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): **4**

Annual Reporting Year Option Selected by MS4:

Calendar Year_____

Permit Year_____

Fiscal Year: ___**X**___ Last day of fiscal year: (**August 31, 2022**)

Reporting period beginning date: (month/date/year): **September 1, 2021**

Reporting period end date: (month/date/year): **August 31, 2022**

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**

E-mail Address: **stormwater@txstate.edu**

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.	X		TCEQ routine compliance investigation was conducted on 04/23/2019.
Permittee is currently in compliance with recordkeeping and reporting requirements.	X		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.)	X		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.	X		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.

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	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.
	Education and Outreach for Pollution Prevention	Yes, this BMP is appropriate. Stormwater pollution prevention materials and methods were implemented throughout Year 3 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	Stormwater Awareness for Campus Community	Yes, this BMP is appropriate. The education and outreach messages using the "What Goes Here Flows Here" logo was continued in Year 3 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 4.

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	Stormwater Management Program 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, is 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 thereby, 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		
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	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		
MCM(s)	**BMP**	**BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer yes or no, and explain).**
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 because 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.

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 3.2.1 Comprehensive Stormwater Education and Outreach Program	Administrative document	1	Internal Guidance Document Review	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 Education and Outreach for Pollution Prevention	Stormwater educational post on social media	68 Facebook posts (WGHFH) 62 Instagram posts (WGHFH) 7 Facebook Posts (TXST EHSREM)	What Goes Here Flows Here Social Media Posts	No. This BMP does not result in direct reduction of pollutants; however, it does educate target audiences on pollution prevention practices.
		Educational and promotional materials	2187 (18 events)	Number of promotional and educational materials distributed at events	
		Stormwater educational campus-wide emails	4	Stormwater Education/ Involvement Emails to 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 3.2.3 Education/Training for Construction Personnel	Training materials	1	Internal Document Review	No. This BMP does not result in direct reduction of pollutants; however, it does provide up-to-date education for staff and contractors on pollution prevention practices.
		Training materials (Texas State staff)	22	In-person training and online recorded training	
		Training materials (contractors)	928	Contractors and subcontractor superintendents trained.	
	BMP 3.2.4 Stormwater Awareness for Campus Community	New Student Training	4,319	Students who attended US1100 Meadow Center Boat Tours	No. This BMP does not result in direct reduction of pollutants; however, it does educate target audiences on pollution prevention practices.
		New Employee Training	238	Employees who attended NEW II training	
		Pet/Aquatic Pet Waste Awareness	1	Number of times aquatic pet/pet waste awareness was provided	

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 3.2.5 Web Page and Community Hotlines	Stormwater Management Program	2	Online Documents	No. This BMP does not result in direct reduction of pollutants; however, it does provide the campus community with a direct line of communication for requesting information.
		Stormwater Webpage Concerns and Requests	0	Online Requests via Website	
	BMP 3.2.6 Public Notice Requirements	Public Notice and Affidavit	2	Public Notice and Affidavit	No. This BMP does not result in direct reduction of pollutants; however, it does provide the campus community with the ability to comment on the proposed SWMP.
	BMP 3.2.7 Stormwater Management Program Advisory Committee	FY22 Meeting	13	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.

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	Community events	20	Total Number of Public Outreach Events Attended	No. This BMP does not result in direct reduction of pollutants; however, educating the student population through outreach events and signage discourages students from discharging pollutants to stormwater infrastructure.
		Awareness messages	34	Individual Inlet Markers & Manhole Covers	
2. Illicit Discharge Detection and Elimination	BMP 4.2.1 Campus Stormwater Management UPPS 04.05.16	Administrative document	1	Internal Policy Review	No. This BMP does not result in direct reduction of pollutants; however, it does prohibit illicit discharges and illegal dumping on campus.

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 4.2.2 Prevention of Illicit Connections between Storm and Sanitary Sewers	Plan Reviews	7	Design Reviews	Yes. By conducting plan reviews and field inspection our staff can provide 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.
		Inspection Checklist	17 (Inspections) 0 (Cross-connections)	Field Inspections	

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	SSOs Reported	0	Investigations	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.
		Inspections: -Grease traps and lift stations -Food oil storage units and drum storage areas	163 (Grease Traps) 26 (Lift Stations) 62 (Food Oil Storage) 38 (Drum Storage Area)	Inspections (SPCC, Wastewater, Lift Station, and Grease traps)	

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 Cont.	Industrial Pretreatment Samples	28	Samples	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	48,120	Gallons (Grease traps and oil/water separator)	
	BMP 4.2.4 Storm Sewer Mapping	GIS Maps	1 Map (22 Inlets, 1915 ft. of Storm sewer, 1 Structural BMP, 360 ft. of Channel, 10 Outlets)	Updated 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.
		Spills Reported	3	Spill Response and Investigations	Yes. When illicit discharges or spills are reported, staff will immediately respond and implement BMPs to prevent the discharge from entering the MS4 or mitigate any potential harm to the environment. Outfalls are also inspected throughout the year to monitor for dry weather flows and potential illicit discharges or connections.
		Outfalls	79	Outfalls Inspected	
	BMP 4.2.6 Training on Illicit Discharge Detection, Reporting, and Response	Trainings: Staff ID detection and Reporting Staff spill and ID response	250 6 (Spill Team)	Trainings	No. This BMP does not result in direct reduction of pollutants; however, it does educate target audiences on eliminating and reporting illicit discharges.

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 4.2.6 Cont.	Staff IDDE Hotline (One a Permit cycle	9	Trainings	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	Advertise Hotline	1 (Newsletter) 3 (Trainings)	University Advertisements	No. This BMP does not result in direct reduction of pollutants; however, it does promote target audiences to properly report illicit discharges.
		Reported Illicit Discharges	0	Illicit discharge reports through hotline	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	Campus Pickups: - Hazardous & Universal Waste	48 (weekly)	Conducted pickups across permit year	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)**
2. Illicit Discharge Detection and Elimination	BMP 4.2.8 Cont.	- Batteries and Ink Jet Cartridges - Single-Stream Recycling	24 1,091 (weekly)	Conducted pickups across permit year	Yes. By providing an avenue for the campus community to properly dispose of materials, illegal dumping is prevented.
		Waste Volumes Disposed or Recycled	646,649 lbs. (Recycling)	Pounds of properly disposed materials (e.g., recycling, hazardous waste, and universal waste)	
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.

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 5.2.2 MS4 Compliance Plan for Construction Activities	Plan Reviews	7	Plans Reviews (e.g., drawings/ specifications/ sediment & erosion controls, SWPPP plans and drawings, and post-construction BMP selection)	No. This BMP does not result in direct reduction of pollutants; however, it does provide an opportunity for staff to comment on specific needs for projects to reduce potential pollutant discharges due to 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.

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 5.2.3 MS4 Compliance Inspections	Construction Stormwater Compliance Checklist	17	MS4 Compliance Inspections	Yes. Inspecting construction sites allows inspectors to assess BMP appropriateness and address potential issues on-site for pollution prevention.
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	1	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.

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 6.2.3 Inventory of Structural BMPs	Review: Inventory list of structural BMPs Owners/ operators for BMP	1 added 0 removed 1	New and Removed BMPs Internal Guidance Document	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	1	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.
		Plan Reviews	7	Plan Reviews	
	BMP 6.2.5 Inspection Program for Structural BMPs	Inspection checklist and fact sheets	9 (inspections) 12 (fact sheets)	Internal Guidance Document	No. The BMP does not result in direct reduction of pollutants; however, by reviewing and updating inspection checklists frequently, BMP inspections are made more effective and will ultimately result in better functioning structural controls.

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 Cont.	Training on BMP inspections	2	Number of individuals trained	No. This BMP does not result in direct reduction of pollutants; however, periodically training structural BMP inspectors will ultimately result in more effective inspections being performed.
		Inspection Records	49	Inspections	No. This BMP does not result in direct reduction of pollutants; however, inspections result in assessed functionality and maintenance needs.
	BMP 6.2.6 Operation and Maintenance of Structural BMPs	Operations and Maintenance Plans	0	Projects Requiring BMP O&M Plans	No. This BMP does not result in direct reduction of pollutants; however, O&M plans provide clear guidance for structural BMP owners on how to maintain their controls effectively.
		Inter-Departmental Meeting	2	Number of meetings for collaboration	No. This BMP does not result in direct reduction of pollutants; however, collaboration among MS4 stakeholders ensures tasks are being completed in a timely manner.

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	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 that can be identified in the SOP and removed or modified as a result of the inspection.
		Inspection checklist records	45	Total Number of Site-Specific Inspections	
	BMP 7.2.2 Inventory of Permittee-Owned Facilities	Permittee-Owned Inventory	0 Removed 2 Added	Total Number of Buildings Added or Removed from Inventory	No. This BMP does not result in direct reduction of pollutants; however, it does help to identify areas on campus that are subject to good housekeeping and pollution prevention inspections.

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	255	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	192	Totals Numbers of Online SPCC Training of Staff.	
	BMP 7.2.4 Oil Recycling Program	Manifests	115	Gallons recycled	Yes. By providing an avenue for the campus community to properly dispose of used oil, illegal dumping of hydrocarbons can be prevented.
	BMP 7.2.5 Characterize BMP Wastes for Disposal	BMPS Waste Profiles	0	BMP Waste Profiles	No. This BMP does not result in direct reduction of pollutants; however, it does indirectly reduce pollution in the system.
		Waste Sampling Results	0	Sample analysis results	

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 7.2.5 Cont.	Waste Removed	61,404	Pounds of Waste Removed	
	BMP 7.2.6 Campus Standards for Turf Management	Administrative Document	1	Internal Guidance Document	No. This BMP does not result in direct reduction of pollutants; however, it does set turf management standards and ensures that all licensed applicators are up to date on training.
		Licensed applicator records	8	Records of training and certification	
	BMP 7.2.7 Contractor Oversight	Contractor Complaints	2	Complaints for Contractor Non-Compliance to GH & PP BMPs	Yes. By responding to and investigating complaints made against contractor non-compliance our staff can assess and remove potential pollutants from campus.

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

Table 3: Measurable Goals Status		
MCM(s)	**Measurable Goal(s)**	**Explain progress toward goal**
1. Public Education, Outreach and Involvement	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.	Met goal. Comprehensive Stormwater Education and Outreach Program updated June 2019. No updates needed in Year 4.
	Post a minimum of 12 stormwater educational messages on What Goes Here Flows Here Facebook page or Texas State social media.	Met goal. Posted 68 stormwater educational messages through What Goes Here Flows Here Facebook page, 62 messages through What Goes Here Flows Here Instagram, and 7 through the TXST EHSREM Facebook page.
	Distribute educational and promotional materials at five community events.	Met goal. Distributed 2,187 educational materials at 18 community events.
	Broadcast stormwater message via email to the campus community twice per year.	Met goal. Four campus wide emails were sent out. Two emails advertising the Fall and Spring River Clean Ups and two emails addressing litter on campus were sent out.
	Annually review training materials and update training content at least once before the end of Year 5 (2024).	Met goal. One new material developed or adapted in Year 4.

Table 3: Measurable Goals Status		
MCM(s)	**Measurable Goal(s)**	**Explain progress toward goal**
1. Public Education, Outreach and Involvement	Once per year, provide training for Texas State construction staff.	Met goal. Provided training materials for annual construction staff training. 22 individuals were trained.
	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.	Met goal. Trained 928 contractors and subcontractor superintendents on basic SWPPP inspection expectations and site controls.
	Provide at least 75% of new students with stormwater pollution prevention awareness information.	Met goal. Provided stormwater awareness to new students (4,319) as part of University Seminar class required for incoming freshmen. Four (4) campus wide emails were sent to all students regarding pollution prevention information.
	Provide at least 75% of new employees with stormwater pollution prevention awareness information.	Met goal. Provided stormwater awareness training to new employees (238). Four (4) campus wide emails were sent to all staff regarding pollution prevention information.

Table 3: Measurable Goals Status		
MCM(s)	**Measurable Goal(s)**	**Explain progress toward goal**
1. Public Education, Outreach and Involvement	Once per year, provide aquatic pet and pet waste awareness information to on-campus residents.	Met goal. Aquatic pet and pet waste information was provided one (1) time during Year 4. 6,395 students received the information during the Spring moveout.
	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.	Met goal. SWMP was made available at the campus library and the stormwater website to the public within 30 days of approval.
	Review and respond to 100% of stormwater concerns and request for information submitted through webpage's contact request page.	Met goal. Zero (0) stormwater concerns were submitted through the webpage.

Table 3: Measurable Goals Status		
MCM(s)	**Measurable Goal(s)**	**Explain progress toward goal**
1. Public Education, Outreach and Involvement	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.	Met goal. Public notice was published on May 24, 2022, in the San Marcos Daily Record.
	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.	Met goal. Affidavit of publication and a copy of the public notice were sent to the Office of the Chief Clerk within 60 days of receiving the initial written instructions
	Create a Stormwater Advisory Committee	Met goal. Committee created in Year 1 of permit cycle.
	Host one meeting per year to discuss SWMP and the implementation of the selected BMPs.	Met goal. Committee meeting (with 13 members in attendance) held on November 4th, 2021

Table 3: Measurable Goals Status		
MCM(s)	**Measurable Goal(s)**	**Explain progress toward goal**
1. Public Education, Outreach and Involvement	Participate in a minimum of five events annually.	Met goal. Staff participated in 20 events throughout the permit year.
	Install a minimum of 25 inlet markers and storm drains in new construction or remodeled areas of campus.	Met goal. Volunteers installed 34 inlets marks during a Bobcat Build event.
2. Illicit Discharge Detection and Elimination (IDDE)	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).	Met goal. Updated in August 2019, no updates needed during Year 4.
	Review 80% of construction designs and specifications to verify that illicit connections do not exist between storm and sanitary sewers.	Met goal. Conducted seven (7) plan reviews and included prohibition of cross-connections in comments.
	Field verify 100% of new construction projects to confirm that illicit connections do not exist between storm and sanitary sewers.	Met goal. All new construction projects were field verified to confirm that illicit connection did not exist between storm and sanitary sewers.

Table 3: Measurable Goals Status		
MCM(s)	**Measurable Goal(s)**	**Explain progress toward goal**
2. Illicit Discharge Detection and Elimination (IDDE)	Respond to and investigate 100% of Texas State SSOs reported to Facilities that result in an illicit discharge. Document corrective action taken.	Met goal. Zero (0) SSOs occurred that resulted in an illicit discharge.
	Inspect at least 50% of campus grease traps and lift stations annually for maintenance needs and make repairs.	Met goal. 163 grease traps inspected, 15 pumped out, and 0 repaired. 26 lift stations inspected, 0 pumped out, 4 repaired.
	Inspect 25% of grease traps, food oil storage units, and drum storage areas four times per year in conformance with the SPCC Plan.	Met goal. 62 food oil storage unit inspections. 38 drum storage area inspections.
	Sample 100% of select wastewater ports twice per year in accordance with the Industrial Pretreatment Permit.	Met goal. All fourteen (14) wastewater ports were sampled twice in Year 4, resulting in 28 samples.

Table 3: Measurable Goals Status		
MCM(s)	**Measurable Goal(s)**	**Explain progress toward goal**
2. Illicit Discharge Detection and Elimination (IDDE)	Once per year, assess maintenance needs of grease traps, grit traps, and oil/water separators. Service units as needed.	Met goal. Maintenance needs were assessed, and 48,120 gallons of material was removed from grease traps, grit traps and oil/water separators in Year 4.
	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).	Met goal. All new stormwater infrastructure was digitized from as-builts and added to the campus MS4 map.
	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).	Met goal. IDDE Program updated.
	Investigate and respond to 100% of reports of spills that may result in an illicit discharge within the MS4.	Met goal. Our staff investigated, responded to and remediated all 3 spills reported in Year 4.

Table 3: Measurable Goals Status		
MCM(s)	**Measurable Goal(s)**	**Explain progress toward goal**
2. Illicit Discharge Detection and Elimination (IDDE)	Conduct visual observations of 20% of MS4 outfalls each year.	Met goal. A total of seventy-nine (79) outfalls were inspected in Year 4.
	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).	Met goal. Provided IDDE training to 250 employees.
	Provide technical training for 100% of applicable staff each year tasked with spill and illicit discharge response, inspections, and outfall monitoring.	Met goal. Technical training provided for nine (9) staff members through 5 spill response trainings/meetings and 1 refresher HAZWOPER.
	Provide training at least once before the end of Year 5 (2024) for 100% of staff responsible for operating the IDDE hotline.	Met goal. Provided training for nine (9) IDDE Hotline responsible staff.

Table 3: Measurable Goals Status		
MCM(s)	**Measurable Goal(s)**	**Explain progress toward goal**
2. Illicit Discharge Detection and Elimination (IDDE)	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.	Met goal. Hotline number (512-245-IDDE) is still active for use by campus community; however, the information was advertised in one (1) university newsletter. To ensure the message was adequately broadcasted, we included the information in all trainings.
	Review and respond to 100% of illicit discharges reported through the hotline number.	Met goal. Zero illicit discharges were reported through the IDDE hotline in Year 4.
	Conduct at least 40 campus pickups of hazardous waste and universal waste each year. Dispose of hazardous waste and record volumes.	Met goal. Forty-eight (48) campus pickups of hazardous waste were conducted in Year 4.
	Conduct at least 6 campus pickups of lead acid batteries and ink jet cartridges each year. Recycle batteries/cartridges and record volumes.	Met goal. Twenty-four (24) pickups were performed over the course of Year 4.
	Conduct at least 40 campus pickups of single-stream recycling of aluminum, plastic, glass, paper, and cardboard each year.	Met goal. Conducted daily, weekly, bi-weekly, monthly, and on-call pickups of recyclable materials (cardboard, paper, and mixed stream) over 49 weeks totaling 1,091 pickups.
	Document volume of wastes disposed or recycled annually.	Met goal. 646,649 lbs. of universal waster, hazardous waste and single-stream recyclables were disposed of or recycled in Year 4.

Table 3: Measurable Goals Status		
MCM(s)	**Measurable Goal(s)**	**Explain progress toward goal**
3. Construction Site Stormwater Runoff Control	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).	Met goal. Updated in August 2019, no updates needed during Year 4.
	Within one year, revise existing checklists to follow for plan review.	Met goal. Checklist revised in Year 1 and Year 2.
	Review 75% of drawings/specifications/ sediment & erosion control plans, SWPPP plans and drawings, and post-construction BMP selection on new construction and redevelopment.	Met goal. Reviewed seven (7) of erosion control plans, SWPPP drawings and post-construction BMP selection, for projects one acre or larger in size.
	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.	Met goal. MS4 Compliance Plan for Construction Activities was updated and accepted in August 2020 Year 2. No updates needed during Year 4.

Table 3: Measurable Goals Status		
MCM(s)	**Measurable Goal(s)**	**Explain progress toward goal**
3. Construction Site Stormwater Runoff Control	Conduct at least two MS4 Compliance Inspections during active construction on sites regulated under the TXR150000; document inspection findings.	Met goal. Conducted seventeen (17) quarterly MS4 Inspections on active construction sites permitted under the TXR150000.
4. Post-Construction Stormwater Management in New Development and Redevelopment	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).	Met goal. Updated in August 2019, no updates needed during Year 4.
	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).	Met goal. Post-Construction Stormwater Management Program reviewed; updates in progress and will be completed in Year 5.
	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	Met goal. All newly constructed structural BMPs were added to the existing inventory table and map.

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 list of owners/ operators (responsible departments) for BMP maintenance. 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).	Met goal. Ownership list and BMP inventory are maintained and reviewed annually. Updates are ongoing and will be made by the end of Year 5 (2023).
	Within one year, revise existing checklists to follow for plan review.	Met goal. Checklist revised and updated in Year 2. No updates needed in Year 4.
	Review 75% of drawings/specifications/ sediment & erosion control plans, SWPPP plans and drawings, and post-construction BMP selection on new construction and redevelopment.	Met goal. Reviewed seven (7) of erosion control plans, SWPPP drawings and post-construction BMP selection, for projects one acre or larger in size. Two (2) of those reviews contained plans for new Post construction Structural Controls.
	Once per year, review structural BMP fact sheets and inspection form. Update fact sheet and inspection form at least once before the end of Year 5 (2024).	Met goal. BMP inspection sheets for all structural controls updated in Year 4.

Table 3: Measurable Goals Status		
MCM(s)	**Measurable Goal(s)**	**Explain progress toward goal**
4. Post-Construction Stormwater Management in New Development and Redevelopment	Once before the end of Year 5, use fact sheets to train BMP inspectors on inspection protocols.	Met goal. Fact sheet review and updates are in progress and training for BMP inspectors will occur in Year 5 (2024).
	Inspect 50% of structural BMPs once per year to assess functionality and maintenance needs.	Met goal. 49 BMP inspections performed resulting in maintenance being performed 76 times during Year 3.
	Upon completion of a construction project, obtain 100% of O&M plans (or use industry standard) for new structural BMPs.	Met goal. No O&M plans acquired; however, industry standard has been adopted as the default O&M guidelines for new structural BMPs.
	Once per year, collaborate with responsible departments to assess structural BMP O&M needs based on O&M recommendations, inspection results, or both.	Met goal. Agenda item during the Stormwater Advisory Committee meeting. Meeting held with Utilities Operations.
5. Pollution Prevention/Good Housekeeping for Municipal Operations	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).	Met goal. O&M Program updated in 2020. No updates required in Year 4.

Table 3: Measurable Goals Status		
MCM(s)	**Measurable Goal(s)**	**Explain progress toward goal**
5. Pollution Prevention/Good Housekeeping for Municipal Operations	Within two years, develop one site-specific Standard Operating Procedures per facility for Pollution Prevention and Good Housekeeping activities.	Met goal. (2022) Departments developed six (6) site-specific Standard Operating Procedures for Pollution Prevention and Good Housekeeping activities for their respective facilities.
	Within five years, implement site-specific Standard Operating Procedures for each facility.	Goal in progress. Standard operating procedures will be implemented at each facility by the end of Year 5.
	Within five years, perform at least one site-specific inspection at each facility per year based on Standard Operating Procedures.	Goal in progress. Forty-five (45) site specific Good Housekeeping and Pollution Prevention inspections were conducted in Year 4.
	Once per year, review inventory list of permittee-owned facilities. Update outdated or incorrect information at least once before Year 5 (2024).	Met goal. Two (2) new permittee-owned facilities added to existing inventory in Year 4. Inventory in progress of being updated prior to end of Year 5 (2024).

Table 3: Measurable Goals Status		
MCM(s)	**Measurable Goal(s)**	**Explain progress toward goal**
5. Pollution Prevention/Good Housekeeping for Municipal Operations	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).	Met goal. 255 employees completed Good Housekeeping and Pollution Prevention annual training using SAP software system.
	Provide training to 75% of applicable staff on the SPCC Program. Update training content at least once before the end of Year 5 (2024).	Met goal. 192 employees completed Spill Prevention Control and Countermeasure annual training using SAP software system.
	Utilize services for used oil recycling at least once per year.	Met goal. Contracted services were utilized to recycle 115 gallons of used oil.
	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).	Goal in progress. No updates were needed for BMP waste characterization during Year 4. New sample analyses will be taken before the end of Year 5 (2024).

Table 3: Measurable Goals Status		
MCM(s)	**Measurable Goal(s)**	**Explain progress toward goal**
5. Pollution Prevention/Good Housekeeping for Municipal Operations	As necessary, collect samples of wastes from campus BMPs for waste characterization.	Met goal. No samples needed for waste characterization.
	Once per year, document volumes of waste removed from BMPs.	Met goal. 61,404 pounds of waste removed from BMPs.
	Once per year, review 25% of the Campus Standards for Turf Management. Update outdated or incorrect information at least once before Year 5 (2024).	Goal in progress. Campus Standards for Turf Management will be updated before Year 5 (2024).
	Once per year, obtain list of current licensed applicators on campus and retain records of licensed applicators on campus.	Met goal. 8 pesticide applicator licenses up to date.
	Respond to 100% of complaints for contractor non-compliance to address good housekeeping and pollution prevention BMPs.	Met goal. Two (2) complaints for contractor non-compliance were investigated by EHSREM in Year 4.

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 nine (9) active construction sites during Year 4, totaling seventeen (17) 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, seventy-nine (79), for MS4 outfalls and maintenance needs. Evidence of illicit discharges was not detected during inspections. Utilities Operations performed maintenance on campus outfalls, removing over 11,000 pounds of material from the MS4.
- Annual inspections of structural BMPs, forty-eight (48), were performed during Year 4 to determine functionality and maintenance needs. Maintenance activities were initiated based on inspections and O&M recommendations. The effectiveness of these BMPs were addressed and actions were taken to restore their functionality. The BMP inventory spreadsheet was updated to identify BMPs which are no longer effective or were currently out of order. Approximately 61,404 pounds of material were removed from structural BMPs throughout Year 4.
- Three (3) reports of potential illicit discharges were reported during Year 4. 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.

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 2022 Texas Integrated Report – Texas 303(d) List does not list the Upper San Marcos River, segment 1814, as impaired.

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 MS4 will continue to implement all BMPs that were authorized in this permit in Year 5 of the permit cycle.

Table 4

MCM(s)	BMP	Stormwater Activity	Description/Comments
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 4.
	Education and Outreach for Pollution Prevention	Post digital promotional materials onto free media outputs and What Goes Here Flows Here social media accounts.	Continuation from Year 4.
		Distribute educational and promotional materials at university and city sponsored environmental events or other appropriate activities.	Continuation from Year 4.
		Broadcast digital promotional materials onto free media outputs and list serves pertaining to the Campus Community.	Continuation from Year 4.

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 4.
		Provide annual training for Texas State construction staff.	Continuation from Year 4.
		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 4.
	Stormwater Awareness for Campus Community	Provide basic stormwater pollution prevention awareness information for new students.	Continuation from Year 4.
		Provide basic stormwater pollution prevention awareness information for new employees.	Continuation from Year 4.
		Implement aquatic pet and pet waste awareness campaign for on-campus residents.	Continuation from Year 4.

Table 4			
MCM(s)	**BMP**	**Stormwater Activity**	**Description/Comments**
1. Public Education, Outreach and Involvement	Web Page and Community Hotlines	Provide public access to the SWMP and annual reports through stormwater website within 30 days of approval of SWMP.	Continuation from Year 4.
		Review and respond to stormwater concerns and request for information submitted through webpage's contact request form.	Continuation from Year 4.
	Public Notice Requirements	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.	Completed in Year 4.
		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.	Completed in Year 4.
	Stormwater Management Program Advisory Committee	Hold annual meeting to discuss SWMP and the implementation of the selected BMPS.	Continuation from Year 4.
	Public Involvement and Outreach Events	Participate in a minimum of five community outreach events annually.	Continuation from Year 4.
		Install a minimum of 25 inlet markers and storm drains in new construction or remodeled areas of campus.	Continuation from Year 4.

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 4.
	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 4.
		Field verify construction as-built to confirm that illicit connections do not exist between storm and sanitary sewers.	Continuation from Year 4.
	Investigate and Prevent Sanitary Sewer Overflows	Investigate and respond to SSOs that result in an illicit discharge, document corrective action.	Continuation from Year 4.
		Investigate grease traps for maintenance needs, make repairs as necessary.	Continuation from Year 4.
		Conduct quarterly inspections of grease traps, food oil storage units, and drum storage areas in conformance with the SPCC Plan.	Continuation from Year 4.

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 4.
		Continue with regular servicing of grease traps, grit traps, and oil/water separators.	Continuation from Year 4.
	Storm Sewer Mapping	Continue to update the MS4 map showing new outfalls and modified or new storm sewer lines and inlets.	Continuation from Year 4.
	Illicit Discharge Detection and Elimination Program	Conduct an annual review of the IDDE Program. Update as necessary.	Continuation from Year 4.
		Investigate and respond to all spills that may result in an illicit discharge within the MS4.	Continuation from Year 4.
		Conduct visual observations of MS4 outfalls annually.	Continuation from Year 4.

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 4.
		Continue to provide technical training for staff tasked spill and illicit discharge response, inspections, and outfall monitoring.	Continuation from Year 4.
		Provide training for staff responsible for operating the IDDE Hotline.	Continuation from Year 4.
	IDDE Hotline Number and Follow-Up Procedures	Maintain the hotline number for the public to report illicit discharge or illegal dumping. Continue to advertise the hotline number to the campus community.	Continuation from Year 4.
		Continue to review and respond to illicit discharges reported through the hotline number.	Continuation from Year 4.
	Hazardous Waste and Recycle Material Collection Programs	Continue to periodically collect hazardous waste and universal waste.	Continuation from Year 4.
		Continue to collect lead-acid batteries and ink jet cartridges.	Continuation from Year 4.
		Continue to collect single-stream recycling of aluminum, plastic, glass, paper and cardboard from all buildings.	Continuation from Year 4.
		Document volume of wastes disposed of or recycled annually.	Continuation from Year 4.

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 4.
	MS4 Compliance Plan for Construction Activities	Continue reviewing drawings/specifications/sediment & erosion control plans, SWPPP plans and drawings, and post-construction BMP selection on new construction and redevelopment.	Continuation from Year 4.
		Annually review the MS4 Compliance Plan. Update as necessary and incorporate changes into Texas State Construction Standard supporting documentation.	Continuation from Year 4.
	MS4 Compliance Inspections	Perform MS4 Compliance Inspections on active construction sites regulated under the TXR150000 and document inspection findings.	Continuation from Year 4.
	Education/Training for Construction Personnel	See Table 3 - 1 Public Education, Outreach and Involvement	Continuation from Year 4.
	Stormwater Hotline for Construction Runoff Issues	See Table 3 - 1 Public Education, Outreach and Involvement	Continuation from Year 4.

Table 4			
MCM(s)	**BMP**	**Stormwater Activity**	**Description/Comments**
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 4.
	Post-Construction Stormwater Management Program	Conduct an annual review of the Post-Construction Stormwater Management Program. Update as necessary.	Continuation from Year 4.
	Inventory of Structural BMPs	Update the table and map as new BMPs are added or discovered.	Continuation from Year 4.
		Maintain list of owners/operators (responsible departments) for BMP maintenance.	Continuation from Year 4.
	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 4.

Table 4			
MCM(s)	**BMP**	**Stormwater Activity**	**Description/Comments**
4. Post - Construction Stormwater Management in New Development and Redevelopment	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 4.
		Update and maintain BMP fact sheets and use to train inspectors as needed.	Continuation from Year 4.
		Continue to use fact sheets to train BMP inspectors on inspection protocols.	Continuation from Year 4.
		Continue to inspect structural BMPs annually to assess functionality and maintenance needs.	Continuation from Year 4.
	Operation and Maintenance of Structural BMPs	Request operation and maintenance plans for structural BMPs upon completion of construction project.	Continuation from Year 4.
		Require responsible departments to perform O&M on structural BMPs based on O&M recommendations, inspection results, or both.	Continuation from Year 4.

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 4.
		Implement site-specific Standard Operating Procedures for each facility.	Continuation from Year 4.
		Perform site-specific inspections based on Standard Operating Procedures.	Continuation from Year 4.
	Inventory of Permittee-Owned Facilities	Review inventory list annually, updated as necessary.	Continuation from Year 4.
	Employee Training Program	Continue to provide annual training for staff on good housekeeping/pollution prevention activities.	Continuation from Year 4.
		Continue to provide annual training for staff on the SPCC Program.	Continuation from Year 4.

Table 4			
MCM(s)	**BMP**	**Stormwater Activity**	**Description/Comments**
5. Pollution Prevention/ Good Housekeeping for Municipal Operations	Oil Recycling Program	Continue utilizing services for used oil recycling.	Continuation from Year 4.
	Characterize BMP Waste for Disposal	Continue annual review of campus stormwater BMP waste profiles. Update as necessary.	Continuation from Year 4.
		Collect samples of wastes from campus BMPs for waste characterization.	Continuation from Year 4.
		Document sampling results and volumes of waste removed annually.	Continuation from Year 4.
	Campus Standards for Turf Management	Review Campus Standards for Turf Management and update as necessary.	Continuation from Year 4.
		Continue encouraging licensed applicator training and retain records of licensed applicators on campus.	Continuation from Year 4.
	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 4.

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 __X__No

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

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?

__X__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 __X__No

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

_____Yes __X__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):

One (1) Large Site Notice was received by Texas State University in 2022. The university regulates all construction sites regardless of acreage disturbed however, and the number of active sites in 2022 was eight (8), not including building remodels that did not alter the exterior of buildings.

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

_____Yes ___**X**__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

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, Risk and Emergency Management**

Signature: Wendy R. McCoy Date: 11-2-2022

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).