

CITY OF HEATH

2018 STORMWATER MANAGEMENT PROGRAM

PUBLIC WORKS DEPARTMENT

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EXECUTIVE SUMMARY

The TCEQ has issued TPDES General Permit No. TXR040000 for small municipal separate storm sewer systems for the discharge of stormwater into waters of the State. This Stormwater Management Program identifies the activities to be performed by the City of Heath over the course of the 5-year permit term to achieve compliance with the permit requirements. The TCEQ has identified six (6) minimum control measures that must be addressed. These are 1) Public Education, Outreach, and Involvement 2) Illicit Discharge Detection and Elimination, 3) Construction Site Stormwater Runoff Control, 4) Post-Construction Stormwater Management in New Development and Redevelopment, 5) Pollution Prevention and Good Housekeeping for Municipal Operations and 6) Industrial Stormwater Sources. The City has identified best management practices that will be implemented to improve stormwater quality for each of the six minimum control measures. Measurable goals, schedules, and responsibilities for each best management practice are indicated in the program.

1.0 INTRODUCTION

1.1 General

The Commissioners of the Texas Commission on Environmental Quality (TCEQ) approved issuance of the Texas Pollution Discharge Elimination System (TPDES) General Permit No. TXR040000 on December 13, 2013 (included in Appendix A) to supersede the permit issued on August 13, 2007. The permit has been issued pursuant to Section 26.040 of the Texas Water Code and Section 402 of the Clean Water Act. The permit provides for the discharge of surface water in the state by small municipal separate storm sewer systems (MS4's) that are located in urbanized areas in accordance with the monitoring requirements and other conditions as set forth by the permit as well as the rules of the Texas Commission on Environmental Quality (TCEQ) and the State of Texas.

The U.S. Bureau of Census has identified the City of Heath (City) as being located within an "urbanized area" and the City is therefore required to obtain authorization for the discharge of stormwater runoff. The City conforms to the above definition of a MS4 and is thereby eligible for authorization of discharge by the general permit.

1.2 Authorization

To obtain permit coverage for stormwater discharges, the City must submit a Notice of Intent (NOI) and a Stormwater Management Program (SWMP) to the TCEQ. A copy of the NOI is found in Appendix B. Once approved, the permit will be issued for a period of five (5) years. And although the permit includes an option for a waiver, the City of Heath does not qualify.

1.3 Compliance

It is the intention of the City of Heath to comply with the TCEQ permit requirements. This Stormwater Management Program represents the City's strategy to reduce pollution of stormwater to maximum extent practical and comply with the general permit. As required by the permit conditions, this SWMP addresses the actions that the City will implement over the course of the permit term in regard to the six (6) minimum control measures as required by the permit.

2.0 MINIMUM CONTROL MEASURES

As previously indicated, the six minimum control measures (MCM) to be addressed by the City of Heath are as follows:

1. Public Education, Outreach, and Involvement
2. Illicit Discharge Detection and Elimination
3. Construction Site Stormwater Runoff Control
4. Post Construction Stormwater Management in New development and Redevelopment
5. Pollution Prevention/Good Housekeeping for Municipal Operations
6. Industrial Stormwater Sources

Best management practices (BMPs) and measurable goals have been developed for each of these six MCMs. As required by the permit, the BMPs have been identified and selected in an effort to minimize stormwater pollution to the maximum extent practical. Also, a schedule for the development and implementation of each BMP activity has been established. Measurable goals for each BMP have been determined to indicate how the BMPs will contribute to the improvement of stormwater quality.

The program has been written to provide an interlacing between the BMPs. Therefore, several of the BMPs to be implemented by the City will help achieve compliance for more than one of the MCMs. In the BMP tables shown below for each MCM, the items that apply to more than one MCM are so noted.

3.0 Public Education, Outreach and Involvement

This minimum control measure entails a public education program created to distribute educational materials to the community to facilitate awareness, understanding, and support of environmental management strategies aimed at improving stormwater quality. Since the City of Heath is located on the shores of Lake Ray Hubbard which is a prime recreation area as well as a water supply reservoir, the goals and objectives of the program are to contribute to the maintenance of the water quality of Lake Ray Hubbard as well as downstream areas in the Trinity River Basin. The City will make an effort to inform residents, visitors, employees, businesses, commercial facilities, and industrial facilities of the impacts of stormwater pollution. Through a broad range of dissemination efforts, the City is assured that a diverse range of audiences will be appropriately informed.

Many of the BMPs will require coordination and partnerships with other local governments and nonprofit organizations such as the North Central Texas Council of Governments (NCTCOG).

3.1 Current Programs

The City of Heath provides general public education to residents on a variety of subjects by posting information in the Heath Newsletter, a local quarterly publication, distributing information to local schools, and maintaining a City web site. Prior to this permit an official program has been established under the previous permit wherein the City is been involved with some activities that are conducive to public stormwater awareness. The City has taken an interest in and encourages groups like the Environmental Club at the local high school. As this SWMP is implemented, the current programs will continue with emphasis placed on stormwater quality.

3.2 Selected BMPs for Public Education, Outreach and Involvement

Shown below are the Best Management Practices that the City has identified as programs to be implemented for this minimum control measure.

A. *BMP 1 — Public Education*

The City must educate the public on day-to-day activities that are contributors of source pollutants. The City currently provides on its website a listing of businesses and locations that will accept used automotive fluids. The City currently distributes City of Heath General Information Packets detailing information that is prudent to all citizens. The General Information Packets should also include Texas SmartScape data. Flyers should be mailed annually detailing the activities and materials of this BMP and links should be either updated or established on the City website to display this information. This BMP will also provide topics to be discussed and addressed in all other Public Education BMPs. The City will distribute stormwater quality guidance materials to each existing business and information packets will be distributed to new businesses with their Certificate of Occupancy (CO) or with change of ownership.

1) Measurable Goals

The measurable goals for implementation of this BMP are list as activities in the following table.

2) Schedule

Program	BMP	Activity	Due Date
Public Education, Outreach and Involvement	Public Education	1. Mail flyers annually describing activities.	Years 1-5
		2. Update or establish website links.	Years 1-5
		3. Post brochures at City Hall.	Years 1-5
		4. Post fact sheets City Hall.	Years 1-5
		5. Update General Information Packets to include Texas SmartScape and stormwater quality information.	Years 1-5
		6. Post web address for stormwater web page on water bills once per year.	Years 1-5
		7. Distribute stormwater quality guidance materials annually to existing businesses. (Public Education)	Years 1-5
		8. Distribute stormwater management packets for new businesses with CO or change of ownership. (Public Education)	Years 1-5

3) Responsible Persons

The Public Works Department will be responsible for implementation of this BMP in accordance with the above schedule.

B. BMP 2- Maintain Partnerships

Because of the vast majority of programs currently available through outside sources and limited City resources for funding stormwater education, the City will work to maintain partnerships with other local governments, community organizations, and local businesses. The combined efforts of these groups will help the City educate its residents and businesses in stormwater topics. Partnerships with organizations such as the NCTCOG will help to provide resources such as the “Preventing Stormwater Pollution: What Can We Do” video and training module series. The resources obtained from partnerships can be used to provide information through media sources other than brochures and pamphlets, such as public broadcast channels and newspaper articles. Web site links and information from these partnerships should be placed on the City web site. The local high school has an Environmental Club that the City firmly supports. The City will continue to encourage this group and promote new programs to the schools such as the use of Green Teacher, a magazine written by educators to help educators enhance environmental education across the curriculum for all grade levels. It is the stance of the City to support the school district's stormwater education efforts, not to dictate what programs and materials to be used. Establishing a strong relationship with the school district is the most important part of the

Children's Education Programs since the City will ultimately rely on the schools to present awareness messages. The City will make stormwater presentations at the local schools.

1) Measurable Goals

The measurable goal for implementation of this BMP is to maintain working relationships with governments, organizations, and businesses who come together to promote stormwater quality awareness. Development and implementation will be according to the schedule below.

2) Schedule

Program	BMP	Activity	Due Date
Public Education, Outreach and Involvement	Maintain Partnerships	1. Publish stormwater related articles periodically in the <i>Heath Newsletter</i> .	Years 1-5
		2. Provide links and information about partnerships on City website.	Years 1-5
		3. Encourage and promote programs related to stormwater awareness at schools.	Years 1-5
		4. Present stormwater talks at public schools.	Years 1-5

3) Responsible Persons

The Public Works Department will be responsible for contacting and building relationships with organizations that will help educate the public.

C. BMP 3- Participate in Community Events

The City has determined it must participate in community events to raise awareness of stormwater issues. Participation in community events will be integrated into existing activities such as the annual 5-K run, sporting events, and festivals. The City will setup and run an information booth at community events. Promotional items will be given away at these events to promote awareness.

1) Measurable Goals

The measurable goal for implementation of this BMP is to participate in enough community events so that awareness of stormwater issues increases. Development and implementation will be according to the schedule below.

2) Schedule

Program	BMP	Activity	Due Date
Public Education, Outreach and Involvement	Participate in Community Events	1. Update booth to display materials and brochures at public events. (Public Involvement)	Years 1-5
		2. Provide promotional items with stormwater logo at non-City sponsored events. (Public Involvement)	Years 1-5

3) Responsible Persons

The Public Works Department will be responsible for ensuring that the City participates in community events to further educate the public on stormwater quality.

D. BMP 4 – Maintain a Library of Materials

The City will provide an area at City Hall for maintaining and displaying a library of materials related to stormwater quality. This area will include much of the same educational material that is distributed in other Public Education BMPs. It will be updated periodically to stay current as the City implements other BMPs. When completed, this will be a place where students can visit to prepare reports and individuals can obtain information. It will also be a place that will be helpful for organizations to gather information for presentations.

1) Measurable Goals

The measurable goal for implementation of this BMP is to acquire stormwater related educational materials and maintain a single location for the public to access these materials. Development and implementation will be according to the schedule below.

2) Schedule

Program	BMP	Activity	Due Date
Public Education, Outreach and Involvement	Maintain a Library of Materials	1. Set-up library of materials area at City Hall.	Years 1-5
		2. Provide access to material for interested groups.	Years 1-5

3) Responsible Persons

The Public Works Department will locate a place to display stormwater related information.

E. BMP 5- Install Stormwater Signage

The City has determined that the installation of stormwater signage will help educate the public of critical areas susceptible to stormwater pollution. It may also deter illegal dumping. Stickers promoting stormwater awareness will also be distributed to contractors and civic groups (Boy Scouts, Girl Scouts, etc.) to mark storm drains and inlets. With the help of local Boy Scout troops, the City has marked the majority of its existing storm drains and inlets. The City will require all new storm drains and inlets to be marked on completion of construction.

1) Measurable Goals

The measurable goal for implementation of this BMP is to install signage at appropriate public locations and mark all of the City's new storm drains and inlets over the course of the permit term. Development and implementation will be according to the schedule below.

2) Schedule

Program	BMP	Activity	Due Date
Public Education, Outreach and Involvement	Install Stormwater Signs	1. Require new storm drains and inlets to be marked upon completion of construction.	Years 1-5
		2. Distribute sticker markings to contractors and civic groups to mark storm drains and inlets.	Years 1-5

3) Responsible Persons

The Public Works Department will be responsible for installing stormwater signs along creeks and storm drains and distributing logo stencils.

F. BMP 6- Enlist Volunteers

Because the stormwater management program is such a widespread plan and the City has limited resources to carry out all of the program elements, the City will rely on the help of volunteers. The City will rely on these volunteers to educate others and to develop and implement various programs. The City will target civic groups such as the Boy Scouts and Girl Scouts to locate volunteers. The City will present annual information sessions to these civic organizations focusing on the importance of stormwater quality and their responsibility to help obtain a high water standard. The activities listed below are public participation projects utilizing volunteers.

1) Measurable Goals

The measurable goal for enlisting volunteers is to locate and recruit enough public support and volunteers to carry out the various activities given for the BMPs. Implementation will be according to the schedule below.

2) Schedule

Program	BMP	Activity	Due Date
Public Education, Outreach and Involvement	Enlist volunteers	1. Promote resident participation in annual Hazardous Waste Collection day.	Years 1-5
		2. Storm drain and inlet marking using Boy Scouts.	Year 5
		3. Conduct annual presentations to civic organizations.	Years 1-5
		4. Find volunteers to staff stormwater booths at public events- National Night Out, 4th of July celebration, etc. (Public Education)	Years 1-5
		5. Establish annual park clean-up programs.	Years 1-5
		6. Find civic organizations to distribute stormwater information. (Public Education)	Years 1-5
		7. Establish community clean-ups programs.	Years 1-5

3) Responsible Persons

The Public Works Department will be responsible for locating, encouraging, and enlisting volunteer support of the stormwater management program.

4.0 Illicit Discharge Detection and Elimination

The objective of illicit discharge detection and elimination is to determine the types and sources of illicit discharges entering the storm drain system and to establish the legal, technical, and educational means needed to eliminate these discharges. Illicit discharges are any discharges not composed entirely of stormwater. The following non-stormwater sources may be discharged and are not required to be addressed in the Illicit Discharge and Detection or other minimum control measures, unless they are determined by the permittee or the TCEQ to be significant contributors of pollutants, or they are otherwise prohibited by the City:

1. Water line flushing (excluding discharges of hyperchlorinated water, unless the water is first dechlorinated and discharges are not expected to adversely affect aquatic life);
2. Runoff or return flow from landscape irrigation, lawn irrigation, and other irrigation utilizing potable water, groundwater, or surface water sources;
3. Discharges from potable water sources that do not violate Texas Surface Water Quality Standards;
4. Diverted stream flows;
5. Rising ground waters and springs;
6. Uncontaminated ground water infiltration;
7. Uncontaminated pumped ground water;
8. Foundation and footing drains;
9. Air conditioning condensation;
10. Water from crawl space pumps;
11. Individual residential vehicle washing;
12. Flows from wetlands and riparian habitats;
13. Dechlorinated swimming pool discharges that do not violate Texas Surface Water Quality Standards;
14. Street wash water excluding street sweeper waste water;
15. Discharges or flows from emergency fire fighting activities (fire fighting activities do not include washing of trucks, run-off water from training activities, test water from fire suppression systems, and similar activities);
16. Other allowable non-stormwater discharges listed in 40 CFR § 122.26(d)(2)(iv)(B)(1);
17. Non-stormwater discharges that are specifically listed in the TPDES Multi Sector General Permit (MSGP) TXR050000 or the TPDES Construction General Permit (CGP) TXR150000;
18. Discharges that are authorized by a TPDES or NPDES permit or that are not required to be permitted; and
19. Other similar occasional incidental non-stormwater discharges such as spray park water, unless the TCEQ develops permits or regulations addressing these discharges.

Implementation of this minimum control measure will require both technical and legal staff working in cooperation to develop the appropriate means and methods.

4.1 Current Programs

The City of Heath currently has the established program for detecting illicit discharges developed under the previous permit and has several ordinances and Developer Agreements to eliminate illicit discharges.

4.2 Selected BMPs for Illicit Discharge Detection and Elimination

Shown below are the best management practices that the City has identified as programs to be implemented for this minimum control measure.

A. *BMP 1 - Storm Sewer Mapping*

The City will continue developing a storm sewer system map, showing the location of all outfalls and the names and locations of all waters of the U.S. that receive discharges from those outfalls. This system will be based on field surveys and construction drawings. As the City progresses, this mapping system will be tied to a Geographic information System (GIS) system.

1) Measurable Goals

The measurable goal for implementation of this best management practice is to update the map the entire existing drainage system while integrating new development as it is built. The GIS mapping system should be finished by the end of the permit term. Development and implementation will be according to the schedule below.

2) Schedule

Program	BMP	Activity	Due Date
Illicit Discharge Detection & Elimination	Storm Sewer Mapping	1. Continue developing an MS4 map identifying all outfall locations and names and locations of all U.S. waters receiving discharges from those outfalls.	Years 1-5

3) Responsible Persons

The Public Works Department will be responsible for creating a stormwater system map.

B. *BMP 2- Education and Training*

The appropriate City staff will need to be trained on signs of illicit discharges as well as the appropriate response to observations. Water quality observation cards will be carried in City vehicles to reinforce training. Visual observations made lead to further examinations including lab testing.

1) Measurable Goals

The measurable goal for implementation of this BMP is to conduct training of City staff.

2) Schedule

Program	BMP	Activity	Due Date
Illicit Discharge Detection & Elimination	Education and Training	1. Develop training materials and water quality observation cards for City Staff.	Years 1-5
		2. Conduct annual training of staff.	Years 1-5

3) Responsible Persons

The Public Works Department will be responsible for ensuring that these activities are completed.

C. BMP 3 – Detect Non-Stormwater Discharges

The City will continue the program to detect non-stormwater discharges entering the storm sewer system. Existing resources or programs must be reviewed to determine their level of success and possible changes that would increase their efficiency. Available educational and emergency response resources should be assessed as well. Financial resources and fiscal planning requirements must also be reviewed. The review should not only include City resources, but should also explore the possibility of integrating resources from neighboring jurisdictions, volunteers, and other agencies. When developing new programs, the City must establish who will be responsible for administration, what legal authority the City has, and how to track detected illegal discharges and follow up elimination activities. It is critical that a program manager develop achievable, measurable illicit discharge detection and elimination program goals. Visual observations will likely be the basis for much of the detections. A log of public complaints and/or concerns will be maintained by the Public Works Department. The log will be reviewed by appropriately trained staff and inspections will be performed on the complaints that are viewed as potential illicit discharges.

1) Measurable Goals

The measurable goal for implementation of this BMP is to identify program requirements and resource and training needs. Implementation of the activities will be according to the schedule below.

2) Schedule

Program	BMP	Activity	Due Date
Illicit Discharge Detection & Elimination	Detect Non-Stormwater Discharges	1. Maintain public complaint and/or concern log and perform inspections on 75% of log entries determined to be potential illicit discharges.	Years 1-5
		2. Provide training for field-based staff with water quality observation cards to be carried in each City vehicle.	Years 1-5
		3. Develop written procedures and documentation for responding to complaints and violations noted on City observation cards.	Year 1
		4. Enforce inspection program and enforcement protocol to address illegal dumping by random inspections of areas likely to receive illicit discharges.	Years 1-5

3) Responsible Persons

The Public Works Department will be responsible for implementing this BMP. This department will work in conjunction with various other departments to ensure effective detection.

D. BMP 4- Eliminate Illicit Discharges

The City will continue the goal of eliminating all illicit discharges entering waterways and enforcing proper disposal of materials determined to lead to stormwater pollution. Once an illicit connection/discharge has been identified and verified, the City will notify the owner in writing and direct them to eliminate the illicit connection/discharge within a specified time frame. The time frame for eliminating the connection/discharge will depend on the type of illicit connection/discharge and how difficult elimination will be. The City will follow up with the owner to ensure that the connection/discharge has been eliminated. If the connection has not been eliminated, the City will enforce its ordinances to obtain compliance.

1) Measurable Goals

The measurable goal for implementation of this BMP is to eliminate illicit discharges entering the storm sewer system. Implementation of the activities will be according to the schedule below.

2) Schedule

Program	BMP	Activity	Due Date
Illicit Discharge Detection & Elimination	Eliminate Illicit Discharges	1. Continue illicit discharge program with planned actions for eliminating discharge within a specific time frame.	Years 1-5
		2. Notify owner of illicit discharge within two weeks of determination of discharge detailing requirements of removal of discharge and potential penalties for non-compliance.	Years 1-5
		3. Track and document investigations of illicit discharges.	Years 1-5

3) Responsible Persons

The Public Works Department will be responsible for implementing this BMP. This department will work in conjunction with various other departments to ensure effective detection.

5.0 Construction Site Stormwater Runoff Controls

The objective of construction site stormwater controls is to enable the City to effectively control construction site discharges into its storm sewer system. The City has adopted the NCTCOG integrated Stormwater Management (iSWM) Design Manual for Construction for their construction stormwater management requirements. The iSWM Design Manual for Construction contains detailed guidance for the planning, design, installation, and maintenance of BMPs to reduce the release of sediment and other pollutants from construction activities. Information on conducting a site assessment and on protection of identified sensitive environmental areas during construction is contained in the document. Checklists are provided to ensure that stormwater pollution prevention plans (SWP3s) meet both the requirements of the TPDES Construction General Permit and the iSWM Design Manual for Construction. Implementation of this minimum control measure will require both technical and legal staff working in cooperation to develop the appropriate means and methods. This MCM will also take time for local builders to become familiar with more stringent criteria.

5.1 Current Programs

Although not specifically designed to prohibit pollution of stormwater runoff, the City currently has an Erosion Control Ordinance and various policies regarding construction in place, which were discussed briefly above. These ordinances and policies will be revised as necessary to more directly govern stormwater pollution.

5.2 Selected BMPs for Construction Site Stormwater Controls

Shown below are the best management practices that the City has identified as programs to be implemented for this minimum control measure.

A. *BMP 1 -Policies*

The City has existing ordinances and design standards that require erosion and sediment controls at construction sites that comply with the requirements of this MCM. The City requires site plan review of development plans to include a SWP3 and NOI. One such requirement is to require the usage of the NCTCOG iSWM Design Manual for Construction. The policies prohibit all non-stormwater discharges, sediment, trash, and debris from leaving construction sites. The City requires all construction sites to post a no-littering sign with bilingual information. The signs are given out by the City with permits. Policies requiring a grading permit for any earth disturbing or filling activities have been established. These ordinances are reinforced during required preconstruction conferences. Contractors are reminded that discharges of wash-out wastewater, fuels, oils, soaps, solvents and dewatering activities are prohibited. The City also holds retainage on capital improvement projects to cover the cost of restoration of a site if the contractor defaults on a project. The City has developed enforcement mechanisms that are used to improve compliance like Notices of Violation, administrative fines, civil penalties, criminal penalties, etc. An educational program is used to introduce or remind contractors of the requirements of the policies relating to stormwater runoff control. The City feels that it has the appropriate

ordinances already in place concerning construction site stormwater controls and, as such, there is little need for action concerning this BMP. The City does, however, recognize the possible necessity of redefining its current ordinances or developing new ordinances as the City continues to grow. The City will have to continually monitor its current policies ensuring their effectiveness.

1) Measurable Goals

The measurable goal for implementation is to monitor existing policies with the objective to improve stormwater quality.

2) Schedule

Program	BMP	Activity	Due Date
Construction Site Stormwater Runoff Controls	Policies	1. Monitor existing policies and ordinances to ensure stormwater quality.	Years 1-5
		2. Distribute educational program for contractors.	Years 1-5
		3. Review site plans to ensure compliance with waste control and erosion and sediment control policies.	Years 1-5
		4. Train appropriate staff to review construction site plans prior to construction.	Years 1-5
		5. Require annual meetings to educate inspectors involved in construction site review.	Years 1-5
		6. Ensure that all construction activities have developed and implemented an SWP3.	Years 1-5

3) Responsible Persons

The Public Works Department and Building Inspections Department will work in conjunction to ensure these actions are followed.

B. BMP 2 – Construction Site Inspections

The City will verify that builders comply with City ordinances and policies regarding stormwater quality during construction and ensure construction sites are being developed as they were approved. Random construction site inspections will be performed by City inspectors on construction sites meeting the requirements of CFR 122.34 (B) (4). The City will also take into consideration input and complaints from the general public concerning environmental issues of active construction projects. The Building Inspections Department will maintain a log for public complaints and/or concerns and inspectors will review the legitimacy of the log entry and determine the proper course of action. Inspections will be made on the appropriate sites based on public concern. Contractors

found to not be in compliance with the appropriate ordinances and policies will be subject to penalties based on the severity of the issues of non-compliance.

1) Measurable Goals

The measurable goal for this BMP is to enforce ordinances and policies concerning construction site requirements during active construction and ensure construction sites are being developed as they were approved.

2) Schedule

Program	BMP	Activity	Due Date
Construction Site Stormwater Runoff Controls	Construction Site Inspections	1. Review public complaint log within one month of complaint being issued	Year 1 - 5
		2. Respond to 50% of public complaints within one month of complaint review	Year 1 - 5
		3. Perform construction site inspections annually on 50% of active construction projects	Year 1 – 5
		4. Provide written reports of construction site inspections	Year 1 – 5

3) Responsible Persons

The Public Works Department and Building Inspections Department will work in conjunction with the Code Enforcement Department to ensure these activities are implemented.

6.0 Post-Construction Stormwater Management in New Development and Redevelopment

This minimum control measure entails best management practices aimed at preventing stormwater pollution once construction has been completed. Such practices include placing requirements on the redevelopment of a property, providing open spaces throughout the City, and the use and maintenance of structural controls. The overall intent is to reduce the effects of development by limiting sediment and chemicals in runoff and by decreasing runoff flow.

6.1 Current Programs

The requirements for post-construction practices are very similar to that of the construction practices. The City requires the continued maintenance of construction sites by the developer or contractor after their completion. This requires that measures be taken during the construction process to limit stormwater concerns for the post-construction phase of a project.

6.2 Selected BMPs for Post Construction Stormwater Management for New Development/ Redevelopment

Shown below are the best management practices that the City has identified as programs to be implemented for this minimum control measure.

A. BMP 1 – Regulation of Redevelopment

The City has programs in place to control the redevelopment of a site. This program includes guidelines similar to those required for initial development projects. Such requirements include the submission of a narrative description of the proposed work, review of an SWP3, and analysis of existing and proposed hydrologic conditions. As with other commercial development, redevelopment projects are required to stay within the maximum percentage of impervious coverage of the site leaving the remainder of the site landscaped. Also, the City encourages clearing and grading to be held to the minimum amount necessary. The City will review its zoning policies and modify or adopt new policies to ensure stormwater quality. These requirements along with others as discussed above in the Construction Site Stormwater Controls section will help minimize the impacts of the redevelopment of a site. The program will be integrated into the existing site plan review and building inspection processes. All construction sites subject to review prior to City approval.

1) Measurable Goals

The measurable goal for implementation of regulation for redevelopment is to monitor existing programs and policies throughout the permit term ensuring their effectiveness. Development and implementation will be according to the schedule below.

2) Schedule

Program	BMP	Activity	Due Date
Post Construction Controls for New Development/ Redevelopment	Regulation of Re-development	1. Monitor the effectiveness of existing programs and policies.	Years 1-5
		2. Update existing or implement new programs and policies as necessary to best control the effectiveness of post-construction stormwater control best management practices.	Years 1-5

3) Responsible Persons

The Public Works Department will work in conjunction with the Building Inspections Department to implement this BMP.

B. BMP 2- Structural Controls

Structural controls such as detention ponds and retention ponds have previously been looked at to control runoff volume. However, the City now recognizes that these controls also impact stormwater pollution. A procedure for evaluating the need for structural controls to improve stormwater quality will be established. Infiltration systems, porous pavement systems, constructed wetland systems, and grass filter strips should all be considered. Also, guidelines for the inspection and maintenance of these controls will be instituted. Most existing structures are on development properties and are not City-owned. The City will consider the effects of requiring developers to maintain these structures.

1) Measurable Goals

The measurable goal for implementation of this BMP is to establish the procedures and guidelines discussed above for improving stormwater quality by use of structural controls. Development and implementation will be according to the schedule below.

2) Schedule

Program	BMP	Activity	Due Date
Post-Construction Controls for New Development/ Redevelopment	Structural Controls	1. Establish guidelines for inspection and maintenance of structural controls.	Years 1-5
		2. Develop a list of appropriate penalties for contractor in non-compliance based on severity of issue and multiple offenses.	Years 1-5

3) Responsible Persons

The Public Works Department will work in conjunction with the Planning and Development Department to ensure implementation of this BMP.

7.0 Pollution Prevention and Good Housekeeping for Municipal Operations

This minimum control measure requires the City to examine and modify their own actions to help ensure a reduction in the amount and type of pollution. City actions to be considered may include maintenance and cleaning of streets and parking lots, protection of open spaces, orderliness of storage and maintenance areas, and conditions of storm sewer systems. By focusing on its own operations, the City will set the example for residents, businesses, and construction sites in improving stormwater quality.

7.1 Current Programs

While the City of Heath makes a significant step towards keeping their facilities and sites clean and orderly, there is no individual program that requires pollution prevention or good housekeeping by City staff.

7.2 Selected BMPs for Municipal Operations

Shown below are the best management practices that the City has identified as programs to be continued for this minimum control measure.

A. BMP 1 – Maintenance Activities, Schedules, and Inspection Procedures

The City has determined that it should address maintenance activities, schedules, and inspection procedures as a part of this SWMP. The City already has several such measures in place. There is a regularly scheduled maintenance program for all City vehicles. Inventory is taken for all City facilities at risk for spills and these facilities are continually monitored and all hazardous substances at these facilities are tracked. No pesticides or herbicides are stored at City facilities and a professional is contracted when spraying is necessary. Sanitary sewer lines are maintained including visual inspection and cleaning. Current maintenance policies and programs can be revised to include considerations for pollutant discharge.

1) Measurable Goals

The measurable goals for implementation of this BMP is the development of schedules and policies for maintenance activities to improve the quality of stormwater runoff. Development and implementation will be according to the schedule below.

2) Schedule

Program	BMP	Activity	Due Date
Pollution Prevention/ Good Housekeeping For Municipal Operations	Maintenance Activities, Schedules, & Inspection Procedures	1 Develop and maintain an inventory of facilities and stormwater controls owned by the City.	Years 1-5
		2. Continue program to clean accumulated trash and debris from catch basins and storm drain systems on regular basis.	Years 1-5
		3. Perform vehicle and equipment maintenance at a Public Works facility, away from drains and under covered structures.	Years 1-5

3) Responsible Persons

The Public Works Department will be responsible for the implementation of these activities.

B. BMP 2- Controls for Reducing Discharge of Pollutants

The City can install and/or utilize various devices to effectively reduce the discharge of pollutants. The schedule below will be followed as closely as possible, but acquisition of these devices will be contingent upon availability of funding.

1) Measurable Goals

The measurable goal for implementation of this BMP is to acquire and install appropriate devices as described below to reduce the discharge of pollutants. Implementation will be according to the schedule below.

2) Schedule

Program	BMP	Activity	Due Date
Pollution Prevention/ Good Housekeeping For Municipal Operations	Controls for Reducing Discharge of Pollutants	1. Control litter by sweeping and picking up trash around public buildings.	Years 1-5
		2. Use secondary containment measures for waste storage areas.	Years 1-5
		3. Continue spill response plan at all City facilities.	Years 1-5
		4. Provide spill containment and clean-up kits at City facilities. Also provide training for appropriate employees.	Years 1-5
		5. Do not store stockpile materials that could cause stormwater pollution.	Years 1-5

3) Responsible Persons

The Public Works Department will be responsible for the implementation of these activities. Other departments such as Building Inspections and Parks and Recreation may be involved in these activities as well.

C. BMP 3- Proper Waste Disposal

To demonstrate to the public that it is committed to reducing stormwater pollution, the City will dispose of waste materials properly and utilize programs available to all residents. Programs may include participation in hazardous waste collections or recycling. Some recycling programs are already in operation. Current programs will be maintained.

1) Measurable Goals

The measurable goal for implementation of proper waste disposal is to produce a cleaner environment among City facilities. Implementation will be according to the schedule below.

2) Schedule

Program	BMP	Activity	Due Date
Pollution Prevention/ Good Housekeeping For Municipal Operations	Proper Waste Disposal	1. Keep outside areas such as dumpsters and parking lots free of trash and debris.	Years 1-5
		2. Properly contain and dispose of cleaning materials (rags, towels, absorbent materials, etc.).	Years 1-5
		3. Maintain recycling program for City operations.	Years 1-5

3) Responsible Persons

The Public Works Department will be responsible for the implementation of these activities.

D. BMP 4- Contractor Requirements and Oversight

Contractors hired by the City to perform maintenance activities on City facilities will be required to comply with all of the stormwater control measures, good housekeeping practices, and facility specific stormwater management operating procedures. Oversight of these contractors will be provided to ensure that appropriate stormwater control measures are being followed.

1) Measurable Goals

The measurable goal for implementation of contractor requirements and oversight is to develop consistent procedures on all City facilities for stormwater control. Implementation will be according to the schedule below.

2) Schedule

Program	BMP	Activity	Due Date
Pollution Prevention/ Good Housekeeping For Municipal Operations	Contractor Requirements and Oversight	1. Develop standard clauses for all maintenance contracts.	Years 1
		2. Incorporate standard in all new contracts.	Years 1-5
		3. Provide oversight of maintenance contractor's procedures and operations on City facilities.	Years 1-5

3) Responsible Persons

The Public Works Department will be responsible for the implementation of these activities.

E. BMP 5- City Employee Training and Education

City employee training programs are designed to teach staff about potential sources of stormwater contamination and ways to minimize the water quality impact of municipal activities, such as the topics previously discussed in this SWMP. Training programs include a general stormwater awareness message, pollution prevention/good housekeeping measures, spill response and prevention, and information about the operation and maintenance of BMPs. Training programs include information on SWPPPs for municipal facilities and BMPs recommended for use in the field to prevent contaminated discharges. City staff should be trained to recognize and report illicit discharges. City employees involved in potentially polluting activities should receive both general stormwater and targeted BMP training tailored to their activities. This will increase the likelihood that receiving waters and the storm drain system will be protected from inadvertent discharges and spills. The training

programs for field maintenance staff will address safety, materials handling, waste disposal, or other issues. The training format will include formal, classroom style programs that are held on an annual basis. More comprehensive training will be conducted when a new employee is hired. Whenever possible, additional in-field training will be provided to demonstrate proper implementation of operation and maintenance of BMPs and housekeeping measures at municipal facilities. After training, managers will periodically check employee work practices to ensure BMPs are implemented properly. Periodic unscheduled inspections of facilities and maintenance activities will allow managers to gauge what has been learned in the training programs and how the programs may need to be revised. Attending workshops and conferences about pollution prevention and stormwater management BMPs offered by numerous federal and state agencies and professional and nonprofit organizations will also be encouraged for City employees.

1) Measurable Goals

The measurable goal for implementation of this BMP is to have annual training meetings to update and educate City employees. New employees will also be given individual training at their time of hire. Managers will conduct periodic evaluations to gauge the effectiveness of the training. Development and implementation will be according to the schedule below.

2) Schedule

Program	BMP	Activity	Due Date
Pollution Prevention/ Good Housekeeping For Municipal Operations	City Employee Training and Education	1. Implement general training program and hold annual training classes for City employees.	Years 1-5
		2. Managers conduct periodic random evaluations.	Years 1-5

3) Responsible Persons

The Public Works Department will be responsible for the implementation of these activities.

8.0 Industrial Stormwater Sources

This requirement is only applicable to level 4 MS4s, therefore it does not apply to the City of Heath.

9.0 REPORTING

9.1 Record Keeping

As required by the permit, the City will retain all records, including a copy of the permit and the Notice of Intent, for a period of 3 years or for the duration of the permit term, whichever is greater. The Stormwater Management Program and all other records will be kept at the Public Works Department for review by the TCEQ. Also, the City will make these documents available to the public if requested. Texas law regarding the Public Information Act must be followed.

9.2 Noncompliance Reporting

Any noncompliance that may endanger human health or safety or the environment will be reported by the City to the TCEQ in accordance with 30 TAC Chapter 305.125 (9). A written report will be provided to the TCEQ regional office and to the TCEQ Enforcement Division within 5 working days of becoming aware of the noncompliance. Refer to the Part IV.B.1 of the permit for specific noncompliance reporting requirements.

9.3 Annual Reporting

The City will submit an annual report to the Executive Director of the TCEQ within 90 days of the end of each permit year. A copy of each annual report will be maintained with the SWMP. The report will include the following items as required by the permit:

- a) The status of compliance with the permit conditions,
- b) An assessment of the appropriateness of the identified BMPs,
- c) Progress towards achieving the statutory goal of reducing the discharge of pollutants to the "maximum extent practical",
- d) The status of achievement of the measurable goals for each minimum control measure,
- e) Evaluation of the success of the implementation of the measurable goals,
- f) Status of any additional control measures implemented by the City,
- g) A summary of the results of information collected and analyzed, if any, during the reporting period,
- h) A summary of the activities that the City plans to undertake during the next reporting cycle,
- i) Proposed changes to the SWMP,
- j) The number of municipal construction activities authorized and the total number of acres disturbed, and
- k) The number of non-municipal construction activities that occurred within the jurisdiction of the City.

Refer to Part IV.B.2 of the permit for specific annual reporting requirements.