the Comprehensive Education & Outreach Program described above in BMP 3.2.1. Education and outreach on pollution prevention activities may include topics such as:

- Basic stormwater awareness and potential impacts to water quality
- Illicit discharge and illegal dumping reporting
- Pollution prevention during recreation activities
- Proper storage and disposal of potential contaminates (e.g. litter, pet waste, vehicle maintenance products, universal wastes, paint and paint-related wastes, household hazardous wastes, yard waste, etc.)

Texas State delivers educational materials through a combination of relevant media, digital platforms, and in-person events as described in BMP 2.2.8. For certain initiatives, Texas State may coordinate education and outreach efforts as appropriate with Non-Governmental Organizations (NGOs) and other entities to maximize the program and cost effectiveness of the public outreach efforts.

Measurable Goals and Activities	Deadline/Implementation Schedule
1. Post a minimum of 12 stormwater educational messages on What Goes Here Flows Here Facebook page or Texas State social media.	August 31 annually (2019 – 2023) (January 23, 2024)
2. Distribute educational and promotional materials at five community events.	August 31 annually (2019 – 2023) (January 23, 2024)
3. Broadcast stormwater message via email to the campus community twice per year.	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Track number of social media messages distributed. Document for annual reporting.
2. Track number of educational and promotional materials distributed at in-person events. Document for annual reporting.
3. Track number of email messages sent out. Document for annual reporting.
4. Maintain an electronic copy of the stormwater educational materials; include with the Comprehensive Education & Outreach Program; and provide examples in the Annual Report.

Responsible Parties:

- EHSRM
- Student Involvement @ LBJSC

Target Audience: Texas State employees (staff and faculty), students, contractors, and campus visitors.

3.2.3 Education/Training for Construction Personnel

BMP Description: Construction at Texas State is performed by contractors on behalf of the university. Contractors are considered *primary operators* under the TPDES General Permit for Construction Site Stormwater Discharges (Construction General Permit or CGP). As the MS4 operator, and in some cases as the *secondary operator with respect to the CGP,* Texas State must ensure that contractors comply with the TPDES CGP when discharging into the Texas State MS4 infrastructure and waters of the state.

Texas State has developed UPPS No. 04.05.16 Campus Stormwater Management to outline contractor expectations for compliance. In support of this Policy, Texas State has developed training materials that

focus on the construction industry and best management practices that are required to meet the CGP compliance obligations. Training materials will be modified in response to changes to the CGP or industry practices. Contractors are required to complete orientation training prior to working on Texas State property. Annual training is also provided to Texas State staff responsible for managing active construction projects and coordinating ~~compliance~~ authorization under ~~with~~ the CGP. Staff will also be encouraged to attend conferences and additional training to increase skills and knowledge of construction inspectors. Training methods and materials are included in the Comprehensive Education & Outreach Program.

Measurable Goals and Activities	Deadline/Implementation Schedule
1. Annually review training materials and update training content at least once before the end of Year 5 (2024).	August 31 annually (2019 – 2023) (January 23, 2024)
2. Once per year, provide training for Texas State construction staff.	August 31 annually (2019 – 2023) (January 23, 2024)
3. Once during each construction project (greater than one acre), provide orientation training to 100% of contractor and subcontractor superintendents on basic SWPPP inspection expectations and site controls.	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Track annual review of training and record review date. Document updates to the training and summarize changes in the annual report.

2. Track number of trainings provided for Texas State construction staff. Track attendance at construction staff training. Document for annual reporting.
3. Track attendance for construction contractors and subcontractor SWPPP training. Document for annual reporting.
4. Maintain an electronic copy of the stormwater educational materials; include with the Comprehensive Education & Outreach Program; and provide examples in the Annual Report.

Responsible Parties:

- EHSRM
- Facilities (Facilities Planning, Design and Construction)

Target Audience: Texas State staff and contractors.

3.2.4 Stormwater Awareness for Campus Community

BMP Description: As part of the Texas State education and outreach campaign for stormwater runoff quality protection, the campus community is provided stormwater awareness messaging. Awareness messages on pollution prevention activities may include topics such as:

- Basic stormwater awareness
- Illicit discharge and illegal dumping reporting
- Pollution prevention during recreation activities
- Proper storage and disposal of potential contaminates (e.g. litter, pet waste, vehicle maintenance products, universal wastes, paint and paint-related wastes, household hazardous wastes, yard waste, etc.)

Awareness messages are designed to educate individuals and encourage them to incorporate simple changes into their daily lives that help prevent pollution and may improve water quality.

Measurable Goals and Activities	Deadline/Implementation Schedule
1. Provide at least 75% of new students with stormwater pollution prevention awareness information.	August 31 annually (2019 – 2023) (January 23, 2024)
2. Provide at least 75% of new employees with stormwater pollution prevention awareness information.	August 31 annually (2019 – 2023) (January 23, 2024)
3. Once per year, provide aquatic pet and pet waste awareness information to on-campus residents.	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Track number of new students that received stormwater pollution prevention awareness information. Document for annual reporting.
2. Track number of new employees that received stormwater pollution prevention awareness information. Document for annual reporting.
3. Track number of times on-campus residents received pet waste awareness information. Document for annual reporting.
4. Maintain an electronic copy of the stormwater educational materials; include with the Comprehensive Education & Outreach Program; and provide examples in the Annual Report.

Responsible Parties:

- EHSRM
- Human Resources
- Student Involvement @ LBJSC

Target Audience: Texas State employees (staff and faculty), students, contractors, and campus visitors.

3.2.5 Web Page and Community Hotlines

BMP Description: Texas State periodically reviews and enhances its stormwater webpage to add content intended to educate the campus on stormwater issues. The information added may include but is not limited to: the renewed Stormwater Management Program, contact information, event schedules for public involvement, educational materials, annual reports, or other pertinent information. This information is regularly maintained and updated for accuracy.

Hotline information is listed on the webpage for the campus community to report illicit discharges, illegal dumping, construction site violations, and additional environmental issues that may affect the water quality.

Measurable Goals and Activities	Deadline/Implementation Schedule
1. Provide public access to the SWMP and annual reports through the stormwater website within 30 days of approval of SWMP and no later than 30 days after annual report due date.	August 31 annually (2019 – 2023) (January 23, 2024)
2. Review and respond to 100% of stormwater concerns and request for information submitted through webpage's contact request page.	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Record dates that SWMP and annual reports were posted online.
2. Track number of stormwater concerns or requests, follow up on requests, and document outcomes for annual reporting.

Responsible Parties:

- EHSRM

Target Audience: Texas State employees (staff and faculty), students, contractors, and campus visitors.

3.2.6 Public Notice Requirements

BMP Description: The University will comply with public notice requirements specified in the permit (Part II E. 16.). Once Texas State receives written notice from the TCEQ Chief Clerk, Texas State will publish notice of the Executive Director's preliminary decision of the NOI and SWMP. The notice will be published in a newspaper of general circulation for Texas State and will allow the public to submit comments on the NOI and SWMP for up to 30 days. The availability of the NOI and SWMP for review will be stated in the notice and will be in a publicly accessible location on campus.

A public meeting may be held following MS4 permit procedures if enough interest is expressed by the public. An affidavit of publication and a copy of the public notice will be filed with the TCEQ Office of the Chief Clerk within 60 days of receiving the initial written instructions.

Measurable Goals and Activities	Deadline/Implementation Schedule
1. Publish the public notice with executive Director's preliminary determination in a newspaper of general circulation within the county within 30 days after being notified by TCEQ Office of Chief Clerk.	August 31 (2021)
2. Submit an affidavit of publication and a copy of the public notice to the TCEQ Office of the Chief Clerk within 60 days of receiving the initial written instructions.	August 31 (2021)

Evaluation:

1. Maintain a copy of the letter from TCEQ and a copy of the Public Notice published in the newspaper. Document date the public notice was published in the newspaper and include in annual report.
2. Maintain a copy of the affidavit of the publication of notice. Document date the notice was submitted to the Office of the Chief Clerk and include in annual report.

Responsible Parties:

- EHSRM

Target Audience: Texas State employees (staff and faculty), students, contractors, and campus visitors.

3.2.7 Stormwater Management Program Advisory Committee

BMP Description: Texas State will include various groups within the University community to create an Advisory Committee that are affected by or have an interest in the implementation of the SWMP. Personnel that may make up the committee may include, but are not limited to:

- Students
- Faculty
- Staff
- Department representatives
- Other Stakeholders

The Committee is tasked with reviewing the SWMP and providing recommendations and feedback on the document and how to best implement the chosen BMPs. The Committee will meet annually to discuss the effectiveness of the program and make suggestions on how to better address stormwater concerns on campus.

Measurable Goals and Activities	Deadline/Implementation Schedule
1. Within one year, create Advisory Committee.	August 31 (2019)
2. Host one meeting per year to discuss SWMP and the implementation of the selected BMPs.	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Document participants of the Advisory Committee, including their affiliation with the University. Document committee establishment date.
2. Document meeting date, attendees, and prepare meeting minutes.

Responsible Parties:

- EHSRM
- All Responsible Departments (identified in Section 1)

Target Audience: Texas State employees (staff and faculty) and students.

3.2.8 Public Involvement and Outreach Events

BMP Description: Numerous events occur throughout the year on campus and within the San Marcos community. Texas State participates in these events, which serve as a method for providing education and outreach to the public. These events may include, but are not limited to:

- Annual Great Texas River Clean Up
- Bobcat Build
- Adopt-a-Spot
- Hot Spot Cleanups
- Storm Drain Marking Program
- Adopt-a-Pond
- Arbor Day
- Earth Day
- Staff Resource Fair
- SMTX Business Expo
- Concerts in the Park
- Movies in Your Park
- Party in Your Park

During annual planning for the Comprehensive Education & Outreach Program, Texas State will review the events planned throughout the year within the MS4 and select a minimum of five (5) events per fiscal year in which to participate. These events will serve to promote education and volunteerism focusing on the effects of common pollutants on the storm

drain system, local creeks and tributaries, and the San Marcos River. Additional consideration will be given to working with volunteer groups on campus to continue to create awareness of stormwater issues.

Measurable Goals and Activities	Deadline/Implementation Schedule
1. Participate in a minimum of five events annually.	August 31 annually (2019 – 2023) (January 23, 2024)
2. Install a minimum of 25 inlet markers and storm drains in new construction or remodeled areas of campus.	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Track the number of events attended. Document participation numbers (attendance, handouts, etc.) for annual reporting.
2. Track the number of inlet markers installed. Document participation numbers (attendance, inlet markers, handouts etc.) for annual reporting.

Responsible Parties:

- EHSRM
- Student Involvement @ LBJSC

Target Audience: Texas State employees (staff and faculty), students, and campus visitors.

3.3 FIVE YEAR PROGRAM SUMMARY

Table 3-1 presents a five-year summary of MCM-1 BMPs and schedule of implementation.

Table 3 - 1 PUBLIC EDUCATION, OUTREACH AND INVOLVEMENT							
Best Management Practice	**Measurable Goals**	**Deadline (August 31, annually)**					**Responsible Departments**
		2019	2020	2021	2022	2023	
Comprehensive Stormwater Education and Outreach Program	Once per year, review 25% of procedures in the Comprehensive Stormwater Education and Outreach Program. Update outdated or incorrect information at least once before the end of Year 5 (2024).	X	X	X	X	X	EHSRM
Education and Outreach for Pollution Prevention	Post a minimum of 12 stormwater educational messages on What Goes Here Flows Here Facebook page or Texas State social media.	X	X	X	X	X	EHSRM Student Involvement @ LBJSC
	Distribute educational and promotional materials at five community events.	X	X	X	X	X	
	Broadcast stormwater message via email to the campus community twice per year.	X	X	X	X	X	
Education/Training for Construction Personnel	Annually review training materials and update training content at least once before the end of Year 5 (2024).	X	X	X	X	X	EHSRM Facilities Planning, Design and Construction
	Once per year, provide training for Texas State construction staff.	X	X	X	X	X	
	Once during each construction project (greater than one acre), provide orientation training to 100% of contractor and subcontractor superintendents on basic SWPPP inspection expectations and site controls.	X	X	X	X	X	

Table 3 - 1 PUBLIC EDUCATION, OUTREACH AND INVOLVEMENT							
Best Management Practice	**Measurable Goals**	**Deadline (August 31, annually)**					**Responsible Departments**
		2019	2020	2021	2022	2023	
Stormwater Awareness for Campus Community	Provide at least 75% of new students with stormwater pollution prevention awareness information.	X	X	X	X	X	EHSRM Human Resources Student Involvement @ LBJSC
	Provide at least 75% of new employees with stormwater pollution prevention awareness information.	X	X	X	X	X	
	Once per year, provide aquatic pet and pet waste awareness information to on-campus residents.	X	X	X	X	X	
Web Page and Community Hotlines	Provide public access to the SWMP and annual reports through the stormwater website within 30 days of approval of SWMP and no later than 30 days after annual report due date.	X	X	X	X	X	EHSRM
	Review and respond to 100% of stormwater concerns and request for information submitted through webpage's contact request page.	X	X	X	X	X	
Public Notice Requirements	Publish the public notice with executive Director's preliminary determination in a newspaper of general circulation within the county within 30 days after being notified by TCEQ Office of Chief Clerk.	N/A	N/A	X			EHSRM
	Submit an affidavit of publication and a copy of the public notice to the TCEQ Office of the Chief Clerk within 60 days of receiving the initial written instructions.	N/A	N/A	X			

Table 3 - 1 PUBLIC EDUCATION, OUTREACH AND INVOLVEMENT							
Best Management Practice	**Measurable Goals**	**Deadline (August 31, annually)**					**Responsible Departments**
		2019	2020	2021	2022	2023	
Stormwater Management Program Advisory Committee	Within one year, create Advisory Committee.	X					EHSRM All Responsible Departments
	Host one meeting per year to discuss SWMP and the implementation of the selected BMPs.		X	X	X	X	
Public Involvement and Outreach Events	Participate in a minimum of five events annually.	X	X	X	X	X	EHSRM Student Involvement @ LBJSC
	Install a minimum of 25 inlet markers and storm drains in new construction or remodeled areas of campus.	X	X	X	X	X	

SECTION 4 - MCM 2: ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE)

An illicit discharge has been defined by the EPA as "any discharge into a separate storm sewer system that is not composed entirely of stormwater." The illicit discharge detection and elimination MCM is intended to detect and eliminate discharges to the MS4 system that are not entirely composed of stormwater. Texas State is considered a Level 2 MS4, therefore, Level 3 and Level 4 requirements do not apply.

4.1 REGULATORY REQUIREMENTS

Part III Section B MCM2: Illicit Discharge Detection and Elimination (IDDE)

(a) Program Development

(1) All permittees shall develop, implement and enforce a program to detect, investigate, and eliminate illicit discharges into the small MS4. The program must include a plan to detect and address non-stormwater discharges, including illegal dumping to the MS4 system.

Existing permittees must assess program elements that were described in the previous permit, modify as necessary, and develop and implement new elements, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP. New elements must be fully implemented by the end of this permit term and newly regulated permittees shall have the program fully implemented by the end of this permit term. See also Part III.A.1(c). The Illicit Discharge Detection and Elimination (IDDE) program must include the following:

a. An up-to-date MS4 map (see Part III.B.2.(c)(1));
b. Methods for informing and training MS4 field staff (see Part III.B.2.(c)(2));
c. Procedures for tracing the source of an illicit discharge (see Part III.B.2.(c)(5));
d. Procedures for removing the source of the illicit discharge (see Part

III.B.2.(c)(5));

e. For Level 2, 3 and 4 small MS4s, if applicable, procedures to prevent and correct any leaking on-site sewage disposal systems that discharge into the small MS4;

(2) For non-traditional small MS4s, if illicit connections or illicit discharges are observed related to another operator's MS4, the permittee shall notify the other MS4 operator within 48 hours of discovery. If notification to the other MS4 operator is not practicable, then the permittee shall notify the appropriate TCEQ regional office of the possible illicit connection.

(3) If another MS4 operator notifies the permittee of an illegal connection or illicit discharge to the small MS4, then the permittee shall follow the requirements specified in Part III.B.2.(c)(3).

(4) All permittees shall annually review and update as necessary, the SWMP and MCM implementation procedures required by Part III.A.2. Any changes must be reflected in the annual report. Such written procedures must be maintained, ether on site or in the SWMP and made available for inspection by the TCEQ.

(b) Allowable Non-Storm Water Discharges

Non-stormwater flows listed in Part II.C do not need to be considered by the permittee as an illicit discharge requiring elimination unless the permittee or the TCEQ identifies the flow as a significant source of pollutants to the small MS4.

(c) Requirements for all Permittees

All permittees shall include the requirements described below in Parts III.B.2.(c)(1)-(6)

(1) MS4 Mapping

All permittees shall maintain an up-to-date MS4 map, which must be located on site and available for review by the TCEQ. The MS4 map must

show at a minimum the following information:

a. *The location of all small MS4 outfalls that are operated by the permittee and that discharge into waters of the U.S;*
b. *The location and name of all surface waters receiving discharges from the small MS4 outfalls;*
c. *Priority areas identified under Part III.B.2.(e)(1) if applicable.*

(2) Education and Training

All permittees shall implement a method for informing or training all the permittee's field staff that may come into contact with or otherwise observe an illicit discharge or illicit connection to the small MS4 as part of their normal job responsibilities. Training program materials and attendance lists must be maintained on site and made available for review by the TCEQ.

(3) Public Reporting of Illicit Discharges and Spills

To the extent feasible, all permittees shall publicize and facilitate public reporting of illicit discharges or water quality impacts associated with discharges into or from the small MS4. The permittee shall provide a central contact point to receive reports; for example by including a phone number for complaints and spill reporting.

(4) All permittees shall develop and maintain on site procedures for responding to illicit discharges and spills.

(5) Source Investigation and Elimination

a. *Minimum Investigation Requirements – Upon becoming aware of an illicit discharge, all permittees shall conduct an investigation to identify and locate the source of such illicit discharge as soon as practicable.*
    (i) *All permittees shall prioritize the investigation of discharges based on their relative risk of pollution. For example, sanitary sewage may be considered a high priority discharge.*
    (ii) *All permittees shall report to the TCEQ immediately upon becoming aware of the occurrence of any illicit flows believed to be an immediate threat to human health or the environment.*
    (iii) *All permittees shall track all investigations and document, at*

a minimum, the date(s) the illicit discharge was observed; the results of the investigation; any follow-up of the investigation; and the date the investigation was closed.

b. *Identification and Investigation of the Source of the Illicit Discharge – All permittees shall investigate and document the source of illicit discharges where the permittees have jurisdiction to complete such an investigation. If the source of illicit discharge extends outside the permittee's boundary, all permittees shall notify the adjacent permitted MS4 operator or the appropriate TCEQ Regional Office according to Part III.A.3.b.*

c. *Corrective Action to Eliminate Illicit Discharge*

If and when the source of the illicit discharge has been determined, all permittees shall immediately notify the responsible party of the problem and shall require the responsible party to perform all necessary corrective actions to eliminate the illicit discharge.

(6) Inspections - The permittee shall conduct inspections, in response to complaints, and shall follow-up inspections to ensure that corrective measures have been implemented by the responsible party.
The permittee shall develop written procedures describing the basis for conducting inspections in response to complaints and conducting follow-up inspections.

4.2 SELECTED BEST MANAGEMENT PRACTICES

Texas State has selected the following BMPs to implement over the five-year permit period for this minimum control measure.

4.2.1 Campus Stormwater Management UPPS 04.05.16

BMP Description: Texas State's Campus Stormwater Management UPPS 04.05.16, Section 03.01 outlines illicit discharge detection and elimination procedures. The UPPS prohibits illicit discharges to the MS4, soil, or waters of the state, in addition to prohibiting illicit connections, all non-stormwater discharges that significantly contribute pollutants to the MS4, and illegal dumping activities. Illegal dumping refers to the intentional placement of chemicals, solid or liquid wastes, tires, trash, or carcasses into a storm drain or MS4 system. Additionally, Section 04 outlines responsibilities for contractors to prevent illicit discharges while working on campus and to report any illicit discharges or illegal dumping activities they discover.

The EHSRM and Facilities Departments will work together to ensure UPPS compliance throughout the campus community. The UPPS includes inspection procedures in response to complaints and monitoring provisions, as well as appropriate enforcement procedures and actions for violators. Compliance with the UPPS will be included in university contracts.

Measurable Goals and Activities	Deadline/Implementation Schedule
1. **Once per year, review 25% of the UPPS for consistency with permit regulations. Update outdated or incorrect information at least once before the end of Year 5 (2024).**	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Document which section(s) of the UPPS was/were reviewed annually.
2. Record review date(s), document updates to the UPPS, and summarize changes in the annual report.
3. Track all violations and enforcement actions relating to illicit discharge non-compliance as described in the UPPS.

Responsible Parties:

- EHSRM
- Facilities
- Finance and Support Services

Target Audience: Texas State employees (staff and faculty), students, contractors, and campus visitors.

4.2.2 Prevention of Illicit Connections between Storm and Sanitary Sewers

Texas State does not have a combined sewer system. However, illicit connections between sanitary sewer and storm sewer systems may occur accidentally during construction. When stormwater inflows to the sanitary sewer, higher than anticipated flow volumes can be transported to the treatment works. When design capacity of the treatment works is exceeded, a bypass of the treatment system may occur, resulting in untreated or undertreated effluent discharge. In addition, untreated wastewater is an illicit discharge if it enters the MS4 by way of illicit connection.

To avoid illicit connections between the sanitary and storm sewer systems, Texas State contracted with Burgess & Niple, Inc. in 2011 to perform smoke testing of the sanitary sewer system on campus ("Texas State Smoke Test Results", July 2011). Facilities staff made necessary repairs to the system as recommended by the report which included

capping an abandoned line, replacing broken manhole covers or frames, and running camera through lines with apparent blockage.

Texas State reviews construction designs and specifications that include storm and sanitary sewer infrastructure to ensure that illicit connections are not proposed. Field verification of constructed assets will confirm that illicit connections do not exist. Illicit connections are prohibited.

Measurable Goals and Activities	Deadline/Implementation Schedule
1. **Review 80% of construction designs and specifications to verify that illicit connections do not exist between storm and sanitary sewers.**	August 31 annually (2019 – 2023) (January 23, 2024)
2. **Field verify 100% of new construction projects to confirm that illicit connections do not exist between storm and sanitary sewers.**	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Record the number of plans reviewed each year for prohibiting illicit connections. Document for annual reporting.
2. Record corrective actions taken to address cross connections and include with the Annual Report.

Responsible Parties:

- EHSRM
- Facilities (Facilities Operations & Facilities Planning, Design and Construction)

Target Audience: Texas State staff and contractors.

4.2.3 Investigate and Prevent Sanitary Sewer Overflows

Sanitary sewer overflows (SSOs) can occur when sewer lines are clogged or when stormwater infiltration causes an overflow of the sewer piping to erupt onto the land surface. SSOs are considered an illicit discharge.

During active construction and before project acceptance, Texas State investigates new sanitary sewer lines for the presence of debris or other issues. Sanitary sewer lines are televised and any issues are noted and communicated to the contractor for repair or removal. For existing sewer lines, Texas State performs case-by-case investigations of potential SSOs in response to complaints, visual observations, or other means. SSOs may result from sewer blockages, grease/grit trap overflows, inflow and infiltration (I and I), or other issues. Texas State may use different methods for investigating SSOs, including televising sewer lines or through the use of dye tests. Texas States assesses the ownership of the line (e.g. city-owned or Texas State-owned) and makes repairs as necessary, which may include unstopping wastewater transmission lines, investigating stoppages on building feeder sewer lines, inspection and maintenance of lift stations, and manhole repairs.

In addition, Texas State assesses the operation and maintenance of grease traps at education and general (E&G) buildings, as well as auxiliary locations (e.g. dining halls, athletic complexes, etc.) on campus. Texas State also conducts monthly inspections of all grease traps, food oil storage units and drum storage areas in accordance with the university's SPCC plan.

Texas State conducts semiannual sampling of wastewater ports as part of the "Industrial Pretreatment Permit" with the City of San Marcos and responds to all noncompliance issues with corrective action.

Measurable Goals and Activities	Deadline/Implementation Schedule
1. Respond to and investigate 100% of Texas State SSOs reported to Facilities that result in an illicit discharge. Document corrective action taken.	August 31 annually (2019 – 2023) (January 23, 2024)
2. Inspect at least 50% of campus grease traps and lift stations annually for maintenance needs and make repairs.	August 31 annually (2019 – 2023) (January 23, 2024)
3. Inspect 25% of grease traps, food oil storage units, and drum storage areas four times per year in conformance with the SPCC Plan.	August 31 annually (2019 – 2023) (January 23, 2024)
4. Sample 100% of select wastewater ports twice per year in accordance with the Industrial Pretreatment Permit.	August 31 annually (2019 – 2023) (January 23, 2024)
5. Once per year, assess maintenance needs of grease traps, grit traps, and oil/water separators. Service units as needed.	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Track SSOs (e.g. from sewer blockages, grease/grit trap overflows, inflow and infiltration, mechanical issues, pipe sizing) that result in an illicit discharge to the storm sewer system.
2. Document number of inspections of grease traps, lift stations, and sanitary sewer manholes. Document repairs or manhole covers replaced.
3. Document number of SPCC and wastewater inspections annually and indicate if any issues were noted during the inspections that could impact runoff quality.

4. Record maintenance activities for grease traps, grit traps, and oil/water separator cleanouts.
5. Summarize illicit discharges from this BMP in the annual report, including corrective actions, violations, and enforcement actions associated with the IDDE policy.

Responsible Parties:

- EHSRM
- Facilities (Facilities Operations & Facilities Management)
- Auxiliary Services
- LBJ Student Center
- Edwards Aquifer Research and Data Center

Target Audience: Texas State staff and contractors.

4.2.4 Storm Sewer Mapping

BMP Description: The existing storm sewer MS4 map will be updated as new outfalls are identified and new storm sewer lines are added or modified. Construction project closeout documents will be reviewed annually to ensure the documents provide GIS compatible as-builts of the storm sewer and sanitary sewer systems. The map includes outfalls to the waters of the state, the names of receiving waters, sources of information used to create and update the map and the storm sewer piping and inlet system. This map will increase the effectiveness and efficiency of responses to illicit discharges entering the storm sewer system.

Measurable Goals and Activities	Deadline/Implementation Schedule
1. **Once per year, add at least 50% of newly constructed storm sewer infrastructure (outfalls, storm drains, piping) to the existing MS4 map. Update outdated or incorrect information at least once before the end of Year 5 (2024).**	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Update the existing MS4 map according to schedule.
2. Make a record of the number of new outfalls added to the MS4 map and GIS database each year and include in the Annual Report.

Responsible Parties:

- EHSRM
- Facilities (Facilities Planning, Design and Construction)

Target Audience: Texas State staff.

4.2.5 Illicit Discharge Detection and Elimination Program

BMP Description: The Illicit Discharge Detection and Elimination (IDDE) Program was developed to include the required components specified in Part III.B.2 of the TPDES General Permit TXR040000 for Phase 2 Level 2 permittees. The 2011 Smoke Test Report and 2013 Stormwater Drainage Study and Plan verified no cross connections exist prior to obtaining permit coverage and implementing the UPPS and IDDE Program.

The IDDE Program utilizes the following procedures or components for illicit discharge identification, response, and elimination:

- Plan review for verifying that illicit connections do not exist between storm and sanitary

- Proactive inspections of existing outfalls
- Complaint-driven investigations and follow-up inspections
- Illicit discharge and spill response
- Regulatory reporting and MS4 notification
- Source investigation and elimination
- Corrective action

Measurable Goals and Activities	Deadline/Implementation Schedule
1. Once per year, review 25% of procedures in the IDDE Program. Update outdated or incorrect information at least once before the end of Year 5 (2024).	August 31 annually (2019 – 2023) (January 23, 2024)
2. Investigate and respond to 100% of reports of spills that may result in an illicit discharge within the MS4.	August 31 annually (2019 – 2023) (January 23, 2024)
3. Conduct visual observations of 20% of MS4 outfalls each year.	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Document which section(s) of the IDDE Program was/were reviewed annually.
2. Record review date(s), document updates, and summarize changes in the annual report.
3. Respond to 100% of reports of illicit discharges or spills. Track the number of spills and whether or not they resulted in an illicit discharge to the MS4.
4. Document the number of MS4 outfalls inspected annually.

Responsible Parties:

- EHSRM

- Facilities (Facilities Operations)

Target Audience: Texas State staff and contractors.

4.2.6 Training on Illicit Discharge Detection, Reporting, and Response

BMP Description: Training is provided to staff in applicable departments to increase awareness on identifying illicit discharges and how to report them. Training is also provided to staff who are responsible for documenting illicit discharge reports through the hotline number, responding to spills and illicit discharges, conducting complaint-based inspections, and conducting outfall inspections.

Measurable Goals and Activities	Deadline/Implementation Schedule
1. Provide training to 75% of applicable staff each year on illicit discharge detection and reporting. Update training content at least once before the end of Year 5 (2024).	August 31 annually (2019 – 2023) (January 23, 2024)
2. Provide technical training for 100% of applicable staff each year tasked with spill and illicit discharge response, inspections, and outfall monitoring.	August 31 annually (2019 – 2023) (January 23, 2024)
3. Provide training at least once before the end of Year 5 (2024) for 100% of staff responsible for operating the IDDE hotline.	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Track number of staff trained annually on IDDE reporting. Document for annual reporting.

2. Review and update training at least once during the Permit Term.
3. Track number of staff trained on spill response, inspections, and outfall monitoring. Document for annual reporting.
4. Track number of staff trained on operating IDDE hotline. Document for annual reporting.

Responsible Parties:

- EHSRM
- All Responsible Departments (identified in Section 1)

Target Audience: Texas State staff.

4.2.7 IDDE Hotline Number and Follow-up Procedures

BMP Description: A hotline number has been established for the public to call and report illicit discharges or illegal dumping and to receive information concerning corrective actions taken. The number is posted to the University website and other forms of educational and outreach materials.

The IDDE Program (see 4.2.5) describes procedures for responding to reports of illicit discharges, investigating potential sources, eliminating or isolating the source, performing follow-up inspections, documentation, and regulatory reporting (if applicable).

Measurable Goals and Activities	Deadline/Implementation Schedule
1. **Maintain the existing hotline number for the public to report illicit discharge or illegal dumping. Advertise hotline number four times per year in a university newsletter.**	August 31 annually (2019 – 2023) (January 23, 2024)
2. **Review and respond to 100% of illicit discharges reported through the hotline number.**	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Document IDDE hotline advertisement in newsletter four times per year.
2. Document number of illicit discharge reports received, investigation findings, and corrective action taken.
3. Report the findings on the annual report.

Responsible Parties:

- EHSRM
- Facilities (Facilities Operations & Utilities Operations)

Target Audience: Texas State employees (staff and faculty), students, contractors, and campus visitors.

4.2.8 Hazardous Waste and Recycle Material Collection Programs

BMP Description: Texas State is registered as a large quantity generator of hazardous waste with the TCEQ and EPA. The University collects and stores hazardous waste from areas owned and operated by the University. To comply with registration, hazardous waste is stored on campus for no more than 90 days, then disposed of at a permitted Treatment, Storage, and Disposal Facility (TSDF). Texas State also provides pickup and recycling services for single-stream recycling (glass, aluminum, paper, and cardboard) as well as for universal waste (mercury-containing lamps and paint waste), lead acid batteries, and ink jet cartridges. These services are available to students, staff, and faculty to prevent improper or less-than-idea waste disposal (sanitary sewer, storm sewer, or landfill).

Measurable Goals and Activities	Deadline/Implementation Schedule
1. Conduct at least 40 campus pickups of hazardous waste and universal waste each year. Dispose of hazardous waste and record volumes.	August 31 annually (2019 – 2023) (January 23, 2024)
2. Conduct at least 6 campus pickups of lead acid batteries and ink jet cartridges each year. Recycle batteries/cartridges and record volumes.	August 31 annually (2019 – 2023) (January 23, 2024)
3. Conduct at least 40 campus pickups of single-stream recycling of aluminum, plastic, glass, paper, and cardboard each year.	August 31 annually (2019 – 2023) (January 23, 2024)
4. Document volume of wastes disposed or recycled annually.	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Record volumes of each waste picked up annually, document on annual report.

Responsible Parties:

- EHSRM
- Facilities (Grounds and Waste Management)

Target Audience: Texas State employees (staff and faculty), students, and contractors.

4.3 Five Year Program Summary

Table 4-1 presents a five-year summary of MCM-2 BMPs and schedule of implementation.

Table 4 – 1 ILLICIT DISCHARGE DETECTION AND ELIMINATION							
Best Management Practice	**Measurable Goals**	**Deadline (August 31, annually)**					**Responsible Departments**
		2019	2020	2021	2022	2023	
Campus Stormwater Management UPPS 04.05.16	Once per year, review 25% of the UPPS for consistency with permit regulations. Update outdated or incorrect information at least once before the end of Year 5 (2024).	X	X	X	X	X	EHSRM Facilities Finance and Support Services
Prevention of Illicit Connections between Storm and Sanitary Sewers	Review 80% of construction designs and specifications to verify that illicit connections do not exist between storm and sanitary sewers.	X	X	X	X	X	EHSRM Facilities Operations Facilities Planning, Design and Construction
	Field verify 100% of new construction projects to confirm that illicit connections do not exist between storm and sanitary sewers.	X	X	X	X	X	
Investigate and Prevent Sanitary Sewer Overflows	Respond to and investigate 100% of Texas State SSOs reported to Facilities that result in an illicit discharge. Document corrective action taken.	X	X	X	X	X	EHSRM Facilities Management Facilities Operations Auxiliary Services LBJ Student Center Edwards Aquifer Research and Data Center
	Inspect at least 50% of campus grease traps and lift stations annually for maintenance needs and make repairs.	X	X	X	X	X	
	Inspect 25% of grease traps, food oil storage units, and drum storage areas four times per year in conformance with the SPCC Plan.	X	X	X	X	X	
	Sample 100% of select wastewater ports twice per year in accordance with the Industrial Pretreatment Permit.	X	X	X	X	X	
	Once per year, assess maintenance needs of grease traps, grit traps, and oil/water separators. Service units as needed.	X	X	X	X	X	

Table 4 – 1 ILLICIT DISCHARGE DETECTION AND ELIMINATION							
Best Management Practice	**Measurable Goals**	**Deadline (August 31, annually)**					**Responsible Departments**
		2019	2020	2021	2022	2023	
Storm Sewer Mapping	Once per year, add at least 50% of newly constructed storm sewer infrastructure (outfalls, storm drains, piping) to the existing MS4 map. Update outdated or incorrect information at least once before the end of Year 5 (2024).	X	X	X	X	X	EHSRM Facilities Planning, Design and Construction
Illicit Discharge Detection and Elimination Program	Once per year, review 25% of procedures in the IDDE Program. Update outdated or incorrect information at least once before the end of Year 5 (2024).	X	X	X	X	X	EHSRM Facilities Operations
	Investigate and respond to 100% of reports of spills that may result in an illicit discharge within the MS4.	X	X	X	X	X	
	Conduct visual observations of 20% of MS4 outfalls annually.	X	X	X	X	X	
Training on Illicit Discharge Detection, Reporting, and Response	Provide training to 75% of applicable staff each year on illicit discharge detection and reporting. Update training content at least once before the end of Year 5 (2024).	X	X	X	X	X	EHSRM All Responsible Departments
	Provide technical training for 100% of applicable staff each year tasked with spill and illicit discharge response, inspections, and outfall monitoring.	X	X	X	X	X	
	Provide training at least once before the end of Year 5 (2024) for 100% of staff responsible for operating the IDDE hotline.	X	X	X	X	X	

Table 4 – 1 ILLICIT DISCHARGE DETECTION AND ELIMINATION							
Best Management Practice	**Measurable Goals**	**Deadline (August 31, annually)**					**Responsible Departments**
		2019	2020	2021	2022	2023	
IDDE Hotline Number and Follow-up Procedures	Maintain the existing hotline number for the public to report illicit discharge or illegal dumping. Advertise hotline number four times per year in a university newsletter.	X	X	X	X	X	EHSRM Facilities Operations Utilities Operations
	Review and respond to 100% of illicit discharges reported through the hotline number.	X	X	X	X	X	
Hazardous Waste and Recycle Material Collection Programs	Conduct at least 40 campus pickups of hazardous waste and universal waste each year. Dispose of hazardous waste and record volumes.	X	X	X	X	X	EHSRM Grounds and Waste Management
	Conduct at least 6 campus pickups of lead acid batteries and ink jet cartridges each year. Recycle batteries/cartridges and record volumes.	X	X	X	X	X	
	Conduct at least 40 campus pickups of single-stream recycling of aluminum, plastic, glass, paper, and cardboard each year.	X	X	X	X	X	
	Document volume of wastes disposed or recycled annually.	X	X	X	X	X	

SECTION 5 - MCM 3: CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

Construction site stormwater runoff control measures are designed to prevent soil and construction debris from entering the MS4 system from construction sites. During construction activities, vegetation and topsoil are stripped away, making the area especially vulnerable to erosion. This MCM consists of BMPs that focus on ensuring contractors and Texas State reduce pollutants in stormwater from construction sites that are one acre or larger in size.

5.1 REGULATORY REQUIREMENTS

Part III Section B MCM 3: Construction Site Stormwater Runoff Control

(a) Requirements and Control Measures

(1) All permittees shall develop, implement and enforce a program requiring operators of small and large construction activities, as defined in Part I of this general permit, to select, install, implement and maintain stormwater control measures that prevent illicit discharges to the maximum extent practicable (MEP). The program must include the development and implementation of an ordinance or other regulatory mechanism, as well as sanctions to ensure compliance to the extent allowable under state, federal and local law, to require erosion and sediment control.

Existing permittees shall assess program elements that were described in the previous permit, modify as necessary, and develop and implement new elements, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP. New elements must be fully implemented by the end of this permit term and newly regulated permittees shall have the program fully implemented by the end of this permit term.

If TCEQ waives requirements for stormwater discharges associated with small construction from a specific site(s), the permittee is not required to enforce the program to reduce pollutant discharges from such site(s).

(b) Requirements for all Permittees

All permittees shall include the requirements described below in Parts III.B.3(b)(1)-(7)

(1) All permittees shall review and update as necessary, the SWMP and MCM implementation procedures required by Part IIIA.2. Any changes must be included in the annual report. Such written procedures must be maintained on site or in the SWMP and made available for inspection by the TCEQ.

(2) All permittees shall require that construction site operators implement appropriate erosion and sediment control BMPs. The permittee's construction program must ensure the following minimum requirements are effectively implemented for all small and large construction activities discharging to its small MS4.

a. Erosion and Sediment Controls – Design, install and maintain effective erosion controls and sediment controls to minimize the discharge of pollutants.

b. Soil Stabilization – Stabilization of disturbed areas must, at a minimum, be initiated immediately whenever any clearing, grading, excavating or other earth disturbing activities have permanently ceased on any portion of the site, or temporarily ceased on any portion of the site and will not resume for a period exceeding 14 calendar days. Stabilization must be completed as soon as practicable, but no more than 14 calendar days after the initiation of soil stabilization measures. In arid, semiarid and drought-stricken areas, where initiating vegetative stabilization measures immediately is infeasible, alternative stabilization measures must be employed. The permittee shall develop written procedures that describes initiating and completing stabilization measures for construction sites.

c. BMPs – Design, install, implement and maintain effective BMPs to minimize the discharge of pollutants to the small MS4. At a minimum, such BMPs must be designed, installed, implemented and

maintained to:

(i) Minimize the discharge of pollutants from equipment and vehicle washing, wheel wash water and other wash waters;

(ii) Minimize the exposure of building materials, building products, construction wastes, trash, landscape materials, fertilizers, pesticides, herbicides, detergents, sanitary waste and other materials present on the site to precipitation and to stormwater; and

(iii) Minimize the discharge of pollutants from spills and leaks.

d. As an alternative to (a) through (c) above, all permittees shall ensure that all small and large construction activities discharging to the small MS4 have developed and implemented a stormwater pollution prevention plan (SWP3) in accordance with the TPDES CGP TXR150000. In arid, semiarid and drought-stricken areas where initiating vegetative stabilization measures immediately is infeasible, alternative stabilization measures must be employed as described in the written procedures required in item (2)b. As an alternative, vegetative stabilization measures may be implemented as soon as practicable.

(3) Prohibited Discharges – The following discharges are prohibited:

a. Wastewater from washout of concrete and wastewater from water well drilling operations, unless managed by an appropriate control;
b. Wastewater from washout and cleanout of stucco, paint, form release oils, and other construction materials;
c. Fuels, oils or other pollutants used in vehicle and equipment operation and maintenance; and
d. Soaps or solvents used in vehicle and equipment washing;
e. Discharges from dewatering activities, including discharges from dewatering of trenches and excavations, unless managed by appropriate BMPs.

(4) Construction Plan Review Procedures

To the extent allowable by state, federal and local law, all permittees shall maintain and implement site plan review procedures that describe which plans will be reviewed as well as when an operator may begin construction. For those permittees without legal authority to enforce site plan reviews, this requirement is limited to those sites operated by the permittee and its contractors and located within the permittee's regulated area. The site plan procedures must meet the following minimum requirements:

a. The site plan review procedures must incorporate consideration of potential water quality impacts.
b. The permittee may not approve any plans unless the plans contain appropriate site-specific construction site control measures that, at a minimum, meet the requirements described in Part III.B.3.(a) or the TPDES CGP, TXR150000.

The permittee may require and accept a plan, such as a SWP3, that has been developed pursuant to the CGP, TXR150000.

(5) Construction Site Inspections and Enforcement

To the extent allowable by state, federal and local law, all permittees shall implement procedures for inspecting large and small construction projects. Permittees without legal authority to inspect construction sites shall, at a minimum, conduct inspections of sites operated by the permittee or its contractors and that are located in the permittee's regulated area.

a. The permittee shall conduct inspections based on the evaluation of factors that are a threat to water quality, such as: soil erosion potential; site slope; project size and type; sensitivity of receiving water bodies; proximity to receiving water bodies; non-stormwater discharges; and past record of non-compliance by the operators of the construction site.

b. Inspections must occur during the active construction phase.

(i) All permittees shall develop and implement updated written procedures outlining the inspection and enforcement requirements. These procedures must be maintained on site or in the SWMP and be made available to TCEQ.

(ii) Inspections of construction sites must, at a minimum:

1. *Determine whether the site has appropriate coverage under the TPDES CGP, TXR150000. If no coverage exists, notify the permittee of the need for permit coverage.*
2. *Conduct a site inspection to determine if control measures have been selected, installed, implemented and maintained according to the small MS4's requirements.*
3. *Assess compliance with the permittee's ordinances and other regulations.*
4. *Provide a written or electronic inspection report.*

c. Based on site inspection finding, all permittees shall take all necessary follow-up actions (for example, follow-up inspections or enforcement) to ensure compliance with permit requirements and the SWMP. These follow-up and enforcement actions must be tracked and maintained for review by the TCEQ.

For non-traditional small MS4s with no enforcement powers, the permittee shall notify the adjacent MS4 operator with enforcement authority or the appropriate TCEQ Regional Office according to Part III.A.3(b).

(6) Information submitted by the Public

All permittees shall develop, implement and maintain procedures for receipt and consideration of information submitted by the public.

(7) MS4 Staff Training

All permittees shall ensure that all staff whose primary job duties are related to implementing the construction stormwater program (including permitting, plan review, construction site inspections and enforcement) are informed or trained to conduct these activities. The training may be conducted by the permittee or by outside trainers.

5.2 SELECTED BEST MANAGEMENT PRACTICES

5.2.1 Campus Stormwater Management UPPS 04.05.16

BMP Description: Texas State's Campus Stormwater Management UPPS 04.05.16 Section 03.02 outlines expectations for general contractors for compliance with TPDES CGP TXR150000, including:

- Preparation of a SWPPP
- Documentation of SWPPP inspections
- BMP maintenance for erosion/sediment control and other pollution prevention activities
- Preventing unauthorized discharges from the site

The UPPS also describes requirements for SWPPP development that contractors must follow, including incorporating elements from the TPDES CGP, Texas State Construction Standards, Texas State UPPS, and associated internal reference documents. Additionally, the UPPS addresses the University's inspection process and enforcement requirements. The UPPS codifies Texas State's commitment to hold contractors accountable for construction stormwater compliance while working within the Texas State MS4.

Measurable Goals	Deadline/Implementation Schedule
1. **Once per year, review 25% of the UPPS for consistency with permit regulations. Update outdated or incorrect information at least once before the end of Year 5 (2024).**	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Document which section(s) of the UPPS was/were reviewed annually.
2. Record review date(s), document updates to the UPPS, and summarize changes in the annual report.
3. Track all violations and enforcement actions relating to construction

site non-compliance as described in the UPPS.

Responsible Parties:

- EHSRM
- Facilities
- Finance and Support Services

Target Audience: Texas State employees (staff and faculty), students, contractors, and campus visitors.

5.2.2 MS4 Compliance Plan for Construction Activities

BMP Description: Texas State will continue to monitor compliance with construction stormwater activities on sites greater than or equal to one (≥ 1) acre in size through the continuation of the MS4 Compliance Plan for Construction Activities developed during the first permit term. Texas State Construction Standards, Texas State SWMP, TPDES CGP, and UPPS 04.05.16 are the guiding documents for this plan. The MS4 Compliance Plan will be reviewed annually and updated as necessary. Plan components are as follows:

- Plan review of design drawings, specifications, and sediment & erosion control plans for new construction and redevelopment
- Plan review of SWPPP, site maps, and sediment & erosion control plans
- Post-construction BMP review and selection
- Project start-up procedures
- Expectations for contractors (including a list of prohibited discharges)
- MS4 Compliance Inspection procedures

Texas State will review and update existing checklists for SWPPP review and plan review of design drawings and specifications. SWPPP review checklists will include administrative requirements in the TPDES CGP and items required on associated SWPPP drawings. Both checklists may include additional MS4 permit requirements such as:

- Potential water quality impacts
- Proper use and placement of erosion controls
- Proper selection and sizing of post-construction BMPs
- Incorporation of low impact development methods, as appropriate
- Additional requirements for discharges to another MS4 or to the Edwards Aquifer

Measurable Goals	Deadline/Implementation Schedule
1. Within one year, revise existing checklists to follow for plan review.	August 31 (2019)
2. Review 75% of drawings/specifications/ sediment & erosion control plans, SWPPP plans and drawings, and post-construction BMP selection on new construction and redevelopment.	August 31 annually (2019 – 2023) (January 23, 2024)
3. Once per year, review 25% of procedures in the of the MS4 Compliance Plan. Update outdated or incorrect information at least once before the end of Year 5 (2024). Incorporate changes into Texas State Construction Standards supporting documentation.	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Document revisions to internal plan review checklists in Year 1 and make available for review if requested.
2. Track the number of construction plan reviews conducted annually. Record information in the annual report.
3. Document which section(s) of the MS4 Compliance Plan was/were reviewed annually.
4. Record review date(s), document updates, and summarize changes in the annual report.

Responsible Parties:

- EHSRM
- Facilities (Facilities Planning, Design and Construction)

Target Audience: Texas State staff and contractors.

5.2.3 MS4 Compliance Inspections

BMP Description: In accordance with UPPS 04.05.16, Texas State will continue to ensure that construction sites on University property greater than or equal to one (≥ 1) acre in size are inspected in accordance with TPDES CGP requirements. MS4 Compliance Inspections are performed at a frequency determined by the permittee (based on site performance, complaints submitted by the public, or other risk factors) and will address the following components:

- Coverage under TPDES CGP TXR150000
- Compliance with UPPS 04.05.16
- Documentation review (e.g. SWPPP inspection reports, updated site map, etc.)
- Site inspection to review selected BMP installation, maintenance, and other appropriate pollution prevention practices.

MS4 Compliance Inspection reports will be provided to the University project manager and general contractor. Non-compliance will be addressed on a case-by-case basis. UPPS 04.05.16 outlines follow-up inspections, escalation procedures, and enforcement actions to address non-compliance issues.

Measurable Goals	Deadline/Implementation Schedule
1. Conduct at least two MS4 Compliance Inspections during active construction on sites regulated under the TXR150000; document inspection findings.	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Record the number of inspections conducted each year.
2. Document the number of non-compliance issues recorded annually. Track all violations and enforcement actions relating to construction site non-compliance as described in the UPPS.

Responsible Parties:

- EHSRM
- Facilities (Facilities Planning, Design and Construction)

Target Audience: Texas State staff and contractors.

5.2.4 Education/Training for Construction Personnel

BMP Description: See Section 3.2.3

5.2.5 Stormwater Hotline for Construction Runoff Issues

BMP Description: See Section 3.2.5

5.3 Five Year Program Summary

Table 5-1 presents a five-year summary of MCM-4 BMPs and schedule of implementation.

Table 5 - 1 CONSTRUCTION SITE STORMWATER RUNOFF CONTROL							
Best Management Practice	**Measurable Goals**	**Deadline (August 31, annually)**					**Responsible Departments**
		2019	2020	2021	2022	2023	
Campus Stormwater Management UPPS 04.05.16	Once per year, review 25% of the UPPS for consistency with permit regulations. Update outdated or incorrect information at least once before the end of Year 5 (2024).	X	X	X	X	X	EHSRM Facilities Finance and Support Services
MS4 Compliance Plan for Construction Activities	Within one year, revise existing checklists to follow for plan review.	X					EHSRM Facilities Planning, Design and Construction
	Review 75% of drawings/specifications/ sediment & erosion control plans, SWPPP plans and drawings, and post-construction BMP selection on new construction and redevelopment.	X	X	X	X	X	
	Once per year, review 25% of procedures in the of the MS4 Compliance Plan. Update outdated or incorrect information at least once before the end of Year 5 (2024). Incorporate changes into Texas State Construction Standards supporting documentation.	X	X	X	X	X	
MS4 Compliance Inspections	Conduct at least two MS4 Compliance Inspections during active construction on sites regulated under the TXR150000; document inspection findings.	X	X	X	X	X	EHSRM Facilities Planning, Design and Construction
Education/Training for Construction Personnel	See Table 3 - 1 Public Education, Outreach and Involvement						
Stormwater Hotline for Construction Runoff Issues	See Table 3 - 1 Public Education, Outreach and Involvement						

SECTION 6 - MCM 4: POST-CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

Post-construction stormwater management in new development and redevelopment focuses on the implementation of controls to maintain good water quality conditions after an area has been developed. New development can also have a significant effect on water quality because during the course of development, natural landscapes are often replaced by impermeable roads, parking lots, sidewalks and other paved surfaces that lead to increases in both the volume of stormwater runoff and the accompanying pollutants that reach local water bodies.

The MS4s are required to develop, implement, and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale that discharge to the small MS4. The program must ensure that controls are in place to prevent or minimize water quality impacts.

6.1 REGULATORY REQUIREMENTS

Part III Section B MCM 4: Post Construction Stormwater Management in New Development and Redevelopment

(a) Post-Construction Stormwater Management Program

(1) All permittees shall develop, implement, and enforce a program to the extent allowable under state, federal and local law to control stormwater discharges from new development and redevelopment sites that discharge into the small MS4 that disturb one acre or more, including projects that disturb less than one acre that are part of a larger common plan of development or sale. The program must be established for private and public development sites. The program may utilize an offsite mitigation and payment in lieu of components to address this requirement.

Existing permittees shall assess program elements that were described in the previous permit, modify as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP. New elements must be fully implemented by the end of this permit term and newly regulated permittees shall have the program fully implemented by the end of the permit term.

(2) All permittees shall use, to the extent allowable under state, federal and local law and local development standards, an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects. The permittees shall establish, implement and enforce a requirement, that owners or operators of new development and redevelopment sites design, install, implement and maintain a combination of structural and non-structural BMPs appropriate for the community and that protects water quality. If the construction of permanent structures is not feasible due to space limitations, health and safety concerns, cost effectiveness, or highway construction codes, the permittee may propose an alternative approach to TCEQ. Newly regulated permittees shall have the program elements fully implemented by the end of the permit term.

(b) Requirement for All Permittees

All permittees shall include the requirements described below in Parts III.B.4(b)(1)-(3)

(1) All permittees shall annually review and update as necessary, the SWMP and MCM implementation procedures required by Part III.A.2. Any changes must be included in the annual report. Such written procedures must be maintained either on site or in the SWMP and made available for inspection by the TCEQ.

(2) All permittees shall document and maintain records of enforcement actions and make them available for review by the TCEQ.

(3) Long-Term Maintenance of Post-Construction Stormwater Control Measures

All permittees shall, to the extent allowable under state, federal, and local law, ensure the long-term operation and maintenance or structural stormwater control measured installed through one or both of the following approaches:

a. Maintenance performed by the permittee. See Part III.B.5

b. Maintenance performed by the owner or operator of a new development or redevelopment site under a maintenance plan. The maintenance plan must be filed in the real property records of the county in which the property is located. The permittee shall require the owner or operator of any new development or redevelopment site to develop and implement a maintenance plan addressing maintenance requirements for any structural control measures installed on site. The permittee shall require operation and maintenance performed is documented and retained on site, such as at the offices of the owner or operator, and made available for review by the small MS4.

6.2 SELECTED BEST MANAGEMENT PRACTICES

6.2.1 Campus Stormwater Management UPPS 04.05.16

BMP Description: Texas State's Campus Stormwater Management UPPS 04.05.16 Section 03.03 outlines requirements for post-construction stormwater management using structural and non-structural BMPs.

The UPPS includes elements such as post-construction BMP selection criteria, maintenance requirements, and acceptance procedures. Additionally, the UPPS addresses the University's inspection process and enforcement requirements. Non-compliance will be addressed on a case-by-case basis. UPPS 04.05.16 will outline follow-up inspections, escalation procedures, and enforcement actions to address non-compliance issues.

Measurable Goals and Activities	Deadline/Implementation Schedule
1. **Once per year, review 25% of the UPPS for consistency with permit regulations. Update outdated or incorrect information at least once before the end of Year 5 (2024).**	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Document which section(s) of the UPPS was/were reviewed annually.
2. Record review date(s), document updates to the UPPS, and summarize changes in the annual report.
3. Track all violations and enforcement actions relating to post-construction BMP non-compliance as described in the UPPS.

Responsible Parties:

- EHSRM
- Facilities

- Finance and Support Services

Target Audience: Texas State employees (staff and faculty), students, contractors, and campus visitors.

6.2.2 Post-Construction Stormwater Management Program

BMP Description: The University will update and enforce the existing Post-Construction Stormwater Management Program that describes methods for controlling stormwater discharges from new development and redeveloped sites that discharge into the MS4 that disturb one acre or more. This program utilizes BMPs that range from non-structural controls (e.g. good housekeeping practices) to structural controls as a means of controlling stormwater and reducing the discharge of pollutants to the MS4 to the maximum extent practicable. The Post-Construction Management Program describes BMP ownership, suggested maintenance, suggested inspection frequencies, and other information departments can use for post-construction BMP management and maintenance.

Measurable Goals	Deadline/Implementation Schedule
1. **Once per year, review 25% of procedures in the Post-Construction Stormwater Management Program each year. Update outdated or incorrect information at least once before the end of Year 5 (2024).**	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Document which section(s) of the Post-Construction Stormwater Management Program was/were reviewed annually.
2. Record review date(s), document updates, and summarize changes in the annual report.

Responsible Parties:

- EHSRM
- Facilities (Grounds and Waste Management & Utilities Operations)
- Auxiliary Services
- Transportation Services

Target Audience: Texas State staff.

6.2.3 Inventory of Structural BMPs

BMP Description: The University continuously updates the inventory of structural BMPs on campus. The information is presented in a map and table format. Both the map and the table will be updated as new structural BMPs are added.

Measurable Goals	Deadline/Implementation Schedule
1. **Once per year, add at least 50% of newly constructed structural BMPs to the existing inventory table and map. Update outdated or incorrect information at least once before the end of Year 5 (2024).**	August 31 annually (2019 – 2023) (January 23, 2024)
2. **Once per year, review list of owners/operators (responsible departments) for BMP maintenance. Update outdated or incorrect information at least once before the end of Year 5 (2024).**	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Update map and table of structural BMPs annually. Document information in the annual report.
2. Maintain list of owners/operators (departments) responsible for BMP maintenance.

Responsible Parties:

- EHSRM
- Facilities (Facilities Planning, Design and Construction)

Target Audience: Texas State staff.

6.2.4 Post-Construction BMP Design Review

BMP Description: The University enforces a program that controls post-construction stormwater discharges from new development and redeveloped sites one acre or larger that discharge into the MS4. This program utilizes BMPs that range from good housekeeping to structural controls as a means of controlling stormwater after construction has ended. Determination for structural BMP implementation and selection on new development and redevelopment projects will be based on the following criteria:

- Location and size of proposed construction site
- Proximity to receiving waters
- Impermeable surface coverage
- Sustainability and practicality of BMP

Design drawings and specifications for selected post-construction BMPs will be reviewed based on the following criteria:

- Appropriate placement of structural BMP
- Potential pollutants of concern
- BMP purpose or functionality
- Industry standard vs. proposed design
- Maintenance requirements

Measurable Goals	Deadline/Implementation Schedule
1. **Within one year, revise existing checklists to follow for plan review.**	August 31 (2019)
2. **Review 75% of drawings/specifications/ sediment & erosion control plans, SWPPP plans and drawings, and post-construction BMP selection on new construction and redevelopment.**	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Document revisions to internal plan review checklists in Year 1 and make available for review if requested.
2. Track the number of construction plan reviews conducted annually. Record information in the annual report.

Responsible Parties:

- EHSRM
- Facilities (Facilities Planning, Design and Construction & Utilities Operations)

Target Audience: Texas State staff.

6.2.5 Inspection Program for Structural BMPs

BMP Description: The effectiveness of post-construction structural BMPs is dependent upon the regular inspection and maintenance of the BMPs. Inspection of structural controls or BMPs helps to identify maintenance or repair needs. The University will review and update BMP inspection checklists and will ensure inspections are conducted as necessary by the owner/ operator (responsible department). Inspection checklists will include references to operation and maintenance of the BMP as well as any special

instructions for the inspectors.

Measurable Goals	Deadline/Implementation Schedule
1. **Once per year, review structural BMP inspection forms and update as necessary. Update forms at least once before the end of Year 5 (2024).**	August 31 annually (2019 – 2023) (January 23, 2024)
2. **Once per year, review BMP fact sheets. Update fact sheets at least once before the end of Year 5 (2024).**	August 31 annually (2019 – 2023) (January 23, 2024)
3. **Once before the end of Year 5, use fact sheets to train BMP inspectors on inspection protocols.**	August 31 annually (2019 – 2023) (January 23, 2024)
4. **Inspect 50% of structural BMPs once per year to assess functionality and maintenance needs.**	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Review internal BMP inspection forms and make available for review if requested. Update forms at least once before the end of Year 5.
2. Review internal BMP fact sheets and make available for review if requested. Update forms at least once before the end of Year 5.
3. Track number of staff trained on conducting BMP inspections. Document for annual reporting.
4. Track the number of structural BMP compliance inspections conducted each year. Document number in annual report.

Responsible Parties:

- EHSRM
- Facilities (Grounds and Waste Management & Utilities Operations)
- Auxiliary Services
- Transportation Services

Target Audience: Texas State staff.

6.2.6 Operation and Maintenance of Structural BMPs

BMP Description: The University requires that operation and maintenance (O&M) plans for structural BMPs be submitted by contractors prior to site acceptance. The plans will be reviewed pursuant to Section 6.2.4 of the SWMP and the operation and maintenance of the BMPs will be performed by the owner/operator (responsible department) as is detailed in UPPS 04.05.16. The UPPS also includes an enforcement and escalation process if maintenance is not performed in a timely manner. If operation and maintenance plans are not provided upon project acceptance, industry standard for maintenance will be adopted.

Measurable Goals	Deadline/Implementation Schedule
1. Upon completion of a construction project, obtain 100% of O&M plans (or use industry standard) for new structural BMPs.	August 31 annually (2019 – 2023) (January 23, 2024)
2. Once per year, collaborate with responsible departments to assess structural BMP O&M needs based on O&M recommendations, inspection results, or both.	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Document structural BMP O&M information. Retain information on the share drive for future use.
2. Document BMP maintenance, including the volume and disposition of materials removed.

Responsible Parties:

- EHSRM
- Facilities (Grounds and Waste Management & Utilities Operations)
- Auxiliary Services
- Transportation Services

Target Audience: Texas State staff.

6.3 Five Year Program Summary

Table 6-1 presents a five-year summary of MCM-4 BMPs and a schedule of implementation.

Table 6 - 1 POST-CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT							
Best Management Practice	**Measurable Goals**	**Deadline (August 31, annually)**					**Responsible Departments**
		2019	2020	2021	2022	2023	
Campus Stormwater Management UPPS 04.05.16	Once per year, review 25% of the UPPS for consistency with permit regulations. Update outdated or incorrect information at least once before the end of Year 5 (2024).	X	X	X	X	X	EHSRM Facilities Finance and Support Services
Post-Construction Stormwater Management Program	Once per year, review 25% of procedures in the Post-Construction Stormwater Management Program each year. Update outdated or incorrect information at least once before the end of Year 5 (2024).	X	X	X	X	X	EHSRM Grounds and Waste Management Utilities Operations Auxiliary Services Transportation Services
Inventory of Structural BMPs	Once per year, add at least 50% of newly constructed structural BMPs to the existing inventory table and map. Update outdated or incorrect information at least once before the end of Year 5 (2024).	X	X	X	X	X	EHSRM Facilities Planning, Design and Construction
	Once per year, review list of owners/operators (responsible departments) for BMP maintenance. Update outdated or incorrect information at least once before the end of Year 5 (2024).	X	X	X	X	X	

Post-Construction BMP Design Review	Within one year, revise existing checklists to follow for plan review.	X					EHSRM Facilities Planning, Design and Construction Utilities Operations
	Review 75% of drawings/specifications/ sediment & erosion control plans, SWPPP plans and drawings, and post-construction BMP selection on new construction and redevelopment.	X	X	X	X	X	
Inspection Program for Structural BMPs	Once per year, review structural BMP inspection forms and update as necessary. Update forms at least once before the end of Year 5 (2024).	X	X	X	X	X	EHSRM Grounds and Waste Management Utilities Operations Auxiliary Services Transportation Services
	Once per year, review BMP fact sheets. Update fact sheets at least once before the end of Year 5 (2024).	X	X	X	X	X	
	Once before the end of Year 5, use fact sheets to train BMP inspectors on inspection protocols.	X	X	X	X	X	
	Inspect 50% of structural BMPs once per year to assess functionality and maintenance needs.	X	X	X	X	X	
Operation and Maintenance of Structural BMPs	Upon completion of a construction project, obtain 100% of O&M plans (or use industry standard) for new structural BMPs.	X	X	X	X	X	EHSRM Grounds and Waste Management Utilities Operations Auxiliary Services Transportation Services
	Once per year, collaborate with responsible departments to assess structural BMP O&M needs based on O&M recommendations, inspection results, or both.	X	X	X	X	X	

SECTION 7 - MCM 5: POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

The pollution prevention/good housekeeping minimum control measure consists of BMPs that focus on the prevention or reduction of pollutant runoff from municipal operations (or municipal-type operations, in terms of the university). The BMPs in this section describe specific activities implemented to prevent or reduce stormwater pollution, including facility inventory, staff training, proper waste disposal, contractor oversight, assessment of operation and maintenance activities, inspection of pollution prevention measures, and structural control maintenance.

7.1 REGULATORY REQUIREMENTS

Part III Section B MCM 5: Pollution Prevention and Good Housekeeping for Municipal Operations

(a) Program Development

(1) All permittees shall develop and implement an operation and maintenance program, including an employee training component that has the ultimate goal of preventing or reducing pollutant runoff from municipal activities and municipally owned areas including but not limited to park and open space maintenance; street, road or highway maintenance; fleet and building maintenance; stormwater system maintenance; new construction and land disturbances; municipal parking lots; vehicle and equipment maintenance and storage yards; waste transfer stations; and salt/sand storage locations.

Existing permittees shall assess program elements that were described in the previous permit, modify as necessary, and develop and implement new elements, as necessary, to continue reducing the discharges of pollutants from the MS4 to the MEP. New elements must be fully implemented by the end of this permit term and newly regulated permittees shall have the program fully implemented by the end of this permit term. See also Part III.A.1.(c).

(b) Requirements for All Permittees

All permittees shall include the requirements described below in parts III.B.5.(1)-(6) in the program:

(1) Permittee-owned Facilities and Control Inventory

All permittees shall develop and maintain an inventory of facilities and stormwater controls that it owns and operates within the regulated area of the small MS4. The inventory must include all applicable permit numbers, registration number and authorizations for each facility or controls. The inventory must be available for review by TCEQ and must include, but is not limited, to the following, as applicable:

a. Composting facilities;
b. Equipment storage and maintenance facilities;
c. Fuel storage facilities;
d. Hazardous waste disposal facilities;
e. Hazardous waste handling and transfer facilities;
f. Incinerators;
g. Landfills;
h. Material storage yards;
i. Pesticide storage facilities;
j. Buildings, including schools, libraries, police stations, fire stations, and office buildings;
k. Parking lots;
l. Golf courses;
m. Swimming pools;
n. Public work yards;
o. Recycling facilities;
p. Salt storage facilities;
q. Solid waste handling and transfer facilities;
r. Street repair and maintenance sites;
s. Vehicle storage and maintenance yards; and
t. Structural stormwater controls.

(2) Training and Education

All permittees shall inform or train appropriate employees involved in implementing pollution prevention and good housekeeping practices. All permittees shall maintain a training attendance list for inspection by TCEQ when requested.

(3) Disposal of Waste Material – Waste material removed from the small MS4 must be disposed of in accordance with 30 TAC Chapters 330 or 335, as applicable.

(4) Contractor Requirements and Oversight

a. Any contractors hired by the permittee to perform maintenance activities on permittee-owned facilities must be contractually required to comply with all of the stormwater control measures, good housekeeping practices and facility-specific stormwater management operating procedures described in Parts III.B.5.(2)-(6).

b. All permittees shall provide oversight of contractor activities to ensure that contractors are using appropriate control measure sand SOPs. Oversight procedures must be developed before the end of the permit term and maintained on site and made available for inspections by TCEQ.

(5) Municipal Operation and Maintenance Activities

a. Assessment of permit-owned operations

All permittees shall evaluate operation and maintenance (O&M) activities for their potential to discharge pollutants in stormwater, including but not limited to:

(i) Road and parking lot maintenance may include such areas as

pothole repair, pavement marking, sealing and re-paving;

(ii) *Bridge maintenance, including such areas as re-chipping, grinding, and saw cutting;*

(iii) *Cold weather operations, including plowing, sanding and application of deicing and anti-icing compounds and maintenance of snow disposal areas; and*

(iv) *Right-of-way maintenance, including mowing, herbicide and pesticide application, and planting vegetation.*

b. *All permittees shall identify pollutants of concern that could be discharged from the above O&M activities (for example, metals; chlorides; hydrocarbons such as benzene, toluene, ethyl benzene, and xylenes; sediment; and trash).*

c. *All permittees shall develop and implement a set of pollution prevention measures that will reduce the discharge of pollutants in stormwater from the above activities. These pollution prevention measures may include the following examples:*

(i) *Replacing materials and chemical with more environmentally benign materials or methods;*

(ii) *Changing operations to minimize the exposure or mobilization of pollutions to prevent them from entering surface waters; and*

(iii) *Placing barriers around or conducting runoff away from deicing chemical storage areas to prevent discharge into surface waters.*

d. *Inspection of pollution prevention measures – All pollution prevention measures implemented at permit-owned facilities must be visually inspected to ensure they are working properly. The permittee shall develop written procedures that describes frequency of inspections and how they will be conducted. A log of inspections must be maintained and made available for review by the TCEQ upon request.*

(6) Structural Control Maintenance

If BMPs include structural controls, maintenance of the controls must be performed by the permittee and consistent with maintaining the effectiveness of the BMP. The permittee shall develop written procedures that define the frequency of inspections and how they will be conducted.

7.2 SELECTED BEST MANAGEMENT PRACTICES

7.2.1 Operation and Maintenance Program for Good Housekeeping and Pollution Prevention Activities

BMP Description: The University has developed a program describing procedures for incorporating good housekeeping and pollution prevention BMPs into operation and maintenance (O&M) activities for municipal-type facilities and locations on campus, including but not limited to:

- Parks and open space maintenance
- Fleet maintenance
- Stormwater system maintenance
- Parking lots maintenance
- Vehicle and equipment maintenance
- Storage yards
- Warehouses

The O&M Program includes general descriptions for different types of municipal-type facilities, potential pollutants that may be present in these facilities, and BMPs that facilities can implement to prevent or minimize pollution from O&M activities. Texas State departments with facilities designated as performing "operation and maintenance" will use the O&M Program as a guidance document to develop site-specific procedures on good housekeeping and pollution prevention activities for their facilities. Departments will identify specific pollution prevention BMPs for reducing the discharge of pollutants in stormwater runoff at their facility or location. Departments will perform internal inspections on facility conditions on a

routine basis to assess BMP implementation.

The O&M Program also describes procedures for conducting contractor oversight for good housekeeping and pollution prevention activities. Additional information on contractor oversight can be found in BMP 6.2.7.

Measurable Goals	Deadline/Implementation Schedule
1. Once per year, review 25% of procedures in the Operation and Maintenance Program for Good Housekeeping and Pollution Prevention Activities. Update outdated or incorrect information at least once before Year 5 (2024).	August 31 annually (2019 – 2023) (January 23, 2024)
2. Within two years, develop one site-specific Standard Operating Procedures per facility for Pollution Prevention and Good Housekeeping activities.	August 31 (2020)
3. Within five years, implement site-specific Standard Operating Procedures for each facility.	August 31 (2021)
4. Within five years, perform at least one site-specific inspection at each facility per year based on Standard Operating Procedures.	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Document which section(s) of the Good Housekeeping/Pollution Prevention Operation and Maintenance Program was reviewed annually.
2. Record review date(s), document updates, and summarize changes in the annual report.
3. Document number of SOPs developed for each facility by Year 2.

4. Document number of inspections performed annually (Year 3-5).

Responsible Parties:

- EHSRM
- Facilities (Facilities Management & Grounds and Waste Management)
- Campus Recreation
- Athletics
- Department of Housing and Residential Life
- Transportation Services
- Other applicable departments

Target Audience: Texas State staff and contractors.

7.2.2 Inventory of Permittee-Owned Facilities

BMP Description: Texas State has many different types of buildings and facilities within the MS4, including libraries, office buildings, and academic buildings. Additionally, some facilities on campus are intended to serve as municipal-type operations similar to a city. These facilities may include parks, sports fields, garages, materials storage, warehouses, compactors, and loading docks. Activities in some of these areas have the potential to contribute to non-point sources of pollution to the MS4. An inventory has been compiled which includes campus buildings, municipal-type facilities, or other applicable areas.

Measurable Goals	Deadline/Implementation Schedule
1. **Once per year, review inventory list of permittee-owned facilities. Update outdated or incorrect information at least once before Year 5 (2024).**	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Review inventory list annually and update as new facilities are added.
2. Record the total number of facilities identified in the annual report and indicate whether new facilities were added during the permit year.

Responsible Parties:

- EHSRM
- Facilities

Target Audience: Texas State staff.

7.2.3 Employee Training Program

BMP Description: Training on good housekeeping and pollution prevention activities is provided annually to staff in areas identified on the inventory list. Training materials will be obtained from available sources such as EPA, TCEQ, other MS4s, etc. Training will include information on pollution prevention practices and good housekeeping procedures.

Spill Prevention, Control and Countermeasures (SPCC) training is also provided to staff who work with oil or petroleum products.

Measurable Goals	Deadline/Implementation Schedule
1. **Provide training to 75% of applicable staff on good housekeeping/pollution prevention activities each year. Update training content at least once before the end of Year 5 (2024).**	August 31 annually (2019 – 2023) (January 23, 2024)
2. **Provide training to 75% of applicable staff on the SPCC Program. Update training content at least once before the end of Year 5 (2024).**	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Track number of staff trained annually on good housekeeping/pollution prevention training. Document for annual reporting.
2. Track number of staff trained annually on SPCC training. Document for annual reporting.
3. Review and update trainings at least once during the Permit Term.

Responsible Parties:

- EHSRM
- All Responsible Departments (identified in Section 1)

Target Audience: Texas State staff.

7.2.4 Oil Recycling Program

BMP Description: Texas State utilizes oil recycling through a third-party contracting service for several of its vehicle maintenance facilities, including the recycling or oily rags.

Monthly inspections of all used oil and new petroleum product storage areas will continue as part of the SPCC Program (outlined in MCM-2).

Measurable Goals	Deadline/Implementation Schedule
1. Utilize services for used oil recycling at least once per year.	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Maintain records of used oil recycling pickups.
2. Record volumes in annual report.

Responsible Parties:

- EHSRM
- Facilities (Facilities Management)
- Transportation Services

Target Audience: Texas State staff.

7.2.5 Characterize BMP Waste for Disposal

BMP Description: Texas State is responsible for characterizing wastes from structural BMPs for proper disposal. Wastes from structural BMPs may consist of sediment, aqueous sludge, floatables, litter, or water. Waste materials may contain heavy metals, petroleum hydrocarbons, coliform, oil and grease, or solids. Disposal options may fall under 30 TAC 330.3,

Municipal Solid Waste or 30 TAC 330.5 Special Waste. Regulation under 40 CFR 279 and 30 TAC 324 (oily waste) may also be applicable. Prior to disposal, the wastes will be characterized to determine the most appropriate disposal methods.

Measurable Goals	Deadline/Implementation Schedule
1. **Once per year, review campus stormwater BMP waste profiles and documentation. Update sampling analyses as needed. Update outdated or incorrect information at least once before the end of Year 5 (2024).**	August 31 annually (2019 – 2023) (January 23, 2024)
2. **As necessary, collect samples of wastes from campus BMPs for waste characterization.**	August 31 annually (2019 – 2023) (January 23, 2024)
3. **Once per year, document volumes of waste removed.**	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. As necessary, document updates to the campus waste determinations and waste profiles; summarize changes in the annual report.
2. Document the number of samples collected for waste characterization annually.
3. Document the volume of waste materials disposed of during BMP maintenance.

Responsible Parties:

- EHSRM
- Facilities (Grounds and Waste Management & Utilities Operations)
- Auxiliary Services

- Transportation Services
- Other applicable departments

Target Audience: Texas State staff.

7.2.6 Campus Standards for Turf Management

BMP Description: The 2015 Consolidated Landscape/Turf Irrigation and Management Program describes current practices performed by Texas State departments responsible for grounds/landscape maintenance and turf management. As an addendum to this document, Texas State developed the Campus Standards for Turf Management as a reference guide all departments can use for turf/landscape management. This document was designed as a non-structural BMP and outlines pollution prevention activities that may prevent pollutant loading of chemicals (herbicides, pesticide, and fertilizer) used during turf/landscape management, including the use of licensed applicators throughout campus.

Departments with turf/landscape management responsibilities will continue to utilize the Campus Standards for Turf Management and incorporate them into facility-specific SOPs (BMP 6.2.1).

Measurable Goals	Deadline/Implementation Schedule
1. **Once per year, review 25% of the Campus Standards for Turf Management. Update outdated or incorrect information at least once before Year 5 (2024).**	August 31 annually (2019 – 2023) (January 23, 2024)
2. **Once per year, obtain list of current licensed applicators on campus and retain records of licensed applicators on campus.**	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Track annual review of the Campus Standards for Turf Management program and record review date(s) in annual report.
2. As necessary, document updates to the program and summarize changes in the annual report.

Responsible Parties:

- EHSRM
- Facilities (Grounds and Waste Management)
- Campus Recreation
- Athletics
- Department of Housing and Residential Life

Target Audience: Texas State staff and contractors.

7.2.7 Contractor Oversight

BMP Description: Contractors working within the Texas State MS4 are required to comply with stormwater pollution prevention measures. BMPs for good housekeeping and pollution prevention activities are included in contract documents for contractors or subcontractors working on campus. Additionally, expectations for contractors working on campus and BMPs for pollution prevention are listed in UPPS 04.05.16. Landscape contractors are

also required to utilize BMPs identified in the Campus Standards for Turf Management.

Texas State is responsible for ensuring contractor compliance through random spot-checks and complaint-based inspections. Non-compliance will be addressed on a case-by-case basis. UPPS 04.05.16 outlines follow-up inspections, escalation procedures, and enforcement actions to address non-compliance issues.

Measurable Goals	Deadline/Implementation Schedule
1. **Respond to 100% of complaints for contractor non-compliance to address good housekeeping and pollution prevention BMPs.**	August 31 annually (2019 – 2023) (January 23, 2024)

Evaluation:

1. Maintain an electronic copy of the contract addendum that shows what BMPs contractors must follow to protect stormwater quality and the MS4.
2. Document number of complaint-based inspections for contractor activities. Indicate if any issues were found and how they were resolved.

Responsible Parties:

- EHSRM
- Facilities (Facilities Planning, Design and Construction; Grounds and Waste Management; Utilities Operations)
- Campus Recreation
- Athletics
- Department of Housing and Residential Life

Target Audience: Texas State staff and contractors.

7.3 Five Year Program Summary

Table 7-1 presents a five year summary of MCM-5 BMPs and schedule of implementation

Table 7 - 1 POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS							
Best Management Practice	**Measurable Goals**	**Deadline (August 31, annually)**					**Responsible Departments**
		2019	2020	2021	2022	2023	
Operation and Maintenance Program for Good Housekeeping and Pollution Prevention Activities	Once per year, review 25% of procedures in the Operation and Maintenance Program for Good Housekeeping and Pollution Prevention Activities. Update outdated or incorrect information at least once before Year 5 (2024).	X	X	X	X	X	EHSRM Facilities Management Grounds and Waste Management Campus Recreation Athletics Department of Housing and Residential Life Transportation Services Other applicable departments
	Within two years, develop one site-specific Standard Operating Procedures per facility for Pollution Prevention and Good Housekeeping activities.		X				
	Within five years, implement site-specific Standard Operating Procedures for each facility.			X	X	X	
	Within five years, perform at least one site-specific inspection at each facility per year based on Standard Operating Procedures.			X	X	X	
Inventory of Permittee-Owned Facilities	Once per year, review inventory list of permittee-owned facilities. Update outdated or incorrect information at least once before Year 5 (2024).	X	X	X	X	X	EHSRM Facilities
Employee Training Program	Provide training to 75% of applicable staff on good housekeeping/pollution prevention activities each year. Update training content at least once before the end of Year 5 (2024).	X	X	X	X	X	EHSRM All Responsible Departments
	Provide training to 75% of applicable staff on the SPCC Program. Update training content at least once before the end of Year 5 (2024).	X	X	X	X	X	

Table 7 - 1 POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS							
Best Management Practice	**Measurable Goals**	**Deadline (August 31, annually)**					**Responsible Departments**
		2019	2020	2021	2022	2023	
Oil Recycling Program	Utilize services for used oil recycling at least once per year.	X	X	X	X	X	EHSRM Facilities Management Transportation Services
Characterize BMP Waste for Disposal	Once per year, review campus stormwater BMP waste profiles and documentation. Update sampling analyses as needed. Update outdated or incorrect information at least once before the end of Year 5 (2024).	X	X	X	X	X	EHSRM Grounds and Waste Management Utilities Operations) Auxiliary Services Transportation Services Other applicable departments
	As necessary, collect samples of wastes from campus BMPs for waste characterization.	X	X	X	X	X	
	Once per year, document volumes of waste removed.	X	X	X	X	X	
Campus Standards for Turf Management	Once per year, review 25% of the Campus Standards for Turf Management. Update outdated or incorrect information at least once before Year 5 (2024).	X	X	X	X	X	EHSRM Grounds and Waste Management Campus Recreation Athletics Department of Housing and Residential Life
	Once per year, obtain list of current licensed applicators on campus and retain records of licensed applicators on campus.	X	X	X	X	X	

Table 7 - 1 POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS							
Best Management Practice	**Measurable Goals**	**Deadline (August 31, annually)**					**Responsible Departments**
		2019	2020	2021	2022	2023	
Contractor Oversight	Respond to 100% of complaints for contractor non-compliance to address good housekeeping and pollution prevention BMPs.	X	X	X	X	X	EHSRM Facilities Planning, Design and Construction Grounds and Waste Management Utilities Operations Campus Recreation Athletics Department of Housing and Residential Life

SECTION 8 - RECORDKEEPING AND REPORTING

As detailed in TPDES General Permit TXR040000, the University must document and report the implementation of all stormwater BMPs throughout the course of the permit period, and the TCEQ will require that the University submit annual reports to document the development and implementation of the SWMP.

8.1 RECORDKEEPING

The University must comply with the following recordkeeping requirements:

1. Retain all records, a copy of the TPDES general permit, and records of all data used to complete the application (NOI) for the general permit and satisfy the public participation requirements, for a period of at least 3 years or the remainder of the term of this general permit, whichever is longer. This period may be extended by the executive director at any time.

2. Submit records to the executive director only when specifically asked to do so. The SWMP required by this general permit (including a copy of the general permit) must be retained at a location accessible to the TCEQ.

3. Make the NOI and the SWMP available to the public at reasonable times during regular business hours, if requested to do so in writing. Copies of the SWMP must be made available within ten (10) working days of receipt of a written request. Other records must be provided in accordance with the Texas Public Information Act.

4. The period during which records are required to be kept shall be automatically extended to the date of the final disposition of any administrative or judicial enforcement action that may be instituted against the permittee.

As previously referenced, a copy of the SWMP and all annual reports will be accessible on the University's stormwater website. Individuals may also contact

the University's Environmental Health Safety and Risk Management Department to request additional program documentation.

8.2 REPORTING

The University will submit an Annual Report to the TCEQ within ninety days (90) at the end of each fiscal year as allowed by TPDES General Permit TXR040000 Part IV.B.2. The University's fiscal year ends on August 31st so the annual report would be due to the TCEQ on November 30th each year. The first reporting year for any reporting purposes shall begin on the permit effective date, and shall last for a period of one year (the end of the "permit year"). Alternatively, if the permittee elects to report based on its fiscal year, the first reporting year will last until the end of the fiscal year following the end of the first permit year. The report must include:

1. ***Noncompliance Notification*** - According to 30 TAC 305.125 (9), any noncompliance which may endanger human health or safety, or the environment, must be reported by the permittee to the TCEQ. The report must be made orally or electronically within 24 hours of the incident. A written report must be submitted to the regional TCEQ office and the TCEQ Enforcement Division (MC-224) within 5 working days of the noncompliance incident. The report must contain the five elements in Section IV.B.1.1 of the general permit.

2. ***Other Information*** – When the permittee becomes aware that it either submitted incorrect information or failed to submit complete and accurate information requested in an NOI, NOT, or NOC, or any other report, the permittee must promptly submit the facts or information to the executive director.

3. ***Annual Report*** – The annual report will include:
    a. The status of the compliance with permit conditions, an assessment of the appropriateness of the identified BMPs, progress towards achieving the statutory goal of reducing the discharge of pollutant to

the maximum extent practicable and an evaluation of the success of the implantation of the measurable goals;

b. A summary of the results of information collected and analyzed, during the reporting period, including monitoring data used to assess the success of the program at reducing the discharge of pollutants to the maximum extent practicable;
c. If applicable, a summary of any activities taken to address the discharge to impaired waterbodies, including any sampling results and a summary of the small MS4s BMPs used to address the pollutant of concern;
d. A summary of the stormwater activities the MS4 operator plans to undertake during the next reporting year;
e. Proposed changes to the SWMP, including changes to any BMPs or any identified measurable goals that apply to the program elements;
f. Description and schedule for implantation of the additional BMPs that may be necessary, based on monitoring results, to ensure compliance with applicable TMDSs and implementation plans;
g. Notice that the MS4 operator is relying on another government entity to satisfy some of the permit obligation (if applicable);
h. If applicable, the number of construction activities where the small MS4 is the operator and authorized under the 7th optional MCM, including the total number of acres disturbed; and
i. If applicable, the number of construction activities that occurred within the jurisdictional area of the small MS4 (as noticed to the permittee by the construction operator), and that were not authorized under the 7th MCM.

Items (h) and (i) only apply if the permittee is including MCM-7 in the SWMP. The University is not choosing to implement the optional MCM-7.

An annual report must be prepared whether or not the NOI and SWMP have been approved by the TCEQ. If the permittee has either not implemented the SWMP or not begun to implement the SWMP because it has not received approval on the NOI and SWMP, then the annual report

may include that information.

The annual report must be submitted on TCEQ approved forms (Small Business and Local Government Assistance MS4 Annual Report Template, or similar). The annual report must be submitted to the TCEQ Central Office as well as the Region 11 office:

Central Office:

Stormwater Team (MC-148)
Texas Commission on Environmental Quality
Water Quality Division
P.O. Box 13087
Austin, Texas 78711-3087

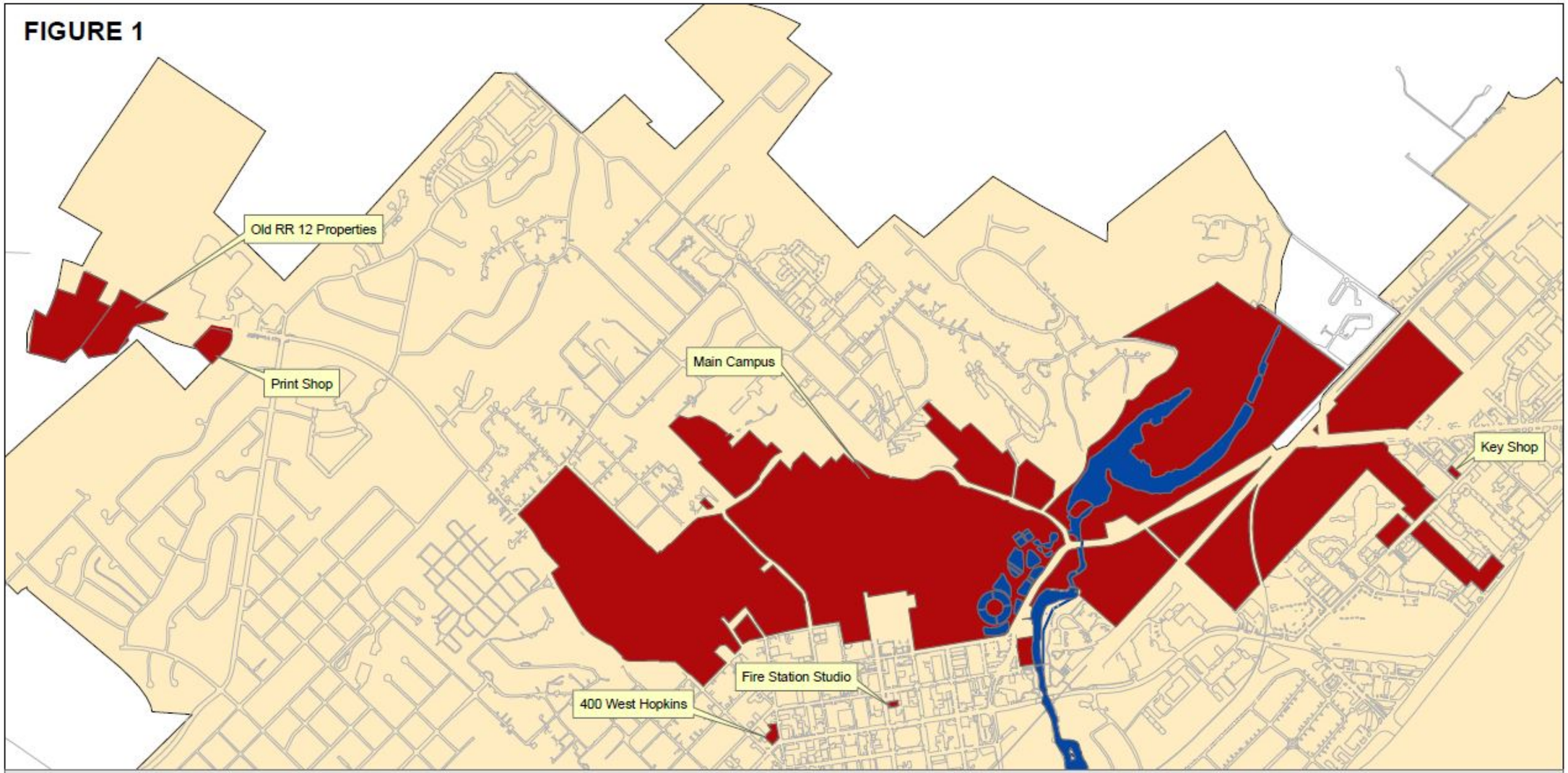
Region 11 Office:

Stormwater and Pretreatment Team Leader (MC-R11)
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

The TCEQ encourages the submittal of electronic submissions of annual reports to comply with the Federal Waste Reduction Act and the Government Paperwork Elimination Act for electronic submissions. The TCEQ website www.tceq.texas.gov has additional information and instructions.

APPENDIX A – FIGURES

FIGURE 1



URBANIZED AREAS IN RELATION TO TEXAS STATE UNIVERSITY PROPERTIES IN HAYS COUNTY

The Census Bureau's urban-rural classification is fundamentally a delineation of geographical areas indentifying both individual urban areas and the rural areas of the nation. The Census Bureau's urban areas represent densly developed territory, and encompass residential, commercial, and other non-residential urban land uses.

Urbanized Area (UAs) of 50,000 or more people.

2010 Ubaninzed Area
Campus Property

TEXAS STATE UNIVERSITY

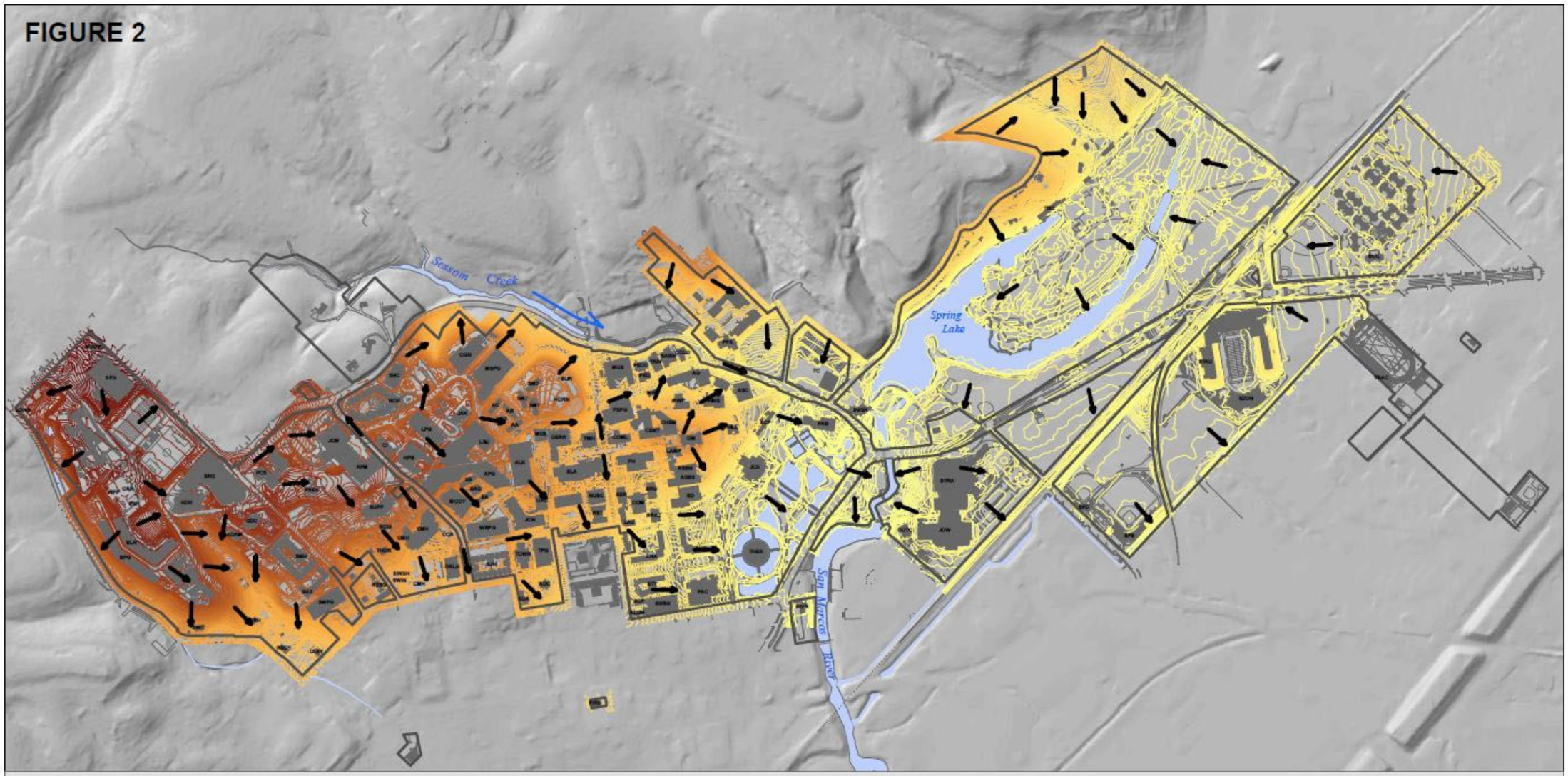
Sources:
Base Map & Properties - Texas State University Facilities, 2019..
Highways/Rivers - CAPCO, 2008
Hays County Roads - Hays County GIS, 2010.
City Limits - CAPCOG, 2017.

0 500 1,000 2,000 3,000 4,000 Feet

0 0.125 0.25 0.5 0.75 1 Miles

7/2019

FIGURE 2



OVER-LAND STORM WATER FLOW DIRECTION

PROPERTY BOUNDARY

0 500 1,000 2,000 3,000 4,000 Feet

Elevation (MSL)

791'

562'

7/2019

TEXAS STATE UNIVERSITY

Sources:
Campus Base Map Data, boundary, color topography - Texas State University Facilities Dept., 2019.
City Buldings and streets - Texas State University Facilities Dept.. 2018.
Tooo Hillshade DEM - Created from TNRIS contour interval data, 2012.
Edwards Aquifer Zones - TCEQ Website, shapefile, 2011.

FIGURE 3

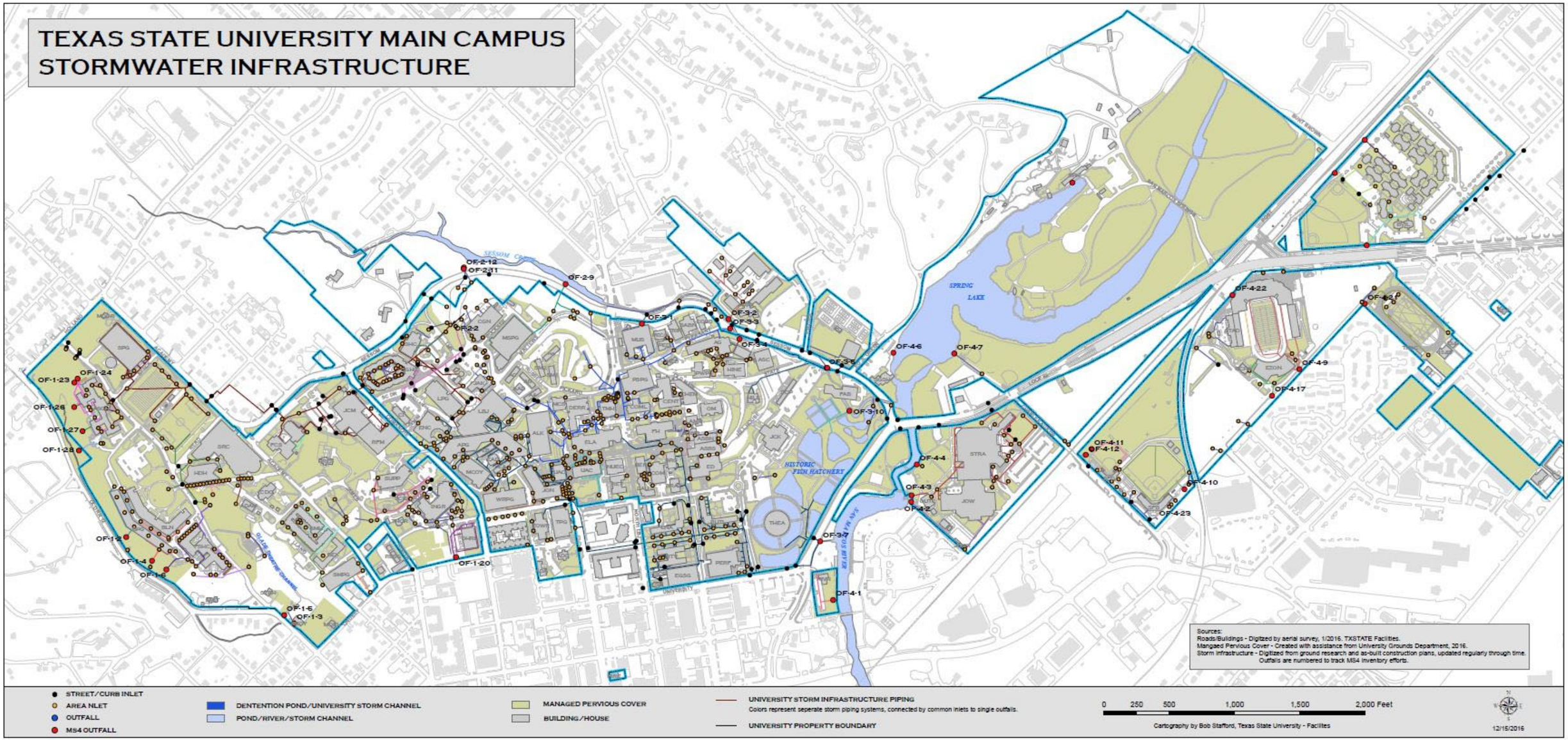

TEXAS STATE UNIVERSITY MAIN CAMPUS
STORMWATER INFRASTRUCTURE
SESSOM CREEK
SPRING LAKE
HISTORIC FISH HATCHERY
SLATE SPRING CHANNEL
OF-1-1
OF-1-2
OF-1-3
OF-1-4
OF-1-5
OF-1-6
OF-1-20
OF-1-23
OF-1-24
OF-1-26
OF-1-27
OF-1-28
OF-2-1
OF-2-2
OF-2-9
OF-2-11
OF-2-12
OF-3-1
OF-3-2
OF-3-3
OF-3-4
OF-3-5
OF-3-7
OF-3-10
OF-4-1
OF-4-2
OF-4-3
OF-4-4
OF-4-6
OF-4-7
OF-4-9
OF-4-10
OF-4-11
OF-4-12
OF-4-17
OF-4-22
OF-4-23
Sources:
Roads/Buildings - Digitized by aerial survey, 1/2016. TXSTATE Facilities.
Mangaed Pervious Cover - Created with assistance from University Grounds Department, 2016.
Storm Infrastructure - Digitized from ground research and as-built construction plans, updated regularly through time.
Outfalls are numbered to track MS4 inventory efforts.
STREET/CURB INLET
AREA NLET
OUTFALL
MS4 OUTFALL
DENTENTION POND/UNIVERSITY STORM CHANNEL
POND/RIVER/STORM CHANNEL
MANAGED PERVIOUS COVER
BUILDING/HOUSE
UNIVERSITY STORM INFRASTRUCTURE PIPING
Colors represent seperate storm piping systems, connected by common inlets to single outfalls.
UNIVERSITY PROPERTY BOUNDARY
0 250 500 1,000 1,500 2,000 Feet
Cartography by Bob Stafford, Texas State University - Facilites
12/15/2016

FIGURE 4

EDWARDS AQUIFER RECHARGE ZONES

PROPERTY BOUNDARY

0 500 1,000 2,000 3,000 4,000 Feet

Edwards Aquifer Contributing Zone within the Transition Zone
Edwards Aquifer Recharge Zone
Edwards Aquifer Transition Zone

7/2019

TEXAS STATE UNIVERSITY

Sources:
Campus Base Map Data and Boundary - Texas State University Facilities Dept., 2019.
City Buildings and streets - Texas State University Facilities Dept.. 2018.
Tooo Hillshade DEM - Created from TNRIS contour interval data, 2012.
Edwards Aquifer Zones - TCEQ Website, shapefile, 2011.

APPENDIX B – COMMONLY USED ACRONYMS

BMP	Best Management Practice
CFR	Code of Federal Regulations
CGP	Construction General Permit, TXR150000
CWA	Clean Water Act
DMR	Discharge Monitoring Report
EAA	Edwards Aquifer Authority
EPA	Environmental Protection Agency
FR	Federal Register
IDDE	Illicit Discharge Detection and Elimination
IP	Implementation Procedures
MCM	Minimum Control Measure
MEP	Maximum Extent Practicable
MSGP	Multi-Sector General Permit, TXR050000
MS4	Municipal Separate Storm Sewer System
NOC	Notice of Change
NOD	Notice of Deficiency NOI Notice of Intent
NOT	Notice of Termination (to terminate coverage under a general permit)
NPDES	National Pollutant Discharge Elimination System
SWMP	Storm Water Management Program
SWPPP	Storm Water Pollution Prevention Plan
TAC	Texas Administrative Code
TCEQ	Texas Commission on Environmental Quality
TMDL	Total Maximum Daily Load
TDS	Total Dissolved Solids
TPDES	Texas Pollutant Discharge Elimination System
TWC	Texas Water Code
WPAP	Water Pollution Abatement Plan
WPP	Watershed Protection Plan

APPENDIX C – TPDES GENERAL PERMIT TXR040000

Texas Commission on Environmental Quality

P.O. Box 13087, Austin, Texas 78711-3087

GENERAL PERMIT TO DISCHARGE UNDER THE

TEXAS POLLUTANT DISCHARGE ELIMINATION SYSTEM

under provisions of
402 of the Clean Water Act
and Chapter 26 of the Texas Water Code

This permit supersedes and replaces
TPDES General Permit No. TXR040000, issued December 13, 2013

Small Municipal Separate Storm Sewer Systems

located in the state of Texas

may discharge directly to surface water in the state

only according to requirements and conditions set forth in this general permit, as well as the rules of the Texas Commission on Environmental Quality (TCEQ or Commission), the laws of the State of Texas, and other orders of the the TCEQ. The issuance of this general permit does not grant to the permittee the right to use private or public property for conveyance of stormwater and certain non-stormwater discharges along the discharge route. This includes property belonging to but not limited to any individual, partnership, corporation or other entity. Neither does this general permit authorize any invasion of personal rights nor any violation of federal, state, or local laws or regulations. It is the responsibility of the permittee to acquire property rights as may be necessary to use the discharge route.

This general permit and the authorization contained herein shall expire at midnight, five years after the permit effective date.

EFFECTIVE DATE: 1-24-19

ISSUED DATE: 1-24-19

For the Commission