Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number TXR040000

A. General Information

Authorization Number TXR040427 Annual Report Year: Year 1

MS4 Operator Level: 2 Name of MS4/Permittee: Texas State University

Contact Name: Russell Clark, CSP Telephone Number: 512-245-3616

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B. Narrative Provisions (Part IV Section B.2.(a))

Provide information on the status of complying with permit conditions: (Part V - Standard Permit Conditions):

	Yes	No	Explain
Permittee is currently in compliance with the SWMP as submitted to and approved by the TCEQ.	X		
Permittee is currently in compliance with recordkeeping and reporting requirements.	X		
Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.)	X		

1. Provide a general assessment of the appropriateness of the selected BMPs. See Table 1.

Table 1		
MCM(s)	**BMP**	**BMP is appropriate for reducing the discharge of pollutants in stormwater (yes or no). Explain.**
1. Public Education, Outreach and Involvement	Comprehensive Stormwater Education and Outreach Program	Yes, identified methods and products to reach university target audiences in stormwater awareness.
	Storm Water Quality Education Materials	Yes, prepared educational materials help to inform the public on why polluted stormwater runoff is bad, how it affects our water bodies, and how they can help limit these pollutants.
	Awareness Outreach for Employees and Students	Yes, training increased awareness of stormwater quality protection and the different ways pollutants can reach the waterways.
	Public Notice Requirements	Yes, informing the general public of the program and how Texas State University is implementing campus stormwater management program.
	Storm Drain Stenciling or Marker Program	Yes, educating the public using signage showing that water that flows into storm drains does not get treated before entering the rivers and creeks.
	Community Events	Yes, educating participants about stormwater flow and how they can help decrease contaminated stormwater runoff by performing activities to prevent pollutants from reaching the river.

Table 1		
MCM(s)	**BMP**	**BMP is appropriate for reducing the discharge of pollutants in stormwater (yes or no). Explain.**
2. Illicit Discharge, Detection and Elimination	Develop UPPS for Illicit Discharge Prohibition and Construction and Post Construction Enforcement	Yes, during Year 1 drafted a new University Policy and Procedures (UPPS) to address the University's authority to enforce permit conditions. This will improve stormwater discharges to the river.
	Storm Sewer Mapping	Yes, the storm sewer system consisting of 15 miles of piping and over 500 curb and area inlets were mapped as part of the SWMP submittal. Mapping included in awareness training and shows connection to the drainage system and the river.
	Develop the Illicit Discharge Detection and Elimination (IDDE) Program for Storm Sewer	Yes, continued grease trap inspections in Year 1 helped prevent overflow of oily water to surfaces and runoff to the storm drain. Preparation of an outline for the IDDE program increased awareness of storm drain and sanitary sewer piping systems.
	Hazardous Waste and Recycle Material Collection Programs	Yes, continued routine collection of hazardous waste resulted in old chemicals being transferred and stored in the RCRA Hazardous Waste Storage Unit rather than outside or abandoned. Oil, plastics, paper and glass were also successfully kept out of the storm sewer system by routine collection and proper management.
3. Construction Site Stormwater Runoff Control	Develop UPPS for Illicit Discharge Prohibition and Construction and Post Construction Enforcement	Yes, during Year 1 drafted a new University Policy and Procedures (UPPS) to address the University's authority to enforce permit conditions. This will improve stormwater discharges to the river.

Table 1		
MCM(s)	**BMP**	**BMP is appropriate for reducing the discharge of pollutants in stormwater (yes or no). Explain.**
3. Construction Site Stormwater Runoff Control	Monitor Compliance with Stormwater Requirements for New Construction and Redevelopment	Yes, the initial review of construction contracts for the General MS4 Authority UPPS resulted in awareness of stormwater protection measure already in place and consideration of additional measures.
	Site Plan Review Program	Yes, review of site plans on all construction projects with outside soil disturbance resulted in adequate BMPs for erosion and sediment control.
	Construction Site Inspection Program	Yes, routine joint inspections between Texas State University departments and the Contractor resulted in maintenance or replacement of BMPs and improved stormwater runoff.
4. Post-construction Stormwater Management in New Development and Redevelopment	Prepare UPPS for Post Construction Runoff	Yes, during Year 1 drafted a new University Policy and Procedures (UPPS) to address the University's authority to enforce permit conditions. This will improve stormwater discharges to the river.
	Program for Runoff from New Development and Redevelopment	Yes, review of the Campus Stormwater Drainage Study and Plan, Section 7, includes design criteria that will reduce the volume of stormwater flow and improve the stormwater quality.
	Inventory of Structural BMPs	Yes, having a list of BMPs on campus with recommended maintenance will improve their performance and effluent water quality.
	Review Design Packages for Post Construction BMPs	Yes, post construction BMPs improve water quality of discharges leaving new construction and redevelopment.
	BMP Inspection Program	Yes, increases maintenance awareness of BMPs and results in cleaner water quality.

Table 1		
MCM(s)	**BMP**	**BMP is appropriate for reducing the discharge of pollutants in stormwater (yes or no). Explain.**
	Characterize BMP Wastes for Disposal	Yes, clarifies requirements for offsite rather than onsite disposal of stormwater related wastes.
5. Pollution Prevention/Good Housekeeping for Municipal Operations	Prepare an Operation and Maintenance Program	Yes, preparation of an outline for the Good Housekeeping/Pollution Prevention Plan raised awareness of pollutant sources at municipal-type facilities.
	Fleet and Equipment Maintenance	Yes, SPCC training on spill response results in less oil on the ground and runoff pathways. Maintenance of the grit trap and oil/water separator eliminates overflow of these wastes to surfaces and runoff pathways.
	Golf Course, Intramural Fields and Grounds Operations	Yes, preparation of an outline for the turf management plan increased awareness of pollutant sources from fertilizers and pesticides and practices in place to reduce those pollutants from entering waterways.
	Employee Training Program	Yes, continually trained applicators use industry standards when applying and/or limiting chemical applications and this reduces the amount of chemical runoff from the campus fields and Golf Course.

2. Describe progress towards reducing the discharge of pollutants to the maximum extent practicable. 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:

   See Attachment A and information in Table 2 below.

3. Provide the measurable goals for each of the MCMs, and an evaluation of the success of the implementation of the measurable goals (See Example 2 in instructions):

Table 2		
MCM(s)	**Measurable Goal(s)**	**Success**
1. Public Education, Outreach and Involvement	Develop the Comprehensive Stormwater Education and Outreach Program to include required components of the MS4 permit.	Met goal. Working internal document.
	Acquire stormwater educational materials from EPA, TCEQ and other MS4s. Customize materials with local logos and contact information.	In progress. Various materials have been developed and acquired, while some will be created with the help of University Marketing. See **Attachment A** for examples.
	Provide basic stormwater pollution prevention awareness input into new employee and new student orientation.	Exceeded goal. New employees (200) were trained in general stormwater awareness (powerpoint, take-home handout). New students (663) were trained in general stormwater awareness (interactive tour). Stormwater awareness messages were added to the Texas State University Volunteer Newsletter, opened by recipients 4,873 times in Year 1. See Table 6 in **Attachment A** for training data.
	Comply with all Public Notice legal requirements for NOI and SWMP implementation.	Met goal. TCEQ received NOI and SWMP on May 16, 2014.

Table 2		
MCM(s)	**Measurable Goal(s)**	**Success**
1. Public Education, Outreach and Involvement	Publish the executive director's preliminary determination in a newspaper of general circulation in Hays County within 30 days after being notified by TCEQ Office of Chief Clerk.	Met goal. -August 11, 2014 – Draft Public Notice received by TCEQ -August 11, 2014 – Draft Public Notice reviewed by Texas State University and approved -August 26, 2014 – Notification packet from Chief Clerk's office received by Texas State University -September 14, 2014 – Submitted notice to newspaper for public comment (within allowed 30 days) -October 14, 2014 – 30 day comment period ended, no comments received
	Select a new design for storm drain manhole covers.	Met goal. See **Attachment A** for new design and art contest description.
	Participate in at least one San Marcos River cleanup each year.	Met goal. March 1, 2014 – 227 volunteers cleaned 13 areas in 3 hours. 4023 pieces of trash were thrown away or recycled. See **Attachment A** for data and photos. Attachment A Table 1 lists all Public Participation events.
	Work with Bobcat Build volunteers once a year on stormwater cleanup, maintenance or other related projects.	Met goal. March 29, 2014 – 45 participants picked up trash and recyclables along the Texas State University Disc Golf Course. See **Attachment A** for data and photos. Attachment A Table 1 lists all Public Participation events.
	Continue with Texas State volunteer groups for Keep San Marcos Beautiful (KSMB) "Adopt-a-Spot" projects.	Met goal. 12 groups from Texas State participated in Adopt-a-Spot projects. 167 volunteers spent approximately a combined 10 hours collecting 27 bags of garbage and 21 bags of recyclables. See **Attachment A** for data. Attachment A Table 1 lists all Public Participation events.

Table 2		
MCM(s)	**Measurable Goal(s)**	**Success**
2. Illicit Discharge Detection and Elimination (IDDE)	Draft language to include in the General MS4 Authority UPPS prohibiting illicit connections to the storm sewer and waters of the state.	Met goal. Draft UPPS submitted to review team 12-10-2013 Second draft on 10-29-2014 Third draft on 11-18-2014
	Circulate for internal review	Met goal.
	Continue to update the MS4 map showing new outfalls and modified or new storm sewer lines and inlets.	Met goal. Over 5 miles and 500 curb and area inlets already mapped in years prior to MS4 permit application. 16 outfalls already mapped in years prior to MS4 permit application. 1.16 miles of new storm drain piping was added along with 14 new curb inlets and 25 new area drains.
	Continue inspection of grease traps and lift stations and replace broken manhole covers with Texas State salamander covers.	Exceeded goal. 46 grease traps inspected, 1 pumped out, and 4 repaired. 10 lift stations inspected and 3 repaired. 0 broken manhole covers were found, 0 replaced. 7 compactors were inspected 185 times over 37 weeks, 23 incidents were responded to and resolved.
	Continue to provide weekly waste pickups on campus to shops and labs.	Exceeded goal. 33 pickups of hazardous and industrial waste in Year 1.
	Continue to offer monthly battery pickup and annual electronic waste recycling.	Met goal. 9 collections of alkaline and rechargeable batteries in Year 1 and hosted annual Electronics Recycling Event on April 26, 2014. See **Attachment A** for photos and Table 1 in Attachment A for a summary of Public Participation events.

Table 2		
MCM(s)	**Measurable Goal(s)**	**Success**
2. Illicit Discharge, Detection and Elimination (IDDE)	Continue to collect recyclable materials from all academic buildings, shops and dorms on a scheduled basis.	Met goal. One pickup of recycled oil. Daily pickup of recyclable materials (cardboard, paper, and mixed stream) over 37 weeks (185 pickups total) in Year 1.
	Continue to record the volume of hazardous waste and recyclable materials picked up and report to management annually.	Met goal. Collected a total of 30 tons of hazardous and industrial waste in 33 pickups. Recycled a total of 271 tons of recyclable materials (cardboard, plastics, and mixed stream) through weekly pickups and self-serve drop off. Collected 180 gallons of recycled oil. Recycled a total of 1,800 pounds of alkaline and rechargeable batteries in 9 pickups. Collected 15 tons of recyclable, end-of-life electronics. Hazardous waste reported to TCEQ on 1-28-2014 in the Annual Waste Summary Report. See Table 2 in **Attachment A.**
3. Construction Site Stormwater Runoff Control	Draft language to include in the General MS4 Authority UPPS for construction runoff control and illicit discharges.	Met goal. Draft UPPS submitted to review team 12-10-2013 Second draft on 10-29-2014 Third draft on 11-18-2014
	Circulate for internal review	Met goal.
	Continue to monitor compliance with stormwater program for new construction and redevelopment.	In progress. Draft Standard Operating Procedures for initiating and completing projects developed and under review. Construction standards and contract language identified for review.

Table 2		
MCM(s)	**Measurable Goal(s)**	**Success**
3. Construction Site Stormwater Runoff Control	Continue with the process of reviewing erosion control plans, SWPPP drawings and post construction BMP selection on site plans for new construction and redevelopment.	Exceeded goal. Reviewed 83% of erosion control plans, SWPPP drawings and post construction BMP selection. Plan Review table maintained by EHSRM office and available to review upon request. Too large to include in Attachment A.
	Continue with existing program of weekly SWPPP site inspections and reporting for 1 acre and larger sites.	Met goal. Performed 61 SWPPP site inspections. See Table 3 in **Attachment A.**
	Continue attending conferences and training to increase skills and knowledge for construction inspectors.	Met goal. Workshops attended – 12 Total professional development hours – 171 Total number of attendees – 33 See Table 4 in **Attachment A.**
4. Post-Construction Stormwater Management in New Development and Redevelopment	Include in the General MS4 Authority UPPS policies for post construction runoff control and O&M of structural BMPs to protect stormwater quality and minimize the discharge of pollutants.	Met goal. Draft UPPS submitted to review team 12-10-2013 Second draft on 10-29-2014 Third draft on 11-18-2014
	Circulate for review	Met goal.

Table 2		
MCM(s)	**Measurable Goal(s)**	**Success**
4. Post-Construction Stormwater Management in New Development and Redevelopment	Develop program and determine whether to include Campus Stormwater Drainage Study and Plan recommendations for new development.	In progress. Initial meetings between responsible parties occurred to determine existing documents and an outside consulting firm will possibly provide assistance with plan development.
	Circulate for review and finalize.	In progress.
	Continue compiling information on the locations and kinds of structural BMPs on campus.	Met goal. Existing inventory of 44 BMPs identified initially. 1 new in-ground 50,000 gallon cistern was added and 1 grass swale was removed from BMP list.
	Prepare a maintenance schedule for the BMPs	In progress. Schedule drafted, review and edits are in process.
	Develop a checklist of items to include in the review of project plans greater than one acre.	Met goal. Draft Drainage Plan Review Checklist developed and reviewed for Moore Street Housing dorm on 1-10-2014. Further review and refinement will occur in Year 2.
	Perform O&M on structural BMPs according to the maintenance schedule.	Exceeded goal. 5 post-construction BMPs were cleaned and over 25 tons of material was removed for off-site disposal. See Table 5 in **Attachment A.**

Table 2		
MCM(s)	**Measurable Goal(s)**	**Success**
4. Post-Construction Stormwater Management in New Development and Redevelopment	Develop structural BMP inspection forms. Include references and any special instructions for the inspections	In progress. Reviewing TCEQ technical guidance as well as existing inspection forms used by other MS4s. will be edited and updated to be campus-specific.
	Review TCEQ requirements for Special Waste disposal	Met goal. Review completed 1-15-2014.
	Update the campus Waste Analysis Plan to include this waste stream and procedures for characterization and disposal.	Met goal. Waste Analysis Plan updated 1-15-2014.
5. Pollution Prevention/Good Housekeeping for Municipal Operations	Prepare the O&M program to include good housekeeping and pollution prevention practices for municipal-type facilities on campus.	Met goal. Outline of the Good Housekeeping/Pollution Prevention Plan prepared by EHSRM and reviewed by university departments. Outside professional services sought to prepare the program during Year 2.
	Circulate for review and finalize.	Met goal for review. Will finalize in Year 2.
	Continue SPCC training program for all personnel working with oil and petroleum products.	Met goal. 112 existing and new employees trained in December 2013. See Table 6 in **Attachment A**.

Table 2		
MCM(s)	**Measurable Goal(s)**	**Success**
5. Pollution Prevention/Good Housekeeping for Municipal Operations	Continue with grit trap and oil/water separator cleanout annually at the Facilities garage. Obtain or renew contract for these services.	Met goal. 10,000 pounds of grit trap and oil/water waste was removed from the 2 BMPs at the Physical Plant Garage in December 2013 annual cleanout. See Table 5 in **Attachment A**.
	Develop campus best management practices for a campus standard.	In progress. Outside professional services sought to prepare turf management practices
	Continue with licensed applicator required training and records retention. Maintain records electronically.	9 employees were recertified in licensed applicator training in Year 1. See Table 4 in **Attachment A**.

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

1. The MS4 has conducted analytical monitoring of stormwater quality and submitted in the annual report.

   ____Yes ___X___No

Not required for Level 2 MS4s. No TMDL for TDS impairment on Segment 1814 Upper San Marcos River.

a. Explain below or attach a summary to submit along with any monitoring data used to evaluate the success of the SWMP at reducing pollutants to the maximum extent practicable. Be sure to include a discussion of results:

Not Applicable

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:

   TDS contributions from the university and city sub watersheds were evaluated in a one-year study and modeling effort as part of the Upper San Marcos Watershed Characterization Report. This report is a component of the San Marcos Watershed Initiative to implement a community approved Watershed Protection Plan for the impaired upper San Marcos River. TDS was evaluated by modeling (Hydrological Simulation Program –Fortran BASINS 4.1model) and direct monitoring of instream samples. The modeling runs show that the two sub watersheds within the university result in instream concentrations of TDS between 105 to 120 mg/L, well below the impairment limit of 400 mg/L. Three sampling events December 2013 through August 2014 below Sessom Creek (university major outfall) and above Sessom Creek show a mean TDS concentration of 373 mg/L and 358 mg/L, respectively. The study shows that the university is not increasing the concentration of TDS in the San Marcos River.

2. Describe the implementation of targeted controls if the small MS4 discharges to an impaired water body with an approved TMDL (*Part II Section D.4.(a)*):

   Not Applicable

3. Report the benchmark identified by the MS4 and assessment activities (*Part II Section D.4.(a)(6)*):

   Not Applicable

4. Provide an analysis of how the selected BMPs will be effective in contributing to achieving the benchmark (Part II Section D.4.(a)(4)):

   Not Applicable

5. If applicable, report on focused BMPs to address impairment (*Part II Section D.4.(a)(5)*):

   Not Applicable

6. Describe progress in achieving the benchmark (*Part II.D.4.(a)(6)*):

   Not Applicable

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:

MCM(s)	BMP	Stormwater Activity	Description/Comments
1. Public Education, Outreach and Involvement	Comprehensive Stormwater Education and Outreach Program	Implement program and update as needed.	New task for Year 2.
	Stormwater Quality Education Materials	Acquire stormwater educational materials from EPA, TCEQ, and other MS4s. Customize materials with local logos and contact information.	Continuation from Year 1.
		Distribute educational materials such as brochures, fliers, door hangers, magnets at university and city sponsored environmental events or other appropriate activities.	New task for Year 2.
	Education/Training for Construction Personnel	Acquire stormwater educational materials from sources listed in section 2.2.2 of the SWMP as well as other appropriate sources. Customize materials with local logos and contact information.	New task for Year 2.
	Awareness Outreach for Employees and Students	Provide basic stormwater pollution prevention awareness input into new employee and new student orientation.	Continuation from Year 1.

MCM(s)	BMP	Stormwater Activity	Description/Comments
1. Public Education, Outreach and Involvement		Include pollution prevention and MS4 permit awareness messages in regularly published media such as newsletters, campus wide e-mails, web postings and electronic marquees.	New task for Year 2.
	Web Page and Community Hotlines	Enhance University web pages to include stormwater educational materials, contact information, and other appropriate materials.	New task for Year 2.
		Expand the website to include hotline numbers, Annual Reports, and event dates and schedules.	New task for Year 2.
	Storm Drain Stenciling or Marker Program	Incorporate new design on new and replacement storm drain covers.	New task for Year 2.
		Decide on a design and product (i.e. stenciling and/ or marker) for storm inlets. Determine number of inlets needing signage and order.	New task for Year 2.
		Install inlet markers on at least 10 curb inlets annually.	New task for Year 2.
	Community Events	Participate in at least one San Marcos River cleanup each year.	Continuation from Year 1.
		Work with Bobcat Build volunteers on stormwater cleanup, maintenance or other related projects.	Continuation from Year 1.

MCM(s)	BMP	Stormwater Activity	Description/Comments
		Continue with Texas State volunteer groups for Keep San Marcos Beautiful (KSMB) "Adopt-a-Spot" projects.	Continuation from Year 1.
2. Illicit Discharge, Detection and Elimination	Develop UPPS for Illicit Discharge Prohibition and Construction and Post Construction Enforcement	Draft language to include in the General MS4 Authority UPPS prohibiting illicit connections to the storm sewer and waters of the state.	Continuation from Year 1.
		Circulate for internal review	Continuation from Year 1.
		Finalize and include in employee training for shops, the garage, FPDC, Utilities Operations DHRL, Auxiliary Services and Grounds Operations.	New task for Year 2.
		Include policy in subcontracts as applicable	New task for 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 1.
		Annually review project closeout documents received by contractors to ensure they provide GIS compatible as-built's of the storm and sanitary sewer systems.	New task for Year 2.

MCM(s)	BMP	Stormwater Activity	Description/Comments
2. Illicit Discharge, Detection and Elimination	Develop the Illicit Discharge Detection and Elimination (IDDE) Program for Storm Sewer	Continue inspection of grease traps and lift stations and replace broken manhole covers with Texas State salamander covers.	Continuation from Year 1.
		Prepare the IDDE plan and circulate for review. Include testing procedures for drains determined to be potentially high risk for the MS4. Conduct dry weather flow semiannually.	New task for Year 2.
		Include procedures for verification of no cross connects between the storm and sanitary sewers in new development and remodel projects.	New task for Year 2.
	Training on IDDE and Outfall Monitoring	Develop training for field personnel and shops to educate what illicit discharges are and how to report and respond to them.	New task for Year 2.
	IDDE Hotline Number and Follow-Up Procedures	Establish a hotline number for the public to report illicit discharge or illegal dumping.	New task for Year 2.
		Develop procedures within the IDDE plan for responding to reports of illicit discharges and illegal dumping.	New task for Year 2.
		Continue to provide weekly waste pickups on campus to shops and labs.	Continuation from Year 1.

MCM(s)	BMP	Stormwater Activity	Description/Comments
	Hazardous Waste and Recycle Material Collection Programs	Continue to offer monthly battery pickup and annual electronic waste recycling.	Continuation from Year 1.
		Continue to collect recycle materials from all academic buildings, shops and dorms on a scheduled basis.	Continuation from Year 1.
		Continue to record the volume of waste and recyclable materials picked up and report to management annually.	Continuation from Year 1.
3. Construction Site Stormwater Runoff Control	Prepare a University Policy and Procedures Statement (UPPS) for Construction Site Runoff and Illicit Discharge Control	Draft language to include in the General MS4 Authority UPPS for construction runoff control and illicit discharges.	Continuation from Year 1.
		Circulate for internal review.	Continuation from Year 1.
	Monitor Compliance with Stormwater Requirements for New Construction and Redevelopment	Continue to monitor compliance with stormwater program for new construction and redevelopment.	Continuation from Year 1.
		Modify construction standards and contract documents to include additional provisions required by the MS4 permit.	New task for Year 2.
		Circulate for review, finalize and implement.	New task for Year 2.

MCM(s)	BMP	Stormwater Activity	Description/Comments
3. Construction Site Stormwater Runoff Control	Site Plan Review Program	Continue with the process of reviewing erosion control plans, SWPPP drawings and post construction BMP selection on site plans for new construction and redevelopment.	Continuation from Year 1.
		Develop a checklist of items to follow for plan review.	New task for Year 2.
		Review construction contracts and campus standards to ensure compliance with the TPDES General Construction Permit TXR150000 and MS4 Permit TXR40000.	New task for Year 2.
	Construction Site Inspection Program	Continue with existing program of routine SWPPP site inspections and reporting for one acre and larger sites.	Continuation from Year 1.
		Develop an electronic method of conducting inspections and reporting to streamline reporting.	New task for Year 2.
		Continue attending conferences and training to increase skills and knowledge of construction inspectors.	Continuation from Year 1.
		Resolve all noncompliance issues or pursue enforcement actions per the UPPS.	New task for Year 2.

MCM(s)	BMP	Stormwater Activity	Description/Comments
4. Post - Construction Stormwater Management in New Development and Redevelopment	Prepare UPPS for Post Construction Runoff Control	Include in the General MS4 Authority UPPS policies for post construction runoff control and O&M of structural BMPs to protect stormwater quality and minimize the discharge of pollutants.	Continuation from Year 1.
		Circulate for review.	Continuation from Year 1.
		Finalize UPPS.	New task for Year 2.
	Program for Runoff from New Development and Redevelopment	Develop program and determine whether to include Campus Storm-water Drainage Study and Plan recommendations for new development. Circulate for review and finalize.	Continuation from Year 1.
		Circulate for review.	Continuation from Year 1.
	Inventory of Structural BMPs	Prepare a maintenance schedule for the BMPs.	Continuation from Year 1.
		Update the table and map as new BMPs are added or discovered.	New task for Year 2.

MCM(s)	BMP	Stormwater Activity	Description/Comments
4. Post - Construction Stormwater Management in New Development and Redevelopment	Review Design Packages for Post Construction BMPs	Continue with plan review and project acceptance procedures using checklist.	New task for Year 2.
	Operation and Maintenance of Structural BMPs	Require contractors to submit operation and maintenance plans for structural BMPs.	New task for Year 2.
		Perform O&M on structural BMPs according to the maintenance schedule.	New task for Year 2.
	BMP Inspection Program	Develop structural BMP inspection forms. Include references and special instructions for the inspectors.	Continuation from Year 1.
		Enter the BMPs and checklists into an electronic inspection system such as CodePal.	New task for Year 2.
		Perform compliance inspections annually or more frequently to determine if maintenance is required.	New task for Year 2.
	Characterize BMP Wastes for Disposal	Collect samples of wastes from campus BMPs as maintenance for each unit is pending.	New task for Year 2.
		Document sampling results and volumes of waste removed annually.	New task for Year 2.

MCM(s)	BMP	Stormwater Activity	Description/Comments
5. Pollution Prevention/ Good Housekeeping for Municipal Operations	Prepare an Operation and Maintenance Program	Prepare the Operation and Maintenance program to include good housekeeping and pollution prevention practices for municipal type facilities on campus.	Continuation from Year 1.
		Circulate the program for internal review.	Continuation from Year 1.
		Finalize the program.	Continuation from Year 1.
	Fleet and Equipment Maintenance	Continue SPCC training program for all personnel working with oil and other petroleum products.	Continuation from Year 1.
		Continue with grit trap and oil/water separator cleanout annually at the Facilities garage.	Continuation from Year 1.
	Golf Course, Intramural Fields and Grounds Operations	Develop best management practices for a campus standard.	Continuation from Year 1.
		Update individual turf management plans to incorporate the standards.	New task for Year 2.
		Continue with licensed applicator required training and records retention.	Continuation from Year 1.

MCM(s)	BMP	Stormwater Activity	Description/Comments
	Inventory of Municipal Type Operations	Create an inventory of all municipal-type operations on campus. See also sections 6.2.1 and 6.2.2 of the SWMP. Update annually.	New task for Year 2.
		Conduct an assessment of each area to determine what BMPs can be put in place for pollution prevention/spill prevention.	New task for Year 2.
	Employee Training Program	Continue with licensed applicator required training and records retention.	Continuation from Year 1.
		Identify staff at municipal-type operations that will need training for good housekeeping and pollution prevention practices.	New task for 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__X__No

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

Not Applicable

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

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

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. Coordinating Education, Outreach and Public Participation efforts as appropriate with the City to maximize the program and cost-effectiveness of the required outreach.

Name and Explanation:

Name and Explanation:

Name and Explanation:

Name and Explanation:

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

___Yes__X__No

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

___Yes_____No

If 'Yes,' list all associated permit numbers and permittee names (add additional spaces or pages if needed):

Authorization Number: _____ Permittee:_____
Authorization Number: _____ Permittee: _____
Authorization Number: _____ Permittee: _____
Authorization Number: _____ Permittee: _____

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

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

___Yes__X__No

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

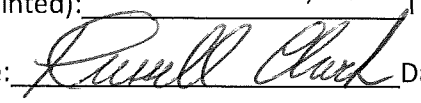
The number of municipal construction activities authorized under this general permit	
The total number of acres disturbed for municipal construction projects	
The number of construction projects in the jurisdiction of the MS4 where the permittee was not the construction site operator (as provided in submittals to the MS4 operator via notices of intent or site notices)	

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): Russell Clark, CSP Title: Director - EHSRM

Signature:  Date: November 25, 2014

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).

Attachment A: Narrative Provision

Introduction

This Annual Report satisfies the requirements of Part IV.B.2 of the TPDES Small MS4 General Permit TXR040000. Additional information is provided in this narrative section to supplement the data reported in Tables 1 and 2 of the TCEQ Standard Form No. 20561 for annual reporting.

MCM-1 Public Education, Outreach and Involvement

Acquire stormwater educational materials from EPA, TCEQ and other MS4s. Customize materials with local logos and contact information.

Various materials have been developed and used at events such as New Employee Orientation and University Seminar 1100. Materials have been developed for distribution and use during Year 2 public participation events such as the Curb Inlet Marker Installation and Arbor Day. We will continue developing materials for distribution that will contain a logo and tagline in order to brand our campaign and create a recognizable image people can connect to when they see our materials.

Provide basic stormwater pollution prevention awareness input into new employee and new student orientation.

Each new university employee must attend two part New Employee Orientation (NEO). NEO II is designed to include information and presentations from a variety of offices across to welcome employees, provide a basic understanding of university operations, benefits and participation opportunities associated with employment at Texas State University. A stormwater component has been added to the EHSRM office presentation. In addition, each new employee began receiving a take home stormwater educational material (shown below). This informational flier provides basic stormwater education, tips on how they can prevent stormwater pollution at home, and a list of places where they can dispose of hazardous and bulky waste so it does not enter the storm drains or drainage ways. **Table 6** is a summary of the staff trainings on stormwater awareness for Year 1.

STORMWATER AWARENESS TRAINING

What is stormwater?

Stormwater is rainwater that does not soak into the soil and grass, but, rather, runs off our streets, parking lots, and other concrete surfaces directly into our rivers and creeks untreated and unfiltered.

Where does it go?

Stormwater runoff flows to ditches and gutters, into storm drains and curb inlets which lead to underground piping that discharges directly into the nearest waterway. In our case, the stormwater ends up in Sessom Creek or the San Marcos River.

Why can this be bad?

Unfiltered stormwater runoff can pick up contaminates and bacteria along their way to the nearest waterway. These include but are not limited to:

- Oil and gasoline
- Fertilizers
- Pesticides
- Soil
- Grass clippings
- Trash
- Pet waste
- Cigarette butts

Why is this important?

The San Marcos River is our treasured water for recreation, but is also home to 5 threatened and endangered species. We must remember that we are swimming in these creatures' homes and we must learn how to live and recreate without disturbing the natural habitat.

WHAT GOES IN HERE ENDS UP HERE

IF IT'S ON THE GROUND IT'S IN OUR WATER

Reduce Your Waste!

The easiest reduce pollution in stormwater runoff is by not littering. If every person in San Marcos littered just one water bottle today, our city and river would be polluted with more than 50,000 pieces of trash! Not littering is a great way to reduce your waste, but recycling is another big component. Recycling your plastic, aluminum, and cardboard will decrease the amount going into our landfills daily.

Use Fertilizer/Pesticides Sparingly

When you overuse fertilizers and pesticides on your lawn, those leftover chemicals get washed down the storm drain and into the river when it rains. Limit your use to prevent stormwater runoff contamination.

Pickup after Your Pet

Picking up your pet's waste is not only a neighborly thing to do, but proper disposal of pet waste is a great way to keep harmful bacteria out of the rivers where we swim and where animals live.

HOW CAN YOU HELP?

Handy Information

Do your part by disposing of these materials properly so they don't end up in your gutters and curb inlets.

Household Hazardous Waste Drop-Off

Open Tuesdays and Fridays 12pm-3:30pm, City Hall Traffic Yard, entrance across from big HEB. *Photo courtesy of Wyatt McSpadden for the Edwards Aquifer Authority.*

Bulky Waste Pick-Up

WHAT? Pickup includes: furniture, large appliances and yard waste
WHEN? 1st and 3rd weeks of the month
HOW? Call TDS by 2pm the previous business day (800-375-8375)
WHO? Free to San Marcos utility customers only (4 times/year per resident)

Brush Drop-Off

WHAT? Material accepted: tree stumps, branches, leave and grass clippings (do not bag)
WHEN? 2nd Saturday of each month (8am-1pm)
WHERE? 750 River Rd. (behind animal shelter)
WHO? Open to San Marcos Residents only (bring your utility bill)

Public Participation Events

- Electronics Recycling Event – Each April
- River Clean-Up – Each March

To Report Spills

Texas State Environmental Health, Safety & Risk Management Office
Phone: (512) 245-3616 Website: www.fss.txstate.edu/ehsrm
City of San Marcos
Website: www.sanmarcostx.gov/SMTXConnect

Include pollution prevention and MS4 permit awareness messages in regularly published media such as newsletters, campus wide emails, web postings and electronic marquees.

Exceeded goal, not required until Year 2.

The Office of Community Relations at Texas State University emails their bi-monthly Volunteer Newsletter to approximately 1,646 students, staff and faculty bi-monthly. During Year 1, they incorporated several stormwater awareness messages into their newsletter as well as helped to promote events such as the San Marcos River Clean-Up and the Electronics Recycling Event. Over Year 1, Community Relations sent out four (4) stormwater awareness messages that were opened by recipients approximately 4,873 times. Below is an example of one of their newsletters with an incorporated stormwater awareness message.

TEXAS STATE
OFFICE OF COMMUNITY RELATIONS

Thursday, January 16, 2014

Greetings!

Thank you for your interest in volunteering in San Marcos! Here is a listing of events you can choose from.

Don't litter, it makes our waters bitter!

Pollution on our campus' streets, parking lots and grounds is washed by rain into storm drains, then directly to our drinking water supplies. Fertilizer, oil, pesticides, detergents, pet waste, grass clippings all end up in our water. So, let's focus on keeping our campus and our city clean by picking up trash. And if you see someone littering then say something.

Stay tuned for service opportunities to help support our clean water initiative.

Upcoming Volunteer/Service Opportunities

Select a new design for storm drain manhole covers.

The Manhole Cover Art Contest was part of a joint education effort between the City of San Marcos and Texas State University. These two entities worked together to raise awareness of residents and employees of the city, public school children, as well as students, faculty and staff of the university. The goal of this project was to increase public awareness that all storm drains lead to the river by designing a new storm drain manhole cover that differentiated the storm sewer system from the sanitary sewer system.

Photo Credit: Don Anders

Both Texas State University and the City of San Marcos have adopted this design and it will be incorporated on all new and replacement storm drain manhole covers. An example of the new Texas State University storm drain standard is included below.

Community Events

Texas State University was involved in several stormwater-based public outreach events during Year 1. The San Marcos River Clean-Up, Bobcat Build, Keep San Marcos Beautiful Adopt-a-Spot projects, and the Annual Electronics Recycling Event were some of the main projects. **Table 1** shows the quantitative data associated with each of the events.

San Marcos River Cleanup, March 1, 2014

The 29th Annual San Marcos River Cleanup brought out 227 volunteers including city officials, residents, as well as Texas State University students. Volunteers worked from 9 a.m. – noon and collected 4,023 pieces of trash and recyclables out of 13 areas in San Marcos, including parks, drainage channels, along the riverbanks and in the river via canoe. The most trash collected was plastic bottles, Styrofoam (cups and pellets) and plastic grocery or retail bags. A small group of Texas State University students were given verbal stormwater awareness training prior to cleanup.

Bobcat Build, March 29, 2014

Bobcat Build is a campus-wide annual service event in which Texas State University students help the San Marcos community by saying “Thank You!” for supporting the students and university. Students perform jobs for residents that range from yard work to house painting to a neighborhood cleanup. This year, the office of Environmental Health, Safety and Risk Management at Texas State University brought out a group from Bobcat Build to clean up the Texas State University Disc Golf course. The Phi Sigma Pi National Honor Fraternity brought out 45 members who spent three (3) hours picking up trash and recyclables along approximately two (2) miles of the Disc Golf Course. This group of students were given verbal stormwater awareness training prior to cleanup.

Electronics Recycling Event, April 26, 2014

Texas State University, the City of San Marcos and PSC Environmental Services (now Stericycle) hosted the sixth annual Electronics Recycling Event. Texas State University and PSC recruited 38 volunteers from the city, university, and PSC. These volunteers helped direct traffic, greet and survey the incoming cars, remove the end-of-life electronics from the vehicles, and pass out informational handouts with FAQs about recycling electronics and how they can affect stormwater runoff. During the event, 209 cars drove through the facility, dropping off a combined total of over 30,000 pounds of electronics, and were given 85 handouts about stormwater awareness and electronics recycling.

MCM-2 Illicit Discharge Detection and Elimination

Continue Hazardous Waste, Industrial Waste and Recycle Collection Program

The university has an active hazardous and industrial waste program, universal waste collection program (fluorescent bulbs), used oil and recyclable program for the campus labs, shops, classrooms and administrative offices. The collection, proper disposal and recycle of these materials potentially reduces the chances dumping or discharging to the environment and exposure to stormwater runoff. **Table 2** is a summary of the weights of these materials managed at the university for Year 1.

MCM-3 Construction Site Stormwater Runoff Control

Continue with Process of Reviewing Erosion Control Plans, SWPPP Drawing and Post Construction BMP Selection

The university has an existing program in place to review stormwater runoff control drawings and plans for all new construction and redevelopment projects that will include outside disturbance of soil. The goal for this BMP was to review completion of 75% of the projects initiated on campus meeting the outdoor work criteria. We exceeded this goal by reviewing 83% of all plans. The plan review table is too large to include in this report but it is readily available at the EHSRM office.

Continue with Existing Program of Site Inspections and Reporting on Once Acre and Larger Sites

The university has an active site inspection program for new construction that includes an initial startup inspection to ensure all notices are posted and submitted to the appropriate MS4 Operators, the SWPPP plan has been reviewed and certified and the erosion controls have been installed properly. This is approved jointly by the EHSRM and FPDC project managers prior to construction. During construction these two offices complete routine site inspections and complete inspection forms for documentation in compliance with the TPDES General Construction Permit (GCP) TXR150000. These continue until final stabilization of the site occurs as documented by the final site inspection, and the GCP is terminated by sending a copy of the Construction Site Notice to the MS4 operator. This process is applicable to only those sites that are one acre in size or larger. A summary of the initial, final and routine site inspections performed during Year 1 is shown in **Table 3**. Five active construction sites were ongoing in Year 1 of the permit and none were completed prior to this year-end reporting period.

Continue Attending Conferences and Training to Increase Skills and Knowledge of Construction Inspectors

Continuing education is an integral part of the university's mission of students, faculty and staff. It is recognized as important for maintaining licenses and specialty certifications, broadening the knowledge base of the stormwater team, allowing opportunities for idea sharing and collaboration with peers and coworkers and keeping the university staff familiar with new and emerging technologies and treatment methods. **Table 4** provides a summary of the training attended by the responsible departments during the first year of the permit cycle.

MCM-4 Construction Site Stormwater Runoff Control

Continue Compiling Information on the Locations and Kinds of Structural BMPs on Campus

Structural and natural BMPs have been included in new construction design for many years. An inventory of the existing BMPs was compiled as part of the SWMP preparation process. The BMP inventory list is too large to include in this report but it is readily available at the EHSRM office. This list is updated as new construction impacts them either by removal, replacement or as additional BMPs are added.

Perform O&M on Structural BMPs According to a Maintenance Schedule (Year 2 Goal)

Although this activity is not required until Year 2, several structural BMPs received maintenance as either existing initiatives or new work order requests. Tracking of BMP maintenance will be kept in the Facilities work order management (AiM) program so progress and weights can be tracked easily. **Table 5** shows the amount of material removed as maintenance of these units in Year 1.

MCM-5 Pollution Prevention/Good Housekeeping for Municipal Operations

Continue SPCC Training Program

SPCC training has been ongoing for 5-6 years and is an established program at the university. Training is done in December for the facilities shops and was expanded to other areas of campus in October 2014. For this reporting period, **Table 6** shows the number of employees trained in SPCC through the first year.

Continue Grit Trap and Oil/Water Separator Cleanout Annually

This activity was covered in **Table 5**.

Continue With Licensed Applicator Required Training

This activity was covered in **Table 4**.

Table 1
Summary of Public Participation Events
Year 1
Phase II MS4 Annual Report
Texas State University -San Marcos Texas

Name of Event	Date	Description of Event	Number of Participants	Quantity	Method Used for Stormwater Awareness
Art Competition	4-19-13 - 1-24-14	City and campus-wide art competition to design new storm drain manhole cover artwork	64	1 press release, 9 newspaper stories, three radio interviews	fliers, press releases and newspaper stories, public display of artwork on web sites and in Activity Center, radio talk shows
San Marcos River Cleanup	3/1/2014	Annual cleanup of litter from creeks, drainage channels and river	227	3 hours x 227 = 681 hours, 4023 pieces of trash, 13 areas cleaned	Small group training prior to the cleanup
Bobcat Build	3/29/2014	Cleanup of litter from Frisbee Golf Course	45	3 hours X 45= 135 hours	small group training - verbal with map
E-Recycling	4/26/2014	Annual collection event for end-of-life electronics	247 (209 cars, 38 volunteers)	33,700 lbs	SW Awareness brocures (85 passed out)
Bobcat Blend of Leaves	4/28/14 - 5/9/14	Collection of leaves and small leaf debris for composting at Bobcat Blend.	unknown	27 cy	Signage on the collection trailers
Keep San Marcos Beautiful	12/2013-8/2014		167	206 hours, 27 bags of trash, 21 bags of recycling	n/a

Table 2

Summary of Hazardous Waste and Recycle Volumes

Year 1

Phase II MS4 Annual Report

Texas State University -San Marcos Texas

Month		Batteries		Hazardous Waste	Fluorescent Bulbs	Used Oil	Recyclable Materials			Electronics Equipment
		Alkaline	Rechargables				Mixed Stream (a)	Cardboard	Paper	
		(pounds)	(pounds)	(tons)	(pounds)	(gal)	(tons)	(tons)	(tons)	(tons)
12/1/2013 (b)		0	0	see note	0	0	0	0	0	
Jan-14		0	58	see note	0	180	0	0	0	
Feb-14		0	26	see note	0	0	0	0	0	
Mar-14		783	32	see note	1260	0	0	0	0	
Apr-14		0	98	see note	0	0	0	0	0	15.29
May-14		400	37	see note	0	0	0	0	0	
Jun-14		0	42	see note	0	0	0	0	0	
Jul-14		300	36	see note	1850	0	0	0	0	
Aug-14		0	0	see note	0	0	159.39	94.29	17.66	
Total		1483	329	30 tons	3110	180	159.39	94.29	17.66	15.29

Notes:

(a) mixed stream is a combined weight of plastic, glass and aluminum

(b) beginning of the TCEQ Phase II General Permit

(c) beginning of the Texas State University fiscal year

(d) ending of the Texas State University fiscal year

Data for hazardous waste from Dec 2013 to August 2014 taken from the manifest table for the annual report.

Total for hazardous waste was 30 tons

Table 3

Summary of SWPPP Inspections

Year 1

Phase II MS4 Annual Report

Texas State University -San Marcos Texas

Month	Site	Initial Insp and Sign Off? Y/N	Routine SWPPP (a) Inspections	Final SWPPP Inspection
12/13/2013 (b)	West Campus Housing	Y	2	
Jan-14	West Campus Housing		4	
Feb-14	West Campus Housing		4	
Mar-14	West Campus Housing		3	
Apr-14	West Campus Housing		5	
May-14	West Campus Housing		4	
	Clear Springs Demo		4	
Jun-14	West Campus Housing		4	
	Clear Springs Demo	Y	3	
Jul-14	West Campus Housing		3	
	Clear Springs Demo		3	
	Comanche and Colony Demo	Y	3	
	Bobcat Trail	Y	1	
Aug-14	West Campus Housing		4	
	Clear Springs Demo		4	
	Comanche and Colony Demo		4	
	Bobcat Trail Utility Upgrade		4	
	San Saba and Canyon Hall Demo		2	
Total			**61**	

Notes:

(a) Stormwater Pollution Prevention Plan Inspection per the Construction General Permit TXR150000

(b) beginning of the TCEQ Phase II General Permit

(c) beginning of the Texas State University fiscal year

(d) ending of the Texas State University fiscal year

Table 4

Summary of Continuing Education Hours

Year 1

Phase II MS4 Annual Report

Texas State University -San Marcos Texas

Month	Event	Number of Attendees	Hours/each	Total Hours
12/1/2013	Pesticide Applicator Recertification	2	5	10
1/1/2014	Pesticide Applicator Recertification	2	5	10
2/28/2014	Pesticide Applicator Recertification	3	5	15
5/19/2014	TEEXS Stormwater Construction Activities Qualified Personnel	2	6	12
7/1/2014	Pesticide Applicator Recertification	1	8	8
7/18/2014	TEEXS Stormwater Construction Activities Qualified Personnel	1	6	6
7/31/2014	Pesticide Applicator Recertification	1	5	5
3/25/2014	Smart Grown Workshop	2	6	12
5/19/2014	TEEXS Qualified Construction Insp	1	6	6
7/22/2014	SWPPP Presentation - FPDC	7	1	7
7/25/2014	SWPPP Presentation-FPDC	8	1	8
7/28/2014-8/1/2014	EPA Region 6 Stormwater Conference	3	24	72
Total		**33**		**171**

Table 5

Post Construction BMP Maintenance

Year 1

Phase II MS4 Annual Report

Texas State University -San Marcos Texas

Month	Unit Name	Unit Number	Material Removed (pounds)	Contractor
12/19/2013	Speck Street Storm Trooper	ST-1-01	18,348	Gruene Environmental
12/19/2013	Matthew Street Garage Storm Trooper	ST-2-01	14,178	Gruene Enviornmental
12/19/2014	Grit Trap	GT-3-01	5,004	Gruene Environmental
12/19/2014	Oil Water Separator	OW-3-01	5,004	Gruene Environmental
8/29/2014	Bobcat Village Concrete Channel	CC-4-01	8520	Utility Operations Staff
Total		**5**	**51,054**	**=25 tons**

Table 6
Summary of Training - Staff
Year 1
Phase II MS4 Annual Report
Texas State University -San Marcos Texas

Month	Training							
	MS4 Program Awareness	General Awareness	IDDE	GH/PP (a)	Construction	SPCC (b)	NEOII	US1100
12/13/2013 (c)	-	-	-	-	-	112	26	-
Jan-14	-	-	-	-	-	-	18	53
Feb-14	-	-	-	-	-	-	22	-
Mar-14	-	-	-	-	-	-	28	-
Apr-14	-	-	7	-	-	-	20	127
May-14	-	-	-	-	-	-	14	38
Jun-14	15	11	-	-	-	-	24	-
Jul-14	73	-	-	-	15	-	26	-
8/31/2014 (d)	15	-	-	-	-		22	-
Total	**103**	**11**	**7**	**0**	**15**	**112**	**200**	**218**

Notes:
(a) GH/PP = Good Housekeeping/Pollution Prevention
(b) SPCC = Spill Prevention Control and Countermeasures
(c) beginning of the TCEQ Phase II General Permit
(d) end of the Texas State fiscal year