

## Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number TXR040000

### A. General Information

#### 1. Permit Specific Information

Assigned Authorization Number: **TXR040427**

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

Annual Reporting Year Option Selected by MS4:

Calendar Year \_\_\_\_\_

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

Fiscal Year: **X** Last day of fiscal year: (**August 31, 2020**)

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

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

MS4 Operator Level: **2**

Name of Permittee / Owner / Operator of MS4: **Texas State University**

Contact Name: **Wendy McCoy** Telephone Number: **(512) 245-3616**

Mailing Address: **601 University Dr. San Marcos, Texas 78666**

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A copy of the annual report was submitted to the TCEQ Region YES **X** NO \_\_\_\_\_

Region the annual report was submitted to, TCEQ Region: **11**

**B. Status of Compliance with the MS4 GP and SWMP**

1. Provide information on the status of complying with permit conditions: (TXR040000 Part IV Section B.2.):

	Yes	No	Explain
Permittee is currently in compliance with the SWMP as submitted to and approved by the TCEQ.		<b>X</b>	Select measurable goals were out of compliance due to force majeure caused by COVID-19 restrictions.
Permittee is currently in compliance with recordkeeping and reporting requirements.	<b>X</b>		TCEQ routine compliance investigation was conducted on 04/23/2019.
Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.)	<b>X</b>		TCEQ routine compliance investigation was conducted on 04/23/2019.
Permittee has conducted an annual review of its SWMP in conjunction with preparation of the annual report as required in Part II E.4. Results of this review are documented in this report.	<b>X</b>		Yes, annual review of the SWMP has been conducted in conjunction with preparing the annual report.

2. Provide a general assessment of the appropriateness of the selected BMPs in reducing the discharge of pollutants to the maximum extent practicable (MEP). See Table 1.

<b>Table 1: BMP Status</b>		
<b>MCM(s)</b>	<b>BMP</b>	<b>BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer yes or no, and explain).</b>
1. Public Education, Outreach and Involvement	Comprehensive Stormwater Education and Outreach Program	Yes, this BMP is appropriate. Texas State MS4 staff utilize multiple methods of education and outreach for stormwater pollution prevention and awareness. This is conducted by staff educating the University's target audience on methods of how stormwater can become polluted and how to minimize pollution. These education and outreach methods are implemented throughout the permit term. These activities indirectly contributed to a lower discharge of pollutants to the MS4.
	Stormwater Quality Education and Outreach Materials	Yes, this BMP is appropriate. Stormwater quality educational materials and methods were implemented throughout Year 2 utilizing the "What Goes Here Flows Here" logo. Educational materials were provided at local outreach events to promote stormwater awareness and environmental stewardship. Use of social media was continued to reach a broader audience. These activities indirectly contributed to a lower discharge of pollutants to the MS4.
	Education/Training for Construction Personnel	Yes, this BMP is appropriate. Annual stormwater construction training was conducted for University construction personnel. Subsequent training opportunities were encouraged throughout the year for those with erosion and sediment control certifications (such as CISEC and CESSWI). Orientation trainings were also provided to contractors and subcontractors for new construction and redevelopment projects. The trainings provided construction personnel with an understanding of effective erosion and sediment control methods and best management practices to employ on construction sites. These activities indirectly contributed to a lower discharge of pollutants to the MS4.

**Table 1: BMP Status**

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer yes or no, and explain).
1. Public Education, Outreach and Involvement	Education and Outreach for Pollution Prevention	Yes, this BMP is appropriate. The education and outreach messages using the “What Goes Here Flows Here” logo was continued in Year 2 and continued to increase awareness of stormwater pollution for students, staff and faculty and the different ways pollutants can reach the waterways. These activities indirectly contributed to a lower discharge of pollutants to the MS4.
	Web Page and Community Hotlines	Yes, this BMP is appropriate. Texas State utilizes the illicit discharge detection and elimination hotline (512-245-IDDE) and online reporting form as a way for students, staff, and faculty to report unauthorized discharges that they identify on campus. These methods of reporting increases awareness of illicit discharges and illegal dumping activities on campus. The webpage helps to educate the public on basic stormwater awareness, education and outreach events, public involvement opportunities for events focused around reducing pollutants in stormwater runoff, and MS4 documentation and reporting. These activities indirectly contributed to a lower discharge of pollutants to the MS4.
	Public Notice Requirements	Yes, this BMP is appropriate. By informing the campus community of the goals of the Stormwater Management Program, the public can become informed on issues related to stormwater awareness. These activities indirectly contributed to a lower discharge of pollutants to the MS4; however, this BMP was not implemented as SWMP was not yet technically reviewed or approved by TCEQ. Goals within BMP extended to Year 3.

**Table 1: BMP Status**

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer yes or no, and explain).
1. Public Education, Outreach and Involvement	Advisory Committee	Yes, this BMP is appropriate. By improving communication with campus stakeholders, the Stormwater Management Program can address stormwater pollution issues directly and more effectively. These activities indirectly contributed to a lower discharge of pollutants to the MS4.
	Public Involvement and Outreach Events	Yes, this BMP is appropriate. Texas State promotes stormwater awareness by participating in community events with handouts and guidance materials that focus on reducing non-point source pollution in waterways. Students, faculty, and staff participate in volunteer events that address stormwater pollution. These activities directly and indirectly contributed to a lower discharge of pollutants to the MS4.
2. Illicit Discharge, Detection and Elimination	Campus Stormwater Management UPPS 04.05.16	Yes, this BMP is appropriate. The Campus Stormwater Management University Policy and Procedures Statement (UPPS) 04.05.16 serves as the university's ordinance/internal policy and was recently updated (2019). This policy prohibits illicit discharges to the MS4, soil, or waters of the state and requires all contractors to adhere to UPPS 04.05.16. These activities indirectly contributed to a lower discharge of pollutants to the MS4.

**Table 1: BMP Status**

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer yes or no, and explain).
2. Illicit Discharge, Detection and Elimination	Prevention of Illicit Connections between Storm and Sanitary Sewers	Yes, this BMP is appropriate. Prohibiting cross-connections between storm and sanitary sewers in the design phase, as well as confirming no cross-connections once the construction is complete, it important to prevent stormwater pollution. These activities directly and indirectly contributed to a lower discharge of pollutants to the MS4.
	Investigate and Prevent Sanitary Sewer Overflows	Yes, this BMP is appropriate. By inspecting campus infrastructure and monitoring for deficiencies or other issues, as well as regularly maintaining pre-treatment units, the likelihood of unauthorized discharges (and subsequent stormwater pollution) is decreased over time. These activities directly and indirectly contributed to a lower discharge of pollutants to the MS4.
	Storm Sewer Mapping	Yes, this BMP is appropriate. By updating maps with new storm sewer piping and inlets added during construction, Texas State MS4 staff can easily track illicit discharges to the source. These activities directly and indirectly contributed to a lower discharge of pollutants to the MS4.
	Illicit Discharge Detection and Elimination Program	Yes, this BMP is appropriate. The IDDE program allows Texas State staff to understand internal procedures for identifying, tracking, and isolating illicit discharges and preventing discharge to the MS4, when possible. These activities directly and indirectly contributed to a lower discharge of pollutants to the MS4.

**Table 1: BMP Status**

<b>MCM(s)</b>	<b>BMP</b>	<b>BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer yes or no, and explain).</b>
2. Illicit Discharge, Detection and Elimination	Training on Illicit Discharge Detection, Reporting, and Response	Yes, this BMP is appropriate. Field personnel trained in outfall monitoring procedures as well as IDDE identification and response procedures are better prepared to identify and isolate potential illicit discharges. These activities indirectly contributed to a lower discharge of pollutants to the MS4.
	IDDE Hotline Number and Follow-Up Procedures	Yes, this BMP is appropriate. The goal of the IDDE hotline number is to improve public awareness and notifications of illicit discharges and increase the frequency of reports for potential releases. The hotline serves as a resource for the university community and allows for corrective action to stop or prevent the release of pollutants to local waterways. These activities directly and indirectly contributed to a lower discharge of pollutants to the MS4.
	Hazardous Waste and Recycle Material Collection Programs	Yes, this BMP is appropriate. The routine collection of hazardous waste resulted in the safe transfer and storage of expired or used chemicals to the RCRA Hazardous Waste Storage Unit, as opposed to outside storage, landfill disposal, or abandonment. Oil, plastics, paper, and glass were also successfully kept out of the storm sewer system by routine collection and proper management and disposal. These activities directly and indirectly contributed to a lower discharge of pollutants to the MS4.

**Table 1: BMP Status**

<b>MCM(s)</b>	<b>BMP</b>	<b>BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer yes or no, and explain).</b>
3. Construction Site Stormwater Runoff Control	Campus Stormwater Management UPPS 04.05.16	Yes, this BMP is appropriate. The Campus Stormwater Management University Policy and Procedures Statement (UPPS) 04.05.16 serves as the university’s ordinance/internal policy and was recently updated (2019). This policy prohibits illicit discharges to the MS4, soil, or waters of the state and requires all contractors to adhere to UPPS 04.05.16. This policy outlines requirements for stormwater management on construction sites as well as address noncompliance. These activities indirectly contributed to a lower discharge of pollutants to the MS4.
	MS4 Compliance Plan for Construction Activities	Yes, this BMP is appropriate. By implementing standards for campus construction activities, contractors understand expectations and requirements when moving forward with new construction or redevelopment projects. These activities indirectly contributed to a lower discharge of pollutants to the MS4.
	MS4 Compliance Inspections	Yes, this BMP is appropriate. Routine inspections between Texas State University departments and the General Contractor on construction sites have resulted in identifying areas where BMPs require maintenance or replacement. These activities directly and indirectly contributed to a lower discharge of pollutants to the MS4.



**Table 1: BMP Status**

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer yes or no, and explain).
4. Post-construction Stormwater Management in New Development and Redevelopment	Campus Stormwater Management UPPS 04.05.16	Yes, this BMP is appropriate. The Campus Stormwater Management University Policy and Procedures Statement (UPPS) 04.05.16 serves as the university’s ordinance/internal policy and was recently updated (2019). This policy prohibits illicit discharges to the MS4, soil, or waters of the state and requires all contractors to adhere to UPPS 04.05.16. This UPPS requires the routine maintenance and inspections of post-construction BMPs to ensure effective performance. These activities indirectly contributed to a lower discharge of pollutants to the MS4.
	Post-Construction Stormwater Management Program	Yes, this BMP is appropriate. The procedures in the MS4 Compliance Plan for Construction Activities addresses selection of post construction BMPs for water quality, which establishes guidance and standards for contractors as well as campus departments responsible for maintenance. These activities indirectly contributed to a lower discharge of pollutants to the MS4.
	Inventory of Structural BMPs	Yes, this BMP is appropriate. Maintaining an inventory of structural BMPs on campus allows MS4 staff to track newly added BMPs and follow up with maintenance needs. These activities indirectly contributed to a lower discharge of pollutants to the MS4.

**Table 1: BMP Status**

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer yes or no, and explain).
4. Post-construction Stormwater Management in New Development and Redevelopment	Post-Construction BMP Design Review	Yes, this BMP is appropriate. Reviewing plans for post-construction BMPs allow MS4 staff to make recommendations on when post-construction BMPs are appropriate on new construction sites. These activities indirectly contributed to a lower discharge of pollutants to the MS4.
	Inspection Program for Structural BMPs	Yes, this BMP is appropriate. The routine inspection of BMPs helps to identify maintenance needs and allows for a check and balance system, ensuring that BMPs are operating as intended and resulting in improved water quality. These activities directly and indirectly contributed to a lower discharge of pollutants to the MS4.
	Operation and Maintenance of Structural BMPs	Yes, this BMP is appropriate. Maintenance of BMPs improve performance of BMPs, overall functionality of the unit, and effluent water quality. These activities directly and indirectly contributed to a lower discharge of pollutants to the MS4.

**Table 1: BMP Status**

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer yes or no, and explain).
5. Pollution Prevention/Good Housekeeping for Municipal Operations	Operation and Maintenance Program for Good Housekeeping and Pollution Prevention Activities	Yes, this BMP is appropriate. The Operation and Maintenance Program for Good Housekeeping/Pollution Prevention helps identify pollutant sources at municipal-type facilities, which allows departments to develop appropriate BMPs for municipal-type operations. This process helps to limit the potential number of pollutants released into the storm sewer system because of day-to-day operations. These activities directly and indirectly contributed to a lower discharge of pollutants to the MS4.
	Inventory of Permittee-Owned Facilities	Yes, this BMP is appropriate. By inventorying all facilities on campus, the MS4 can identify areas that have the potential to contribute to stormwater pollution. These activities indirectly contributed to a lower discharge of pollutants to the MS4.
	Employee Training Program	Yes, this BMP is appropriate. Annual training of the Spill Prevention Control and Countermeasures (SPCC) Program educates employees on proper storage, transport, and disposal of oil, as well as proper notification and clean-up procedures for hydrocarbon spills. Field personnel trained on the Good Housekeeping/Pollution Prevention (GHPP) Program are better prepared to maintain clean workspaces and prevent pollution in their daily job duties. These activities indirectly contributed to a lower discharge of pollutants to the MS4.

**Table 1: BMP Status**

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer yes or no, and explain).
5. Pollution Prevention/Good Housekeeping for Municipal Operations	Oil Recycling Program	Yes, this BMP is appropriate. The routine collection of used oil for recycling aided in the success of keeping petroleum products from being illegally dumped. These activities directly and indirectly contributed to a lower discharge of pollutants to the MS4.
	Characterize BMP Wastes for Disposal	Yes, this BMP is appropriate. Wastes are characterized for proper disposal at an off-site facility in accordance with state and federal law. These activities indirectly contributed to a lower discharge of pollutants to the MS4.
	Campus Standards for Turf Management	Yes, this BMP is appropriate. The development and implementation of the Campus Standard for Turf Management has increased awareness of pollutant sources from fertilizers and pesticides and instilled practices to reduce those pollutants from entering the San Marcos River. These activities indirectly contributed to a lower discharge of pollutants to the MS4.
	Contractor Oversight	Yes, this BMP is appropriate. Monitoring contractor activities to ensure the UPPS 04.05.16 is enforced helps to increase awareness of campus policy and decrease the potential number pollutants released into the storm sewer system as a result of contractor operations. These activities directly and indirectly contributed to a lower discharge of pollutants to the MS4.

3. Describe progress towards reducing the discharge of pollutants to the maximum extent practicable (MEP). Summarize any information used (such as monitoring data) to evaluate reductions in the discharge of pollutants. Use a table or attach a narrative description as appropriate:

<b>Table 2: Pollutant Reduction Analysis</b>					
<b>MCM</b>	<b>BMP</b>	<b>Information Used</b>	<b>QTY</b>	<b>Units</b>	<b>Does BMP Demonstrate a Direct Reduction in Pollutants (Answer Yes or No and explain)</b>
1. Public Education, Outreach and Involvement	BMP 3.2.1 Comprehensive Stormwater Education and Outreach Program	Administrative document	1	Internal guidance document	No. This BMP does not result in direct reduction of pollutants; however, it does outline methods of education and outreach for the MS4 Operator.
	BMP 3.2.2 Stormwater Quality Education and Outreach Materials	Educational information	13,637	Educational flyers (brochures, handouts) and promotional items (e.g. flyers, water bottles, car decals, koozies, pens, keychains, mesh trash bags, t-shirts, cups, hand fans)	No. This BMP does not result in direct reduction of pollutants; however, it does educate target audiences on pollution prevention practices.
			154,003	Digital Media Outreach (e.g. social media posts, cable TV advertisements, campus-wide emails)	

**Table 2: Pollutant Reduction Analysis**

MCM	BMP	Information Used	QTY	Units	Does BMP Demonstrate a Direct Reduction in Pollutants (Answer Yes or No and explain)
1. Public Education, Outreach and Involvement	BMP 3.2.3 Education/Training for Construction Personnel	Training materials (Texas State staff)	8	Video training on green infrastructure and SWPPP	No. This BMP does not result in direct reduction of pollutants; however, it does educate staff and contractors on pollution prevention practices.
		Training materials (contractors)	427	PowerPoint Training Slides and on-site field training	
	BMP 3.2.4 Education and Outreach for Pollution Prevention	Awareness messages	4,560	Emails and classroom/on-site training	No. This BMP does not result in direct reduction of pollutants; however, it does educate target audiences on pollution prevention practices.
		Educational information	See above (3.2.2)	Digital Media Outreach (e.g. social media posts, cable TV advertisements, campus-wide emails)	
	BMP 3.2.5 Web Page and Community Hotlines	Awareness Messages	n/a	Online documents, educational resources	No. This BMP does not result in direct reduction of pollutants; however, it does provide program managers with a vehicle to provide information and resources to the campus community.

**Table 2: Pollutant Reduction Analysis**

MCM	BMP	Information Used	QTY	Units	Does BMP Demonstrate a Direct Reduction in Pollutants (Answer Yes or No and explain)
1. Public Education, Outreach and Involvement	BMP 3.2.6 Public Notice Requirements	n/a	n/a	n/a	N/A. SWMP not yet technically reviewed or approved by TCEQ, therefore public notice has not been posted.
	BMP 3.2.7 Stormwater Management Program Advisory Committee	Meeting	16	Attendees	No. This BMP does not result in direct reduction of pollutants; however, it does educate target audiences on pollution prevention practices and allow for discussion of stormwater management practices.
	BMP 3.2.8 Public Involvement and Outreach Events	Awareness messages and promotional items	1,446	Number of volunteers provided training/information, promotional items, etc. at public participation events	Yes. By involving students and community members in river clean-ups, volunteers can remove pollutants directly from waterways or post educational signage discouraging pollution.
		Awareness messages	1,328	Total hours worked by volunteers	

**Table 2: Pollutant Reduction Analysis**

MCM	BMP	Information Used	QTY	Units	Does BMP Demonstrate a Direct Reduction in Pollutants (Answer Yes or No and explain)
1. Public Education, Outreach and Involvement	BMP 3.2.8 Public Involvement and Outreach Events	Awareness messages	4 manhole covers 15 inlets	Individual Inlet Markers & Manhole Covers	Yes. By involving students and community members in river clean-ups, volunteers can remove pollutants directly from waterways or post educational signage discouraging pollution.
2. Illicit Discharge Detection and Elimination	BMP 4.2.1 Campus Stormwater Management UPPS 04.05.16	Administrative document	1	Internal policy	No. This BMP does not result in direct reduction of pollutants; however, it does prohibit illicit discharges and illegal dumping on campus.
	BMP 4.2.2 Prevention of Illicit Connections between Storm and Sanitary Sewers	Plan Reviews	19	Comments	Yes. By conducting plan reviews and providing comments regarding cross-connection prohibition, construction staff are required to confirm that cross connections do not exist in newly constructed and redeveloped areas. Prohibiting cross-connections can help reduce pollution from sanitary sewer systems.



**Table 2: Pollutant Reduction Analysis**

MCM	BMP	Information Used	QTY	Units	Does BMP Demonstrate a Direct Reduction in Pollutants (Answer Yes or No and explain)
2. Illicit Discharge Detection and Elimination	BMP 4.2.3 Investigate and Prevent Sanitary Sewer Overflows	Inspection checklist	506	Inspections (SPCC, Wastewater, Lift Station, and Grease traps)	Yes. By inspecting areas on campus that have the potential to pollute stormwater runoff, staff can identify potential issues and prevent illicit discharges from sanitary sewer, oil storage areas, or other locations where SSOs can occur. Additionally, by regularly maintaining grease traps, grit traps, and oil/water separators, SSOs are less likely to occur, which can help decrease the potential for stormwater pollution.
		Maintenance activities	74,850	Gallons (Grease traps and oil/water separator)	
	BMP 4.2.4 Storm Sewer Mapping	GIS Maps	2	Updated maps with stormwater infrastructure information (e.g. inlets, manholes, stormwater piping, outfalls, and BMPs).	No. This BMP does not result in direct reduction of pollutants; however, it does provide a resource to program managers for tracking illicit discharges or other issues.

**Table 2: Pollutant Reduction Analysis**

MCM	BMP	Information Used	QTY	Units	Does BMP Demonstrate a Direct Reduction in Pollutants (Answer Yes or No and explain)
2. Illicit Discharge Detection and Elimination	BMP 4.2.5 Illicit Discharge Detection and Elimination Program	Administrative document	1	Internal guidance document (IDDE Program)	No. This BMP does not result in direct reduction of pollutants; however, it does provide a set of procedures for program managers to use when responding to and tracking illicit discharges.
	BMP 4.2.6 Training on Illicit Discharge Detection, Reporting, and Response	Training materials	315	PowerPoint Training Slides	No. This BMP does not result in direct reduction of pollutants; however, it does educate target audiences on eliminating and reporting illicit discharges.
	BMP 4.2.7 IDDE Hotline and Follow-Up Procedures	Reported illicit discharges	10	Illicit discharge reports	Yes. When illicit discharges or spills are reported, staff can immediately respond and implement BMPs to prevent the discharge from entering the MS4 or mitigate any potential harm to the environment.
	BMP 4.2.8 Hazardous Waste and Recycling Material Collection Programs	Documented disposal volumes	640,801 lbs	Pounds of properly disposed materials (e.g. recycling, hazardous waste, and universal waste)	Yes. By providing an avenue for the campus community to properly dispose of materials, illegal dumping is prevented.

**Table 2: Pollutant Reduction Analysis**

MCM	BMP	Information Used	QTY	Units	Does BMP Demonstrate a Direct Reduction in Pollutants (Answer Yes or No and explain)
3. Construction Site Stormwater Runoff Control	BMP 5.2.1 Campus Stormwater Management UPPS 04.05.16	Administrative document	1	Internal policy	No. This BMP does not result in direct reduction of pollutants; however, it does outline requirements for conducting soil-disturbing activities on campus.
	BMP 5.2.2 MS4 Compliance Plan for Construction Activities	Administrative document	1	Internal guidance document (MS4 Compliance Plan for Construction Activities)	No. This BMP does not result in direct reduction of pollutants; however, it does provide a set of procedures for program managers to use when monitoring compliance with stormwater regulations on construction sites.
	BMP 5.2.3 MS4 Compliance Inspections	Construction stormwater compliance checklist	14	MS4 Compliance Inspections	Yes. Inspecting construction sites allows inspectors to assess BMP appropriateness and address potential issues on-site for pollution prevention.

**Table 2: Pollutant Reduction Analysis**

MCM	BMP	Information Used	QTY	Units	Does BMP Demonstrate a Direct Reduction in Pollutants (Answer Yes or No and explain)
4. Post-Construction Stormwater Management in Development and Redevelopment	BMP 6.2.1 Campus Stormwater Management UPPS 04.05.16	Administrative document	1	Internal policy	No. This BMP does not result in direct reduction of pollutants; however, it does outline requirements for maintaining structural BMPs on campus.
	BMP 6.2.2 Post-Construction Stormwater Management Program	Administrative document	2	Internal guidance document (MS4 Compliance Plan for Construction Activities and BMP Maintenance Manual)	No. This BMP does not result in direct reduction of pollutants; however, it does provide a set of procedures for program managers to use when BMPs are being selected and when maintenance/inspections are needed.
	BMP 6.2.3 Inventory of Structural BMPs	Inventory list of structural BMPs	1	New BMPs added	No. This BMP does not result in direct reduction of pollutants; however, it does provide information on structural BMPs designed to treat stormwater runoff.
	BMP 6.2.4 Post-Construction BMP Design Review	Post-construction stormwater compliance checklist	4	Review of construction plans with proposed structural BMPs	No. This BMP does not result in direct reduction of pollutants, however, selection of appropriate BMPs will allow for reduction in pollution over time.

**Table 2: Pollutant Reduction Analysis**

MCM	BMP	Information Used	QTY	Units	Does BMP Demonstrate a Direct Reduction in Pollutants (Answer Yes or No and explain)
4. Post-Construction Stormwater Management in Development and Redevelopment	BMP 6.2.5 Inspection Program for Structural BMPs	Inspection Records	35	Inspections	Yes. By inspecting structural BMPs, pollutants can be identified and removed as a result of the inspection.
	BMP 6.2.6 Operation and Maintenance of Structural BMPs	Maintenance records	143,924 lbs	Volume of materials removed during maintenance	Yes. By properly maintaining structural BMPs, pollutants are removed and not discharged into the MS4.
5. Pollution Prevention Good Housekeeping for Municipal Operations	BMP 7.2.1 Operation and Maintenance Program for Good Housekeeping and Pollution Prevention Activities	Administrative document	1	Internal guidance document (O&M for good housekeeping/pollution prevention)	Yes. While this BMP provides a set of procedures for program managers to use for monitoring compliance, departments also develop Standard Operating Procedures for facilities and conduct inspections for pollution prevention activities, potential pollutants or activities can be identified in the SOP and removed or modified as a result of the inspection.

**Table 2: Pollutant Reduction Analysis**

MCM	BMP	Information Used	QTY	Units	Does BMP Demonstrate a Direct Reduction in Pollutants (Answer Yes or No and explain)
5. Pollution Prevention Good Housekeeping for Municipal Operations	BMP 7.2.1 Operation and Maintenance Program for Good Housekeeping and Pollution Prevention Activities	Standard Operating Procedure	8	Document	Yes. While this BMP provides a set of procedures for program managers to use for monitoring compliance, departments also develop Standard Operating Procedures for facilities and conduct inspections for pollution prevention activities, potential pollutants or activities can be identified in the SOP and removed or modified as a result of the inspection.
		Inspection checklist records	61	Total number of inspections	
	BMP 7.2.2 Inventory of Permittee-Owned Facilities	Permittee-Owned Inventory	1 removed 4 added	Total number of buildings added or removed from inventory	No. This BMP does not result in direct reduction of pollutants.
BMP 7.2.3 Employee Training Program	Online training database	273	Training records	No. This BMP does not result in direct reduction of pollutants; however, it does educate target audiences on pollution prevention practices.	

**Table 2: Pollutant Reduction Analysis**

MCM	BMP	Information Used	QTY	Units	Does BMP Demonstrate a Direct Reduction in Pollutants (Answer Yes or No and explain)
5. Pollution Prevention Good Housekeeping for Municipal Operations	BMP 7.2.3 Employee Training Program	Training for GH/PP	311	Totals numbers of online GH/PP training of staff.	No. This BMP does not result in direct reduction of pollutants; however, it does educate target audiences on spill mitigation and pollution prevention practices.
		Training for SPCC	254	Totals numbers of online SPCC training of staff.	
	BMP 7.2.4 Oil Recycling Program	Manifests	1110	Gallons recycled	Yes. By providing an avenue for the campus community to properly dispose of used oil, illegal dumping can be prevented.
	BMP 7.2.5 Characterize BMP Wastes for Disposal	Waste sampling results	1	Sample analysis results	No. This BMP does not result in direct reduction of pollutants; however, it does indirectly reduce pollution in the system.
	BMP 7.2.6 Campus Standards for Turf Management	Licensed applicator records	8	Records of training and certification	No. This BMP does not result in direct reduction of pollutants.

**Table 2: Pollutant Reduction Analysis**

MCM	BMP	Information Used	QTY	Units	Does BMP Demonstrate a Direct Reduction in Pollutants (Answer Yes or No and explain)
5. Pollution Prevention Good Housekeeping for Municipal Operations	BMP 7.2.7 Contractor Oversight	University policy	1	Internal policy contractors must adhere to	Yes, while this BMP describes the policy for contractors to adhere to, it also addresses inspecting contractor activities to assess BMP appropriateness and address potential issues on-site for pollution prevention.
		Inspection Records	14	Inspections	





4. Provide the measurable goals for each of the MCMs, and an evaluation of the success of the implementation of the measurable goals:

<b>Table 3: Measurable Goals Status</b>		
<b>MCM(s)</b>	<b>Measurable Goal(s)</b>	<b>Explain progress toward goal</b>
1. Public Education, Outreach and Involvement	Conduct an annual review of the Comprehensive Stormwater Education and Outreach Program. Update as necessary.	Met goal.  No updates needed.
	Seek new and updated stormwater educational materials from EPA, TCEQ and other MS4s. Customize materials with local logos and contact information.	Met goal.  No new materials developed or adapted.
	Distribute educational and promotional materials at university and city sponsored environmental events or other appropriate activities.	Met goal.  Distributed 13,637 educational handouts and promotional items.
	Post or broadcast digital promotional materials onto free media outputs, social media and various websites and list serves as appropriate.	Met goal.  Continued promotion of stormwater awareness materials through social media, Texas State Cable TV, campus-wide emails, and website postings.
	Include training materials in the Comprehensive Education & Outreach Program.	Met goal.  No new materials developed or adapted, therefore no program updates needed.

**Table 3: Measurable Goals Status**

MCM(s)	Measurable Goal(s)	Explain progress toward goal
1. Public Education, Outreach and Involvement	Annually review training materials and update as necessary	Met goal.  Located training materials for annual construction staff training.
	Provide annual training for Texas State construction staff.	Met goal.  Trained 8 Texas State construction department staff members.
	Provide orientation training to contractor and subcontractor superintendents on basic SWPPP inspection expectations and site controls upon initial startup at jobsite.	Met Goal.  427 contractors/subcontractors were trained on basic SWPPP expectations for construction site stormwater management.
	Describe training methods and materials in the Comprehensive Education & Outreach Program. Review annually and update as necessary.	Met goal.  No new materials developed or adapted, therefore no program updates needed.
	Provide basic stormwater pollution prevention awareness information for new employees and new students.	Met Goal.  Provided stormwater awareness training to new employees (288).  Provided stormwater awareness to new students (4274) as part of University Seminar class required for incoming freshmen.

**Table 3: Measurable Goals Status**

MCM(s)	Measurable Goal(s)	Explain progress toward goal
1. Public Education, Outreach and Involvement	Include pollution prevention and MS4 permit awareness messages in regularly published media.	Met goal.  Distributed stormwater educational messages via outreach events, campus-wide emails, mail-outs, and social media postings. Provided approximately 154,185 education and outreach messages.
	Implement aquatic pet and pet waste awareness campaign.	Goal not met due to force majeure caused by COVID-19 restrictions.  Education and outreach for on-campus residence halls regarding proper disposal of aquatic animals was not provided to students due to emergency move-out in Spring 2020.
	Maintain and update the University webpage to include updated stormwater educational materials, contact information, hotline numbers, annual reports, and other appropriate materials.	Met goal.  Continued to add stormwater awareness information to the webpage <a href="http://www.txstate.edu/stormwater">www.txstate.edu/stormwater</a> . The Texas State Stormwater Website provides information about volunteer opportunities, links to the SWMP and Annual Reports, and a link to report illicit discharges online or through a hotline number.
	Comply with Public Notice legal requirements for NOI and SWMP implementation.	Goal not met. SWMP not yet technically reviewed or approved by TCEQ.  Goal extended to Year 3.

**Table 3: Measurable Goals Status**

MCM(s)	Measurable Goal(s)	Explain progress toward goal
1. Public Education, Outreach and Involvement	Publish the 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.	Goal not met. SWMP not yet technically reviewed or approved by TCEQ.  Goal extended to Year 3.
	Create Advisory Committee	Met goal.  Committee (16 representatives) created during Year 1.
	Hold annual meeting to discuss SWMP and the implementation of the selected BMPS.	Met goal.  Committee held annual meeting in Year 2 (16 attendees).
	Review annual event opportunities.	Met goal.
	Participate in a minimum of 5 events annually.	Met goal.  The Stormwater Management Program participated in six (6) public education, outreach and involvement events: <ul style="list-style-type: none"> <li>• Texas State Employee Wellness Fair</li> <li>• Texas State Support Staff Resource Fair</li> <li>• Fall Sweep</li> <li>• STEAM Fair</li> <li>• 35<sup>th</sup> Annual Great Texas River Cleanup</li> <li>• Storm Drain Marking Event</li> </ul>

**Table 3: Measurable Goals Status**

MCM(s)	Measurable Goal(s)	Explain progress toward goal
1. Public Education, Outreach and Involvement	Install a minimum of 25 inlet markers and storm drains in new construction or remodeled areas of campus.	<p>Goal not met due to force majeure caused by COVID-19 restrictions.</p> <p>Annual storm drain marking event was rescheduled due to COVID-19. Make-up event was held in August 2020 and 15 inlet markers were installed.</p>
	Prioritize work with Texas State volunteer groups.	Met goal.
2. Illicit Discharge Detection and Elimination (IDDE)	Conduct an annual review of the UPPS and associated internal reference documents for consistency with the regulations and policies. Update as necessary.	<p>Met goal.</p> <p>Updated in August 2019, no updates needed during Year 2.</p>
	Include policy in contracts, as applicable.	<p>Met goal.</p> <p>Compliance with UPPS 04.05.16 is included in contracts.</p>
	Review construction designs and specifications to verify that illicit connections do not exist between storm and sanitary sewers.	<p>Met goal.</p> <p>Conducted nineteen (19) plan reviews and included prohibition of cross-connections in comments.</p>

**Table 3: Measurable Goals Status**

MCM(s)	Measurable Goal(s)	Explain progress toward goal
2. Illicit Discharge Detection and Elimination (IDDE)	Field verify construction as-built to confirm no cross connections exist.	Met goal.  Field verification of no cross-connections performed prior to building acceptance on three (3) projects.
	Include policy in contracts, as applicable.	Met goal.  Compliance with UPPS 04.05.16 is included in contracts.
	Investigate and respond to SSOs that result in an illicit discharge, document corrective action.	Met goal.  Zero (0) SSOs occurred that resulted in an illicit discharge.  Smoke test on sanitary sewer system performed during Year 2 to identify system defects or cross-connections with storm sewer. Identified two (2) possible areas where storm and sanitary are cross connected. Repairs will be addressed during Year 3.
	Investigate grease traps for maintenance needs, make repairs as necessary.	Met goal.  127 grease traps inspected, 0 pumped out, and 3 repaired.  27 lift stations inspected, 1 pumped out, 4 repaired.  228 sanitary sewer manhole covers were inspected, 0 were replaced.  Eleven (11) compactors were inspected daily over 49 weeks, totaling 2,695 inspections. Staff responded to and resolved 6 incidents during Year 2.

**Table 3: Measurable Goals Status**

MCM(s)	Measurable Goal(s)	Explain progress toward goal
2. Illicit Discharge Detection and Elimination (IDDE)	Conduct monthly inspections of grease traps, food oil storage units, and drum storage areas in conformance with the SPCC Plan.	Met goal.  Routine SPCC inspections (324) performed for compliance with SPCC Plan.
	Conduct semiannual sampling of wastewater ports in accordance with the Industrial Pretreatment Permit	Met goal.  Semi-annual wastewater inspections (28) performed for compliance with Industrial Pretreatment Permit.
	Continue with regular servicing of grease traps, grit traps, and oil/water separators.	Met goal.  Grit trap and oil/water separator waste: 2,800 gallons Grease trap waste: 72,050 gallons
	Continue to update the MS4 map showing new outfalls and modified or new storm sewer lines and inlets.	Met goal.  MS4 Outfall Map was updated in Year 2 to include one new outfall (Lindsey Street Parking Lot), 1,020 feet of storm sewer piping, and two new storm drains.
	Annually review project closeout documents received by contractors to ensure they provide GIS compatible as-built's of the storm and sanitary sewer systems.	Met goal.  "As-Built's" were provided to GIS Technician for storm line additions and inlet additions.



**Table 3: Measurable Goals Status**

MCM(s)	Measurable Goal(s)	Explain progress toward goal
2. Illicit Discharge Detection and Elimination (IDDE)	Conduct an annual review of the IDDE Program. Update as necessary.	<p>Met goal.</p> <p>Reviewed and began making updates on 5/29/2020 to internal procedures for IDDE response. Updates will continue into Year 3.</p>
	Investigate and respond to spills that may result in an illicit discharge within the MS4.	<p>Met goal.</p> <p>Ten (10) spills and illicit discharges were reported, investigated, and resolved in Year 2.</p>
	Conduct visual observations of 20% of MS4 outfalls annually.	<p>Met goal.</p> <p>Conducted visual inspections of eighteen (18) MS4 outfalls.</p>
	Continue to provide training to staff on illicit discharge detection and reporting. Review training and update as necessary.	<p>Met goal.</p> <p>315 employees completed Illicit Discharge, Detection and Elimination annual training using SAP software system.</p>
	Continue to provide technical training for staff tasked spill and illicit discharge response, inspections, and outfall monitoring.	<p>Goal not met due to force majeure caused by COVID-19 restrictions.</p> <p>Annual OSHA Refresher for 40-Hour HAZWOPER was rescheduled due to COVID.</p>

**Table 3: Measurable Goals Status**

MCM(s)	Measurable Goal(s)	Explain progress toward goal
2. Illicit Discharge Detection and Elimination (IDDE)	<p>Maintain the hotline number for the public to report illicit discharge or illegal dumping. Continue publicizing the hotline number to the campus community.</p>	<p>Met goal.</p> <p>Hotline number (512-245-IDDE) is still active for use by campus community.</p>
	<p>Document the types of complaints and corrective actions taken for the annual report.</p>	<p>Met goal.</p> <p>Ten (10) spills and illicit discharges were reported, investigated, and resolved in Year 2.</p>
	<p>Collect hazardous waste and industrial waste, document volumes of waste removed.</p>	<p>Met goal.</p> <p>48 weekly pickups of hazardous and non-hazardous waste were conducted.</p>
	<p>Collect batteries, mercury-containing lamps, ink jet cartridges, and paint waste.</p>	<p>Met goal.</p> <p>Monthly pickups of alkaline and rechargeable batteries were conducted.</p>
	<p>Collect single-stream recycling of aluminum, plastic, glass, paper and cardboard from all buildings.</p>	<p>Met goal.</p> <p>Continued oil recycling (four pickups) as needed, as well as daily, weekly, bi-weekly, monthly, and as needed pickups of recyclable materials (cardboard, paper, and mixed stream) over 49 weeks.</p>

**Table 3: Measurable Goals Status**

MCM(s)	Measurable Goal(s)	Explain progress toward goal
2. Illicit Discharge Detection and Elimination (IDDE)	Document volume of wastes disposed of or recycled annually.	<p>Met goal.</p> <p>Picked up and disposed of 24.3 tons of hazardous and non-hazardous waste through weekly pickups. Recycled over 292 tons of recyclable materials (cardboard, plastics, and mixed stream) through weekly pickups and self-serve drop off. Recycled 1,110 gallons of used oil. Recycled a total of 3,309 pounds of alkaline, lead acid, and rechargeable batteries.</p>
3. Construction Site Stormwater Runoff Control	Conduct an annual review of the UPPS and associated internal reference documents for consistency with the regulations and policies. Update as necessary.	<p>Met goal.</p> <p>Updated in August 2019, no updates needed during Year 2.</p>
	Revise existing checklists to follow for plan review.	<p>Met goal.</p> <p>Checklist revised and included as appendix in the MS4 Compliance Plan for Construction Activities.</p>
	Continue with the process of reviewing drawings/specifications/ sediment & erosion control plans, SWPPP plans and drawings, and post-construction BMP selection on new construction and redevelopment.	<p>Met goal.</p> <p>Reviewed nineteen (19) of erosion control plans, SWPPP drawings and post-construction BMP selection, for projects one acre or larger in size. Reviewed one (1) SWPPP.</p>

**Table 3: Measurable Goals Status**

MCM(s)	Measurable Goal(s)	Explain progress toward goal
3. Construction Site Stormwater Runoff Control	Conduct an annual review of the MS4 Compliance Plan. Update as necessary and incorporate changes into Texas State Construction Standard supporting documentation.	Met goal.  MS4 Compliance Plan for Construction Activities was updated and accepted in August 2020.
	Perform MS4 Compliance Inspections on active construction sites and document inspection findings.	Met goal.  Conducted fourteen (14) MS4 Inspections on active construction sites permitted under the TXR150000.
	Continue attending conferences and training to increase skills and knowledge of construction inspectors.	Met goal.  Workshops attended – 1 Total professional development hours – 65 Total number of attendees – 13
	Resolve all noncompliance issues or pursue enforcement actions per UPPS.	Met goal.
4. Post-Construction Stormwater Management in New Development and Redevelopment	Conduct an annual review of the UPPS and associated internal reference documents for consistency with the regulations and policies. Update as necessary.	Met goal.  Updated in August 2019, no updates needed during Year 2.

**Table 3: Measurable Goals Status**

MCM(s)	Measurable Goal(s)	Explain progress toward goal
4. Post-Construction Stormwater Management in New Development and Redevelopment	Conduct an annual review of the Post-Construction Stormwater Management Program. Update as necessary.	Met goal.  Plan Review SOP reviewed and updated to incorporate Post-Construction BMP selection.
	Update the table and map as new BMPs are added or discovered.	Met goal.  One new structural BMP added during Year 2.
	Maintain list of owners/operators (responsible departments) for BMP maintenance.	Met goal.
	Revise existing checklists to follow for plan review.	Met goal.  Checklist revised and included as appendix in the MS4 Compliance Plan for Construction Activities.
	Continue with the process of reviewing drawings/specifications/sediment & erosion control plans, SWPPP plans and drawings, and post-construction BMP selection on new construction and redevelopment.	Met goal.  Reviewed nineteen (19) of erosion control plans, SWPPP drawings and post-construction BMP selection, for projects one acre or larger in size. Reviewed four (4) post-construction structural BMP plans.

**Table 3: Measurable Goals Status**

MCM(s)	Measurable Goal(s)	Explain progress toward goal
4. Post-Construction Stormwater Management in New Development and Redevelopment	Maintain templates of structural BMP inspection forms and update as necessary. Include references and any special instructions for the inspectors.	Met goal.
	Update and maintain BMP fact sheets and use to train inspectors as needed.	Met goal.
	Ensure inspections are performed to assess BMP functionality and maintenance needs.	Met goal.  Thirty-five (35) structural BMP inspections conducted.
	Request operation and maintenance plans for structural BMPs upon completion of construction project.	Met goal. No O&M plans acquired.
	Require responsible departments to perform O&M on structural BMPs based on O&M recommendations, inspection results, or both.	Met goal.  143,924 pounds of material was removed during BMP maintenance.

**Table 3: Measurable Goals Status**

MCM(s)	Measurable Goal(s)	Explain progress toward goal
5. Pollution Prevention/Good Housekeeping for Municipal Operations	Conduct an annual review of the Operation and Maintenance Program for Good Housekeeping and Pollution Prevention Activities. Update as necessary.	Met goal.  MS4 Compliance Plan for Construction Activities was updated and accepted in March 2020.
	Develop site-specific Standard Operating Procedures at each facility for Pollution Prevention and Good Housekeeping activities.	Met goal.  Departments developed eight (8) site-specific Standard Operating Procedures for Pollution Prevention and Good Housekeeping activities for their respective facilities.
	Review inventory list annually, updated as necessary.	Met goal.  1 building removed and 4 buildings added to inventory.
	Continue to provide annual training for staff on good housekeeping/pollution prevention activities.	Met Goal.  311 employees completed Good Housekeeping and Pollution Prevention annual training using SAP software system.
	Continue to provide annual training for staff on the SPCC Program.	Met Goal.  254 employees completed Spill Prevention, Control and Countermeasures annual training using SAP software system.

**Table 3: Measurable Goals Status**

MCM(s)	Measurable Goal(s)	Explain progress toward goal
5. Pollution Prevention/Good Housekeeping for Municipal Operations	Continue utilizing services for used oil recycling.	Met goal.  Recycled 1,110 gallons of used oil in four (4) pickups.
	As necessary, update the campus Waste Analysis Plan to include additional waste streams, procedures for characterization, and disposal procedures.	Met goal.  Updates to the Waste Analysis Plan began in Year 2 and will continue in Year 3. Update included removal of all Industrial Class waste codes from non-hazardous wastes and updated waste profiles and waste determination sheets accordingly.
	As necessary, collect samples of wastes from campus BMPs for waste characterization.	Met goal.  One (1) sample collected for BMP maintenance.
	Document sampling results and volumes of waste removed annually.	Met goal.  82,899 pounds of waste removed from sampled BMPs.
	Review Campus Standards for Turf Management and update as necessary.	Met goal.  No updates.
	Continue encouraging licensed applicator training and retain records of licensed applicators on campus.	Eight (8) employees renewed their Pesticide Applicator Licenses.



**Table 3: Measurable Goals Status**

<b>MCM(s)</b>	<b>Measurable Goal(s)</b>	<b>Explain progress toward goal</b>
	Continue to provide contractor oversight through spot check or complaint-based inspections to ensure that good housekeeping and pollution prevention BMPs are implemented.	Met Goal.  Inspected fourteen (14) construction sites for MS4 compliance.

### **C. Stormwater Monitoring Data (Part IV Section B.2.(b))**

1. Provide a summary of all information used including any lab results (if sampling was conducted) to assess the success of the SWMP at reducing the discharge of pollutants to the MEP. For example, did the MS4 conduct visual inspections, clean the inlets, look for illicit discharge, clean streets, look for flow during dry weather, etc.? *(Refer to the MS4 General Permit TXR040000 Part IV Section B.2.(b))*

**Sampling not required for Level 2 MS4s. No TMDL for TDS impairment on Segment 1814 Upper San Marcos River.** Ongoing monitoring activities conducted are as follows:

- MS4 Compliance Inspections conducted for five (5) active construction sites during Year 2, totaling fourteen (14) inspections. SWPPP inspections were conducted by third party contractors for the primary operator to ensure compliance with Construction General Permit TXR150000 by minimizing pollutants from construction activity from entering the MS4.
- Inspections were conducted (18) for MS4 outfalls and maintenance needs. Evidence of illicit discharges was not detected during inspections. Utilities Operations performed maintenance on campus outfalls, removing nearly 5,000 pounds of material from the MS4.
- Annual inspections (35) on structural BMPs were performed during Year 2 to determine functionality and maintenance needs. Maintenance activities were initiated based on inspection findings and O&M recommendations. The effectiveness of these BMPs was addressed and actions were taken to improve their functionality. The BMP inventory spreadsheet was updated to identify BMPs which are no longer effective or were currently out of order. Approximately 143,924 pounds of material was removed from structural BMPs throughout Year 2.
- Ten (10) reports of illicit discharges were reported during Year 2. Each incident was responded to and resolved the same day or as soon as possible, removing or preventing harmful pollutants from entering the storm sewer system.
- Utilities Operations performed maintenance on campus storm drains, removing nearly 3,500 pounds of material from the MS4.

### **D. Impaired Waterbodies (Part IV Section B.2.(c))**

1. If applicable, explain below or attach a summary of any activities taken to address the discharge to impaired waterbodies, including any sampling results and a summary of the small MS4's BMPs used to address the pollutant of concern *(Refer to MS4 General Permit TXR040000 Part IV Section B.2.(c))*:

**The 2016 Draft Texas Integrated Report – Texas 303(d) List no longer lists the Upper San Marcos River, segment 1814, as impaired. It was previously listed for Total Dissolved Solids (TDS) concentrations but has since been removed from the list.**

2. Describe the implementation of targeted controls if the small MS4 discharges to an impaired water

body with an approved TMDL (*Refer to the MS4 General Permit TXR040000; Part II Section D.4.(a)*):

**Not Applicable, due to no TMDL in segment 1814**

3. Report the benchmark identified by the MS4 and assessment activities (*Refer to the MS4 General Permit TXR040000; Part II Section D.4.(a)(6)*):

**Not Applicable, due to no TMDL in segment 1814**

4. Provide an analysis of how the selected BMPs will be effective in contributing to achieving the benchmark (*Refer to the MS4 General Permit TXR040000; Part II Section D.4.(a)(4)*):

**Not Applicable, due to no TMDL in segment 1814**

5. If applicable, report on focused BMPs to address impairment for bacteria (*Refer to the MS4 General Permit TXR040000; Part II Section D.4.(a)(5)*):

**Not Applicable, due to no TMDL in segment 1814**

6. Assess the progress to determine BMP's effectiveness in achieving the benchmark (*Refer to the MS4 General Permit TXR040000; Part II.D.4.(a)(6)*):

**Not Applicable, due to no TMDL in segment 1814**

**E. Stormwater Activities (Part IV Section B.2.(d))**

Describe any stormwater activities the MS4 operator has planned for the next reporting year. Use the table or attach a summary, as appropriate:

**The goal and BMP language listed below has been submitted to TCEQ for approval. Language may vary once the SWMP is approved.**

<b>Table 4</b>			
<b>MCM(s)</b>	<b>BMP</b>	<b>Stormwater Activity</b>	<b>Description/Comments</b>
1. Public Education, Outreach and Involvement	Comprehensive Stormwater Education and Outreach Program	Conduct an annual review of the Comprehensive Stormwater Education and Outreach Program. Update as necessary.	Continuation from Year 2.
	Stormwater Quality Education Materials	Seek new and updated stormwater educational materials from EPA, TCEQ and other MS4s. Customize materials with local logos and contact information.	Continuation from Year 2.
		Distribute educational and promotional materials at university and city sponsored environmental events or other appropriate activities.	Continuation from Year 2.
		Post or broadcast digital promotional materials onto free media outputs, social media and various websites and list serves as appropriate.	Continuation from Year 2.
		Include training materials in the Comprehensive Education & Outreach Program.	Continuation from Year 2.

**Table 4**

MCM(s)	BMP	Stormwater Activity	Description/Comments
1. Public Education, Outreach and Involvement	Education/Training for Construction Personnel	Annually review training materials and update as necessary annually.	Continuation from Year 2.
		Provide annual training for Texas State construction staff.	Continuation from Year 2.
		Provide orientation training to contractor and subcontractor superintendents on basic SWPPP inspection expectations and site controls upon initial startup at a jobsite.	Continuation from Year 2.
		Describe training methods and materials in the Comprehensive Education & Outreach Program. Review annually and update as necessary.	Continuation from Year 2.
	Education and Outreach for Pollution Prevention	Provide basic stormwater pollution prevention awareness information for new employees and new students.	Continuation from Year 2.
		Include pollution prevention and MS4 permit awareness messages in regularly published media.	Continuation from Year 2.
		Implement aquatic pet and pet waste awareness campaign.	Continuation from Year 2.

**Table 4**

MCM(s)	BMP	Stormwater Activity	Description/Comments
1. Public Education, Outreach and Involvement	Web Page and Community Hotlines	Maintain and update the University webpage to include updated stormwater educational materials, contact information, hotline numbers, annual reports, and other appropriate materials.	Continuation from Year 2.
	Public Notice Requirements	Comply with Public Notice legal requirements for NOI and SWMP implementation.	New goal for new permit cycle. Extending goal deadline to Year 3 (dependent on SWMP approval).
		Publish the 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.	New goal for new permit cycle. Extending goal deadline to Year 3 (dependent on SWMP approval).
	Advisory Committee	Hold annual meeting to discuss SWMP and the implementation of the selected BMPS.	Continuation from Year 2.
	Public Involvement and Outreach Events Community Events	Review annual event opportunities.	Continuation from Year 2.
		Participate in a minimum of 5 events annually.	Continuation from Year 2.
		Install a minimum of 25 inlet markers and storm drains in new construction or remodeled areas of campus.	Continuation from Year 2.
		Prioritize work with Texas State volunteer groups.	Continuation from Year 2.

**Table 4**

MCM(s)	BMP	Stormwater Activity	Description/Comments
2. Illicit Discharge, Detection and Elimination	Campus Stormwater Management UPPS 04.05.16	Conduct an annual review of the UPPS and associated internal reference documents for consistency with the regulations and policies. Update as necessary.	Continuation from Year 2.
		Include policy in subcontracts as applicable	Continuation from Year 2.
	Prevention of Illicit Connections between Storm and Sanitary Sewers	Review construction designs and specifications to verify that illicit connections do not exist between storm and sanitary sewers.	Continuation from Year 2.
		Field verify construction as-built to confirm no cross connections exist.	Continuation from Year 2.
		Include policy in contracts, as applicable.	Continuation from Year 2.
	Investigate and Prevent Sanitary Sewer Overflows	Investigate and respond to SSOs that result in an illicit discharge, document corrective action.	Continuation from Year 2.
		Investigate grease traps for maintenance needs, make repairs as necessary.	Continuation from Year 2.
		Conduct monthly inspections of grease traps, food oil storage units, and drum storage areas in conformance with the SPCC Plan.	Continuation from Year 2.

**Table 4**

MCM(s)	BMP	Stormwater Activity	Description/Comments
2. Illicit Discharge, Detection and Elimination	Investigate and Prevent Sanitary Sewer Overflows	Conduct semiannual sampling of wastewater ports in accordance with the Industrial Pretreatment Permit.	Continuation from Year 2.
		Continue with regular servicing of grease traps, grit traps, and oil/water separators.	Continuation from Year 2.
	Storm Sewer Mapping	Continue to update the MS4 map showing new outfalls and modified or new storm sewer lines and inlets.	Continuation from Year 2.
		Annually review project closeout documents received by contractors to ensure they provide GIS compatible as-builts of the storm sewer and sanitary sewer systems.	Continuation from Year 2.
	Illicit Discharge Detection and Elimination Program	Conduct an annual review of the IDDE Program. Update as necessary.	Continuation from Year 2.
		Investigate and respond to spills that may result in an illicit discharge within the MS4.	Continuation from Year 2.
		Conduct visual observations of 20% of MS4 outfalls annually.	Continuation from Year 2.



**Table 4**

MCM(s)	BMP	Stormwater Activity	Description/Comments
2. Illicit Discharge, Detection and Elimination	Training on Illicit Discharge Detection, Reporting, and Response	Continue to provide training to staff on illicit discharge detection and reporting. Review training and update as necessary.	Continuation from Year 2.
		Continue to provide technical training for staff tasked spill and illicit discharge response, inspections, and outfall monitoring.	Continuation from Year 2.
	IDDE Hotline Number and Follow-Up Procedures	Maintain the hotline number for the public to report illicit discharge or illegal dumping. Continue publicizing the hotline number to the campus community.	Continuation from Year 2.
		Document the types of complaints and corrective actions taken for the annual report.	Continuation from Year 2.
	Hazardous Waste and Recycle Material Collection Programs	Collect hazardous waste and industrial waste, document volumes of waste removed.	Continuation from Year 2.
		Collect batteries, mercury-containing lamps, ink jet cartridges, and paint waste.	Continuation from Year 2.
		Collect single-stream recycling of aluminum, plastic, glass, paper and cardboard from all buildings.	Continuation from Year 2.
		Document volume of wastes disposed of or recycled annually.	Continuation from Year 2.

**Table 4**

MCM(s)	BMP	Stormwater Activity	Description/Comments
3. Construction Site Stormwater Runoff Control	Campus Stormwater Management UPPS 04.05.16	Conduct an annual review of the UPPS and associated internal reference documents for consistency with the regulations and policies. Update as necessary.	Continuation from Year 2.
	MS4 Compliance Plan for Construction Activities	Revise existing checklists to follow for plan review.	Continuation from Year 2.
		Continue with the process of reviewing drawings/specifications /sediment & erosion control plans, SWPPP plans and drawings, and post-construction BMP selection on new construction and redevelopment.	Continuation from Year 2.
		Conduct an annual review of the MS4 Compliance Plan. Update as necessary and incorporate changes into Texas State Construction Standard supporting documentation.	Continuation from Year 2.
	MS4 Compliance Inspections	Perform MS4 Compliance Inspections on active construction sites and document inspection findings.	Continuation from Year 2.
		Continue attending conferences and training to increase skills and knowledge of construction inspectors.	Continuation from Year 2.
		Resolve all noncompliance issues or pursue enforcement actions per UPPS.	Continuation from Year 2.

**Table 4**

MCM(s)	BMP	Stormwater Activity	Description/Comments
3. Construction Site Stormwater Runoff Control	Education/Training for Construction Personnel	See Table 3 - 1 Public Education, Outreach and Involvement	Continuation from Year 2.
	Stormwater Hotline for Construction Runoff Issues	See Table 3 - 1 Public Education, Outreach and Involvement	Continuation from Year 2.
4. Post - Construction Stormwater Management in New Development and Redevelopment	Campus Stormwater Management UPPS 04.05.16	Conduct an annual review of the UPPS and associated internal reference documents for consistency with the regulations and policies. Update as necessary.	Continuation from Year 2.
	Post-Construction Stormwater Management Program	Conduct an annual review of the Post-Construction Stormwater Management Program. Update as necessary.	Continuation from Year 2.
	Inventory of Structural BMPs	Update the table and map as new BMPs are added or discovered.	Continuation from Year 2.
		Maintain list of owners/operators (responsible departments) for BMP maintenance.	Continuation from Year 2.

**Table 4**

MCM(s)	BMP	Stormwater Activity	Description/Comments
4. Post - Construction Stormwater Management in New Development and Redevelopment	Post-Construction BMP Design Review	Continue with the process of reviewing drawings/specifications /sediment & erosion control plans, SWPPP plans and drawings, and post-construction BMP selection on new construction and redevelopment.	Continuation from Year 2.
	Inspection Program for Structural BMPs	Maintain templates structural BMP inspection forms and update as necessary. Include references and any special instructions for the inspectors.	Continuation from Year 2.
		Update and maintain BMP fact sheets and use to train inspectors as needed.	Continuation from Year 2.
		Ensure inspections are performed to assess BMP functionality and maintenance needs.	Continuation from Year 2.
	Operation and Maintenance of Structural BMPs	Request operation and maintenance plans for structural BMPs upon completion of construction project.	Continuation from Year 2.
		Require responsible departments to perform O&M on structural BMPs based on O&M recommendations, inspection results, or both.	Continuation from Year 2.

**Table 4**

MCM(s)	BMP	Stormwater Activity	Description/Comments
5. Pollution Prevention/ Good Housekeeping for Municipal Operations	Operation and Maintenance Program for Good Housekeeping and Pollution Prevention Activities	Conduct an annual review of the Operation and Maintenance Program for Good Housekeeping and Pollution Prevention Activities. Update as necessary.	Continuation from Year 2.
		Develop site-specific Standard Operating Procedures at each facility for Pollution Prevention and Good Housekeeping activities.	Continuation from Year 2. Extending goal deadline to Year 3.
		Implement site-specific Standard Operating Procedures for each facility.	New goal for Year 3.
		Perform site-specific inspections based on Standard Operating Procedures.	New goal for Year 3.
	Inventory of Permittee-Owned Facilities	Review inventory list annually, updated as necessary.	Continuation from Year 2.
	Employee Training Program	Continue to provide annual training for staff on good housekeeping/pollution prevention activities.	Continuation from Year 2.
		Continue to provide annual training for staff on the SPCC Program.	Continuation from Year 2.

**Table 4**

<b>MCM(s)</b>	<b>BMP</b>	<b>Stormwater Activity</b>	<b>Description/Comments</b>
5. Pollution Prevention/ Good Housekeeping for Municipal Operations	Oil Recycling Program	Continue utilizing services for used oil recycling.	Continuation from Year 2.
	Characterize BMP Waste for Disposal	As necessary, update the campus Waste Analysis Plan to include additional waste streams, procedures for characterization, and disposal procedures.	Continuation from Year 2.
	Characterize BMP Waste for Disposal	As necessary, collect samples of wastes from campus BMPs for waste characterization.	Continuation from Year 2.
		Document sampling results and volumes of waste removed annually.	Continuation from Year 2.
	Campus Standards for Turf Management	Review Campus Standards for Turf Management and update as necessary.	Continuation from Year 2.
		Continue encouraging licensed applicator training and retain records of licensed applicators on campus.	Continuation from Year 2.
	Contractor Oversight	Continue to provide contractor oversight through spot check or complaint-based inspections to ensure that good housekeeping and pollution prevention BMPs are implemented.	Continuation from Year 2.

**F. SWMP Modifications (Part IV Section B.2.(e))**

1. Changes have been made or are proposed to the SWMP since the NOI or the last annual report, including changes in response to TCEQ’s review.

Yes  No

If ‘Yes’, report on changes made to measurable goals and BMPs:

- **Extending goal deadlines on Public Notice (MCM-1) and SOP development (MCM-5)**
- **SWMP not yet technically reviewed and approved by TCEQ**

**G. Additional BMPs (Part IV Section B.2.(f))**

1. Provide a description and schedule for implementation of additional BMPs that may be necessary, based on monitoring results, to ensure compliance with applicable TMDLs and implementation plans.

**Not Applicable, due to no TMDLS**

**H. Additional Information (Part IV Section B.2.(g))**

1. Is the permittee relying on another entity/ies to satisfy some of its permit obligations?

Yes  No

If ‘Yes,’ provide the name(s) of other entity/ies and an explanation of their responsibilities (add more spaces or pages if needed):

Name and Explanation:

**City of San Marcos TXR040485. Texas State University is Coordinating Education, Outreach and Public Participation efforts as appropriate with the City to maximize the program and cost-effectiveness of the required outreach.**

- 2.a. Is the named permittee sharing a SWMP with other entities?

Yes  No

- 2.b. ‘yes,’ is this a system-wide annual report including information for all permittees?

Yes  No

**A system wide annual report is Not Applicable because the City of San Marcos and Texas State University share residents, storm pathways and discharge to the same San Marcos river, but have their own separate MS4 programs.**

**I. Construction Activities (Part IV Section B.2.(h-i))**

1. The number of construction projects in the jurisdiction of the MS4 where the permittee was not the construction site operator (as provided in submittals to the MS4 operator via notices of intent or site notices):

**None**

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

Yes  No

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

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

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



## J. Certification

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

Name (printed): **Wendy McCoy** Title: **Director, Environmental Health, Safety and Risk Management**

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name (printed): \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name (printed): \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name (printed): \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name (printed): \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Note:** If this is this a system-wide annual report including information for all permittees, each permittee shall sign and certify the annual report in accordance with 30 TAC §305.128 (relating to Signatories to Reports).