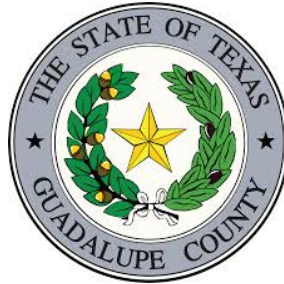


Stormwater Management Program for
Compliance with TXR040000

Guadalupe County MS4
RN105685580



Prepared for:
Guadalupe County

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Executive Summary

Small Municipal Separate Storm Sewer Systems (MS4) located in the State of Texas may discharge directly to surface water in the state only according to monitoring requirements and other conditions set forth in Texas Pollution Discharge Elimination System (TPDES) General Permit No. TXR040000, rules of the Texas Commission on Environmental Quality (TCEQ), laws of the State of Texas, and other Orders of the TCEQ.

Guadalupe County has prepared this Stormwater Management Program (SWMP) in accordance with the requirements of the General Permit and submitted the required Notice of Intent (NOI) in accordance with Part II, Section F of the General Permit.

The SWMP addresses the Minimum Control Measures (MCMs), also known as Best Management Practices (BMPs) as required by TPDES General Permit No. TXR040000 and provides for the measurement of the accomplishments of the MCMs/BMPs. Records of the MCM/BMP measurements will be provided to the TCEQ each year in the annual report.

The purpose of the following is to outline Guadalupe County's program to develop, implement, and enforce a stormwater management program administered through the TPDES. The goal is to reduce the discharge of pollutants to the maximum extent practicable, to protect water quality, and to satisfy the appropriate requirements of the Texas Commission on Environmental Quality (TCEQ) Phase II program under the provisions of Section 402 of the Clean Water Act (CWA) and Chapter 26 of the Texas Water Code (TWC).

Part I – Definitions

The definitions below were retrieved directly from the TPDES General Permit No. TXR040000 relating to discharges from small municipal separate storm sewer systems.

Arid Areas – Areas with an average annual rainfall of less than ten inches.

Benchmarks – A benchmark pollutant value is a guidance level indicator that helps determine the effectiveness of chosen best management practices (BMPs). This type of monitoring differs from “compliance monitoring” in that exceedances of the indicator or benchmark level are not permit violations, but rather indicators that can help identify problems at the Municipal Separate Storm Sewer System (MS4) with exposed or unidentified pollutant sources; or control measures that are either not working correctly, whose effectiveness need to be re-considered, or that need to be supplemented with additional BMP(s).

Best Management Practices (BMPs) – Schedules of activities, prohibitions of practices, maintenance procedures, structural controls, local ordinances, and other management practices to prevent or reduce the discharge of pollutants. BMPs also include treatment requirements, operating procedures, and practices to control runoff, spills or leaks, waste disposal, or drainage from raw material storage areas.

Catch Basins – Storm drain inlets and curb inlets to the storm drain system. Catch basins typically include a grate or curb inlet that may accumulate sediment, debris, and other pollutants.

Classified Segment – A water body that is listed and described in Appendix A or Appendix C of the Texas Surface Water Quality Standards, at 30 Texas Administrative Code (TAC) § 307.10.

Clean Water Act (CWA) – The Federal Water Pollution Control Act or Federal Water Pollution Control Act Amendments of 1972, Pub. L. 92-500, as amended Pub. L. 95-217, Pub. L. 95-576, Pub. L. 96-483, and Pub. L. 97-117, 33 U.S.C. 1251 et. seq.

Common Plan of Development or Sale – A construction activity that is completed in separate stages, separate phases, or in combination with other construction activities. A common plan of development or sale is identified by the documentation for the construction project that identifies the scope of the project, and may include plats, blueprints, marketing plans, contracts, building permits, a public notice or hearing, zoning requests, or other similar documentation and activities.

Construction Activity – Soil disturbance, including clearing, grading, excavating, and other construction related activities (e.g., stockpiling of fill material and demolition); and not including routine maintenance that is performed to maintain the original line and grade, hydraulic capacity, or original purpose of the site (e.g., the routine grading of existing dirt roads, asphalt overlays of existing roads, the routine clearing of existing right-of-ways, and similar maintenance activities). Regulated construction activity is defined in terms of small and large construction activity.

Small Construction Activity is construction activity that results in land disturbance of equal to or greater than one acre and less than five acres of land. Small construction activity also includes the disturbance of less than one acre of total land area that is part of a larger common plan of development or sale if the larger common plan will ultimately disturb equal to or greater than one and less than five acres of land.

Large Construction Activity is construction activity that results in land disturbance of equal to or greater than five acres of land. Large construction activity also includes the disturbance of less than five acres of total land area

that is part of a larger common plan of development or sale if the larger common plan will ultimately disturb equal to or greater than five acres of land.

Construction Site Operator – The entity or entities associated with a small or large construction project that meet(s) either of the following two criteria:

- (a) The entity or entities that have operational control over construction plans and specifications (including approval of revisions) to the extent necessary to meet the requirements and conditions of this general permit; or
- (b) The entity or entities that have day-to-day operational control of those activities at a construction site that are necessary to ensure compliance with a stormwater pollution prevention plan (SWP3) for the site or other permit conditions (for example they are authorized to direct workers at a site to carry out activities required by the SWP3 or comply with other permit conditions).

Control Measure – Any BMP or other method used to prevent or reduce the discharge of pollutants to water in the state.

Conveyance – Curbs, gutters, man-made channels and ditches, drains, pipes, and other constructed features designed or used for flood control or to otherwise transport stormwater runoff.

Discharge – When used without a qualifier, refers to the discharge of stormwater runoff or certain non-stormwater discharges as allowed under the authorization of this general permit.

Final Stabilization – A construction site where any of the following conditions are met:

- (a) All soil disturbing activities at the site have been completed and a uniform (for example, evenly distributed, without large bare areas) perennial vegetative cover with a density of 70 percent (%) of the native background vegetative cover for the area has been established on all unpaved areas and areas not covered by permanent structures, or equivalent permanent stabilization measures (such as the use of riprap, gabions, or geotextiles) have been employed.
- (b) For individual lots in a residential construction site by either:
 - (1) The homebuilder completing final stabilization as specified in condition (a) above; or
 - (2) The homebuilder establishing temporary stabilization for an individual lot prior to the time of transfer of the ownership of the home to the buyer and after informing the homeowner of the need for, and benefits of, final stabilization.
- (c) For construction activities on land used for agricultural purposes (for example pipelines across crop or range land), final stabilization may be accomplished by returning the disturbed land to its preconstruction agricultural use. Areas disturbed that were not previously used for agricultural activities, such as buffer strips immediately adjacent to a surface water and areas which are not being returned to their preconstruction agricultural use must meet the final stabilization conditions of condition (a) above.
- (d) In arid, semi-arid, and drought-stricken areas only, all soil disturbing activities at the site have been completed and both of the following criteria have been met:

- (1) Temporary erosion control measures (e.g., degradable rolled erosion control product) are selected, designed, and installed along with an appropriate seed base to provide erosion control for at least three years without active maintenance by the operator, and
- (2) The temporary erosion control measures are selected, designed, and installed to achieve 70 percent (%) vegetative coverage within three years.

General Permit – A permit issued to authorize the discharge of waste into or adjacent to water in the state for one or more categories of waste discharge within a geographical area of the state or the entire state as provided by Texas Water Code (TWC) § 26.040.

Groundwater Infiltration – For the purposes of this permit, groundwater that enters a municipal separate storm sewer system (including sewer service connections and foundation drains) through such means as defective pipes, pipe joints, connections, or manholes.

High Priority Facilities – High priority facilities are facilities with a high potential to generate stormwater pollutants. These facilities must include, at a minimum, the MS4 operator's maintenance yards, hazardous waste facilities, fuel storage locations, and other facilities where chemicals or other materials have a high potential to be discharged in stormwater. Among the factors that must be considered when giving a facility a high priority ranking are: the amount of urban pollutants stored at the site, the identification of improperly stored materials, activities that must not be performed outside (for example, changing automotive fluids, vehicle washing), proximity to water bodies, proximity to sensitive aquifer recharge features, poor housekeeping practices, and discharge of pollutant(s) of concern to impaired water(s).

Hyperchlorinated Water – Water resulting from hyperchlorination of waterlines or vessels, with a chlorine concentration greater than 10 milligrams per liter (mg/L).

Illicit Connection – Any man-made conveyance connecting an illicit discharge directly to a municipal separate storm sewer.

Illicit Discharge – Any discharge to an MS4 that is not entirely composed of stormwater, except discharges pursuant to this general permit or a separate authorization and discharges resulting from emergency fire-fighting activities.

Impaired Water – A surface water body that is identified as impaired on the latest U.S. Environmental Protection Agency (EPA) approved Clean Water Act (CWA) § 303(d) List or waters with an EPA approved or established TMDL that are found on the latest EPA approved Texas Integrated Report of Surface Water Quality for CWA Sections 305(b) and 303(d) which lists the category 4 and 5 water bodies.

Implementation Plan (I-Plan) – A detailed plan of action that describes the measures or activities necessary to achieve the pollutant reductions identified in the total maximum daily load (TMDL).

Indian Country – Defined in 18 U.S.C. § 1151 as:

- (a) All land within the limits of any Indian reservation under the jurisdiction of the United States (U.S.) Government, notwithstanding the issuance of any patent, and including rights-of-way running through the reservation;
- (b) All dependent Indian communities within the borders of the U.S. whether within the original or subsequently acquired territory thereof, and whether within or without the limits of a state; and

- (c) All Indian allotments, the Indian titles to which have not been extinguished, including rights-of-way running through the same. This definition includes all land held in trust for an Indian tribe.

Indicator Pollutant – An easily measured pollutant, that may or may not impact water quality that indicates the presence of other stormwater pollutants.

Industrial Activity – Any of the ten categories of industrial activities included in the definition of “stormwater discharges associated with industrial activity” as defined in 40 Code of Federal Regulations (CFR) § 122.26(b)(14)(i)-(ix) and (xi).

Infeasible – For the purpose of this permit, infeasible means not technologically possible, or not economically practicable and achievable in light of best industry practices. The TCEQ notes that it does not intend for any small MS4 general permit requirement to conflict with state water right laws.

Maximum Extent Practicable (MEP) – The technology-based discharge standard for MS4s to reduce pollutants in stormwater discharges that was established by the CWA § 402(p). A discussion of MEP as it applies to small MS4s is found in 40 CFR § 122.34.

MS4 Operator – For the purpose of this permit, the public entity or the entity contracted by the public entity, responsible for management and operation of the small municipal separate storm sewer system that is subject to the terms of this general permit.

Municipal Separate Storm Sewer System (MS4) – A conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains):

- (a) Owned or operated by the U.S., a state, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to state law) having jurisdiction over the disposal of sewage, industrial wastes, stormwater, or other wastes, including special districts under state law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under the CWA § 208 that discharges to surface water in the state;
- (b) That is designed or used for collecting or conveying stormwater;
- (c) That is not a combined sewer; and
- (d) That is not part of a publicly owned treatment works (POTW) as defined in 40 CFR § 122.2.

Non-traditional Small MS4 – A small MS4 that often cannot pass ordinances and may not have the enforcement authority like a traditional small MS4 would have to enforce the stormwater management program. Examples of non-traditional small MS4s include counties, transportation authorities (including the Texas Department of Transportation), municipal utility districts, drainage districts, military bases, prisons, and universities.

Notice of Change (NOC) – A written notification from the permittee to the executive director providing changes to information that was previously provided to the agency in a Notice of Intent.

Notice of Intent (NOI) – A written submission to the executive director from an applicant requesting coverage under this general permit.

Notice of Termination (NOT) – A written submission to the executive director from a permittee authorized under a general permit requesting termination of coverage under this general permit.

Outfall – A point source at the point where a small MS4 discharges to Waters of the U.S. and does not include open conveyances connecting two municipal separate storm sewers, or pipes, tunnels, or other conveyances that connect segments of the same stream or other Waters of the U.S. and are used to convey Waters of the U.S. For the purpose of this permit, sheet flow leaving a linear transportation system without channelization is not considered an outfall. Point sources such as curb cuts; traffic or right-of-way barriers with drainage slots that drain into open culverts, open swales, or an adjacent property, or otherwise not actually discharging into Waters of the U.S. are not considered an outfall.

Permittee – The MS4 operator authorized under this general permit.

Point Source – (from 40 CFR § 122.22) any discernible, confined, and discrete conveyance, including but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, landfill leachate collection system, vessel or other floating craft from which pollutants are or may be discharged. This term does not include return flows from irrigated agriculture or agricultural stormwater runoff.

Pollutant(s) of Concern (POCs) – For the purpose of this permit, includes biochemical oxygen demand (BOD), sediment or a parameter that addresses sediment (such as total suspended solids (TSS), turbidity or siltation), pathogens, oil and grease, and any pollutant that has been identified as a cause of impairment of any water body that will receive a discharge from an MS4. (Definition from 40 CFR § 122.32(e)(3)).

Redevelopment – Alterations of a property that changed the “footprint” of a site or building in such a way that there is a disturbance of equal to or greater than one acre of land. This term does not include such activities as exterior remodeling, routine maintenance activities, and linear utility installation.

Semiarid Areas – Areas with an average annual rainfall of at least ten inches, but less than 20 inches.

Small Municipal Separate Storm Sewer System (MS4) – A conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains):

- (a) Owned or operated by the U.S., a state, city, town, borough, county, district, association, or other public body (created by or pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, stormwater, or other wastes, including special districts under state law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under CWA § 208;
- (b) Designed or used for collecting or conveying stormwater;
- (c) Which is not a combined sewer;
- (d) Which is not part of a POTW as defined in 40 CFR § 122.2; and
- (e) Which was not previously regulated under a National Pollutant Discharge Elimination System (NPDES) or a Texas Pollutant Discharge Elimination System (TPDES) individual permit as a medium or large municipal separate storm sewer system, as defined in 40 CFR §§ 122.26(b)(4) and (b)(7).

This term includes systems similar to separate storm sewer systems at military bases, large hospitals or prison complexes, and highways and other thoroughfares. This term does not include separate storm sewers in very discrete areas, such as individual buildings. For the purpose of this permit, a very discrete system also includes storm drains associated with certain municipal offices and education facilities serving a nonresidential

population, where those storm drains do not function as a system, and where the buildings are not physically interconnected to a small MS4 that is also operated by that public entity.

Stormwater and Stormwater Runoff – Rainfall runoff, snow melt runoff, and surface runoff and drainage.

Stormwater Associated with Construction Activity – Stormwater runoff from an area where there is either a large construction or a small construction activity.

Stormwater Management Program (SWMP) – A comprehensive program to manage the quality of discharges from the MS4.

Structural Control (or Practice) – A pollution prevention practice that requires the construction of a device, or the use of a device, to capture or prevent pollution in stormwater runoff. Structural controls and practices may include but are not limited to wet ponds, bioretention, infiltration basins, stormwater wetlands, silt fences, earthen dikes, drainage swales, vegetative lined ditches, vegetative filter strips, sediment traps, check dams, subsurface drains, storm drain inlet protection, rock outlet protection, reinforced soil retaining systems, gabions, and temporary or permanent sediment basins.

Surface Water in the State – Lakes, bays, ponds, impounding reservoirs, springs, rivers, streams, creeks, estuaries, wetlands, marshes, inlets, canals, the Gulf of Mexico inside the territorial limits of the state (from the mean high water mark (MHW) out 10.36 miles into the Gulf), and all other bodies of surface water, natural or artificial, inland or coastal, fresh or salt, navigable or nonnavigable, and including the beds and banks of all water courses and bodies of surface water, that are wholly or partially inside or bordering the state or subject to the jurisdiction of the state. Waters in treatment systems which are authorized by state or federal law, regulation, or permit, and which are created for the purpose of waste treatment are not considered to be water in the state.

Total Maximum Daily Load (TMDL) – The total amount of a substance that a water body can assimilate and still meet the Texas Surface Water Quality Standards.

Traditional Small MS4 – A small MS4 that can pass ordinances and have the enforcement authority to enforce the stormwater management program. An example of traditional MS4s includes cities.

Urban Area – A statistical geographic entity consisting of a densely settled core created from census blocks and contiguous qualifying territory that together have at least 2,000 housing units or 5,000 persons as defined and used by the U.S. Census Bureau in the 2020 Decennial Census.

Urbanized Area (UA) – A retired statistical geographic entity type consisting of a densely settled core created from census tracts or blocks and adjacent densely settled territory that together have a minimum population of 50,000 people which was used by the U.S. Census Bureau in the 2000 and the 2010 Decennial Census.

Waters of the United States – Waters of the United States or Waters of the U.S. means the term as defined in 40 CFR § 122.2.

Part II - Introduction

Federal Regulations

The first NPDES permits regulated direct discharges from non-municipal industrial facilities and stated that the discharge of pollutants to waters of the United States from any point source (such as a sewage treatment plant or industrial facility) was effectively prohibited, unless that discharge was in compliance with a National Pollutant Discharge Elimination (NPDES) permit. In 1977, the Clean Water Act (CWA) was established to define the discharge limits for 65 priority pollutants and extended permit requirements to municipal wastewater treatment facilities.

After the passage of the CWA, the US EPA conducted studies and compiled information into the National Urban Runoff Program (NURP), a comprehensive document that linked water quality problems to stormwater pollutants runoff from non-point sources (such as agricultural and urban area). As a result of the finding by the NURP, the Water Quality Act of 1987 amended Section 402(p) of the Clean Water Act. The amendments to Section 402(p) of the Clean Water Act further expanded the NPDES program to include non-point source discharges, such as stormwater runoff.

The permitting of stormwater discharges was to be implemented into two phases. Phase I, promulgated in 1990, required NPDES permits from stormwater discharges from certain industrial categories, large construction sites (more than five acres of land disturbance), and storm sewer systems of medium and large municipalities (populations exceeding 100,000). Phase II, published in 1999, increased the regulated industrial categories and required permitting of small construction sites (between one and five acres of disturbance) and storm sewer systems of small municipalities including Level 2b which is defined as all non-traditional operators regardless of population served within an urbanized area with a population of at least 50,000 people.

Phase II Stormwater Regulations

The Texas Commission on Environmental Quality (TCEQ) is responsible for implementing a comprehensive program to enforce Phase I and Phase II elements of the NPDES program on a state level. Under Phase II, a Municipal Separate Storm Sewer System (MS4) that is fully or partially located within an urbanized area, as determined by the 2020 Decennial Census, or a MS4 that is designated by TCEQ as having a significant impact on water quality, must obtain a Texas Pollution Discharge Elimination System (TPDES) Municipal Separate Storm Sewer Systems (MS4s) permit and prepare a Stormwater Management Program (SWMP).

MS4 Levels:

The TPDES General Permit No. TXR040000 classifies small MS4s based on their population within an urbanized area as follows:

- Level 1: Operators of traditional small MS4s that serve a population of less than 10,000 within an “urban area with a population of at least 50,000 people”.
- Level 2a: Operators of traditional small MS4s that serve a population of at least 10,000 but less than 40,000 within an “urban area with a population of at least 50,000 people”.
- Level 2b: Operators of all non-traditional small MS4s such as counties, drainage districts, transportation entities, military bases, universities, colleges, correctional institutions, municipal utility districts and other special districts regardless of population served within the “urban area with a population of at least 50,000 people”.

people”, unless the non-traditional MS4 can demonstrate that it meets the criteria for a waiver from permit coverage based on the population served.

- Level 3: Operators of traditional small MS4s that serve a population of at least 40,000 but less than 100,000 within an “urban area with a population of at least 50,000 people”.
- Level 4: Operators of traditional small MS4s that serve a population of 100,000 or more within an “urban area with a population of at least 50,000 people”.

The County is considered a non-traditional, Level 2b small MS4 and must follow the specified requirements for each of the Minimum Control Measures (MCMs).

Part III – Stormwater Management Program

Purpose and Scope

Guadalupe County has developed this stormwater management program (SWMP) in accordance with the requirements of the Texas Pollutant Discharge Elimination System (TPDES) General Permit No. TXR040000.

The purpose of this SWMP is to mitigate the pollution of stormwater runoff with the implementation of various control measures throughout the 5-year permit term. Existing stormwater programs and activities were supplemented with new best management practices (BMPs) to fulfill the requirements of each of the MCMs including:

- Public education and outreach on stormwater impacts;
- Public involvement/participation;
- Illicit discharge detection and elimination;
- Construction site stormwater runoff control;
- Post-construction stormwater management in new development and redevelopment; and
- Pollution prevention/good housekeeping for municipal operations.

Program Development

The mitigation of stormwater runoff pollution is the primary purpose of Guadalupe County's SWMP. The effective control of stormwater runoff will provide for improvement in the quality of the receiving water bodies, the conservation of water resources, and the protection of public and environmental health. The requirements for each MCM have been fulfilled with the development of various best management practices (BMPs). Measurable goals and implementation schedules have been developed for each BMP. The County will utilize an applicable staff member to facilitate and track the implementation of each BMP. The BMPs, their measurable goals, and corresponding implementation schedules can be found in the following pages.

Menu of BMPS

In accordance with TPDES General Permit requirements, Guadalupe County's SWMP addresses each of the following MCMs:

- Public education and outreach;
- Public involvement and participation;
- Illicit discharge detection and elimination;
- Construction site stormwater runoff control;
- Post-construction stormwater management in new development and redevelopment; and
- Pollution prevention/good housekeeping for municipal operations.

The requirements for each MCM have been fulfilled with the development of various best management practices. Descriptions, measurable goals, and schedules for implementation have been developed for each BMP.

Impaired Water Bodies

Stormwater runoff from Guadalupe County MS4 directly discharges into the Guadalupe River below Comal River (Segment 1804), Geronimo Creek (Segment 1804A), Alligator Creek (Segment 1804C), Bear Creek (Segment 1804D), Sandies Creek (Segment 1803B), the Lower San Marcos River (Segment 1808), Ecletto Creek (Segment 1901F), Lower Cibolo Creek (Segment 1902), Mid Cibolo Creek (Segment 1913), and Santa Clara Creek (1902E). The most recent EPA-approved Texas Integrated Report for Clean Water Act Sections 305(b) and 303(d) list (2024) was reviewed. The Guadalupe River below Comal River, Geronimo Creek, Ecletto Creek, Sandies Creek, and Lower Cibolo Creek, are listed as impaired due to bacteria meaning additional BMPs with a focus on the prevention of bacteria pollution must be implemented.

The County will include information on compliance with Part III, Section B of the TPDES General Permit No. TXR040000 in the annual reports. Potential sources of bacteria pollution have been identified as the improper disposal of pet waste and failing septic systems. The following BMPs will be implemented to address impairment for bacteria:

- Published Articles (PE-5)
- Response Procedures (ID-1)
- Septic System Inspections (ID-5)
- Inspection Procedures (ID-7)

Each of these BMPs is detailed in later sections of this SWMP.

Program Management

This SWMP and each of the BMPs will be annually assessed for their progress of implementation or effectiveness in eliminating stormwater runoff pollutants and updated as necessary. If needed, the County will submit a Notice of Change prior to modifying this SWMP. Any changes will be reflected in the annual report.

In concurrence with the preparation of annual reports, the EPA approved 303(d) list and the Texas Integrated Report of Surface Water Quality for CWA Section 305(b) and 303(d) will be reviewed annually for listing or modification thereof impaired waterbodies within the permitted area.

Measurable Goal Evaluation Process

The County will track the implementation of each BMP and provide documentation of activities where applicable. The fulfillment of measurable goals for each BMP will be evaluated on an annual basis. Multiple County employees will be responsible for the implementation, tracking, and evaluation of the BMPs.

Legal Authority

Guadalupe County is not authorized to develop ordinances or implement enforcement actions to meet the requirements of the NPDES General Permit No. TXR040000. However, the County will exert enforcement authority over its facilities, employees, contractors, and other entities over which the County has operational control to adhere to the requirements of the permit. The County will report all incidents or discharges that it cannot enforce against to the applicable MS4 operator which has proper enforcement authority or to the applicable TCEQ regional office.

MCM-1: PUBLIC EDUCATION AND OUTREACH

General Permit Requirements:

The permit requirements below were retrieved directly from the TPDES General Permit No. TXR040000 relating to discharges from small municipal separate storm sewer systems.

- (a) The small MS4 operator shall implement a public education and outreach program to distribute educational materials to the community and conduct equivalent outreach about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff.
 - (1) The public education and outreach program shall at a minimum include the following target audiences, as applicable:
 - a. Traditional MS4s and counties shall address the residents being served;
 - b. Non-traditional MS4s (other than counties) shall address the community served by the MS4 as listed below:
 - (i) Universities shall target the faculty, other staff, and students;
 - (ii) Military bases shall target military personnel (and dependents), and employees (including contractors);
 - (iii) Prison complexes or other multi-building complexes shall target staff and contractors;
 - (iv) Municipal Utility Districts and other special districts shall target residents served, staff, and contractors; and
 - (v) Transportation authorities shall address staff, contractors, and users.
 - c. Small MS4 operators shall address additional target audiences within the small MS4 service area as listed below:
 - (i) Levels 1, 2a, and 2b: No requirement for additional audiences;
 - (ii) Level 3: A minimum of one additional audience; or
 - (iii) Level 4: A minimum of two additional audiences.
 - (2) Small MS4 operators shall target specific pollutant(s) in the permittee's education program. Each small MS4 shall have a minimum of one target pollutant for each target audience from Part IV.D.1(a)(1).a-c of the permit. Small MS4s may implement more than one target pollutant where desired or appropriate to address pollutants in stormwater discharges to the MEP. The target pollutant must be appropriate for the target audience. The same pollutant may be used for more than one target audience and the target pollutant(s) may change annually as needed.
 - (3) Small MS4 operators must use appropriate educational resources as BMPs (materials, events, activities, etc.) in conjunction with the selected pollutants for the selected audiences. The message delivered by these BMPs must be applicable to the target audience and relate to the target pollutant (such as a newsletter article about updated illegal dumping and discharge ordinances distributed to auto mechanic businesses or a hazardous household waste disposal

flyer when applying for trash or recycling services). BMPs which are ongoing throughout the year or permit term may be counted as one annual BMP. Permittees shall explain how each BMP relates to the target pollutant and target audience. Small MS4 operators may change BMPs during the permit cycle if determined appropriate through annual reviews and a different BMP may be more effective for the small MS4's target pollutant or target audience. Any changes shall be reflected in the SWMP and explained in the annual report.

- a. If the permittee has a public website, the permittee shall post its SWMP and the annual reports required under Part V.B.2 or a summary of the annual report on the permittee's website.
 - (i) The SWMP must be posted no later than 30 days after the NOI or NOC approval date; and
 - (ii) The annual report no later than 30 days after the due date.
- b. Over the permit term, small MS4 operators shall implement a minimum number of public education and outreach BMPs as follows:
 - (i) Level 1: three BMPs;
 - (ii) Levels 2a and 2b: four BMPs; or
 - (iii) Levels 3 and 4: five BMPs.
- c. Small MS4 operators shall create/host or support the public education and outreach BMP(s) in Part IV.D.1.(a)(3). To be considered support given to the coordinating groups, the small MS4 operator shall at minimum conduct at least one of the following or similar:
 - (i) Plan, or assist with planning, the distribution of materials;
 - (ii) Coordinate volunteers;
 - (iii) Contribute supplies, materials, tools, or equipment;
 - (iv) Provide assistance from MS4 staff to distribute the materials; or
 - (v) Provide financial support.
- d. Small MS4 operators may partner with other MS4 operators to maximize the program and cost effectiveness of the required outreach.

Stormwater Management Program:

Guadalupe County will post this SWMP and the annual reports (or a summary of annual reports) on the County's website as required by the General Permit. The County will implement BMPs to provide education to residents on stormwater runoff pollution, water quality, and the mitigation of pollutants that contribute bacteria.

Best Management Practices:

The following BMPs have been selected for MCM-1:

- PE-1: Posting of Stormwater Information
- PE-2: Social Media Campaign
- PE-3: Educational Meetings on Stormwater Impacts
- PE-4: Permanent Stormwater Related Signage
- PE-5: Published Articles

Each BMPs measurable goals, responsible party and corresponding implementation schedules can be found in the following tables.

BMP FOR MCM-1	POSTING OF STORMWATER INFORMATION	PE-1
Responsible Party: Designated Representative	Description: Publish current SWMP, annual reports, and applicable stormwater information on the County's website, www.guadalupe.tx.gov	
Applicability: Residents	Rationale: The County's website is available and accessible by the residents of Guadalupe County. Posting of the latest materials would be effective in providing stormwater information to residents.	
Year(s) of Implementation: Years 1, 2, 3, 4 and 5 To be completed by December 31 of each implementation year.	Measurable Goals: • Post this SWMP on the County's website no later than 30 days after the approval date. • Post annual reports no later than 30 days after the due date. • Maintain website links for the entirety of each year. Document 100% of postings on County's website.	

BMP FOR MCM-1	SOCIAL MEDIA CAMPAIGN	PE-2
Responsible Party: Designated Representative	Description: Develop and carry out a social media campaign to generate awareness of stormwater impacts among residents.	
Applicability: Residents	Rationale: Social media postings would provide residents with highly accessible education on measures they can take to protect water quality.	
Year(s) of Implementation: Years 1, 2, 3, 4 and 5 To be completed by December 31 of each implementation year.	Measurable Goals: • Post seasonally appropriate social media messages meant to educate viewers on how they can minimize their impact on stormwater drainage at a minimum of once per quarter and four posts per implementation year. • Document 100% of posts made as part of the social media campaign.	

BMP FOR MCM-1	EDUCATIONAL MEETINGS ON STORMWATER IMPACTS	PE-3
Responsible Party: Designated Representative	Description: Host annual educational meetings focused on the pollution of stormwater runoff and its effect on water quality.	
Applicability: Residents	Rationale: Events focused on stormwater pollutants could inform residents of how everyday activities can contribute to the pollution and impairment of waterways.	
Year(s) of Implementation: Years 1, 2, 3, 4 and 5 To be completed by December 31 of each implementation year.	Measurable Goals: • Develop and host annual educational events advertised on the County's website. • Create a sign-in sheet for attendees and record attendance for 100% of events hosted.	

BMP FOR MCM-1	PERMANENT STORMWATER RELATED SIGNAGE	PE-4
Responsible Party: Designated Representative	Description: Place stormwater signage in a relevant location with high visibility to residents. Inspect and maintain implemented signage as necessary.	
Applicability: Residents	Rationale: The placement of signage where there is public access to the Guadalupe River would provide residents with educational material on the effect that stormwater runoff pollution has on waterways.	
Year(s) of Implementation:	Measurable Goals:	
Year 1 To be completed by December 31 of the implementation year.	Develop and install stormwater signage in a location where the message is relevant and highly visible to residents.	
Years 1, 2, 3, 4 and 5 To be completed by December 31 of each implementation year	Inspect and maintain stormwater signage no less than once per year.	

BMP FOR MCM-1	PUBLISHED ARTICLES	PE-5
Responsible Party: Designated Representative	Description: Publish articles in the Guadalupe County Newsletter that target residents and address the mitigation of bacterial pollutants in stormwater runoff such as the improper disposal of pet waste and failing septic systems.	
Applicability: Residents	Rationale: The County Newsletter is easily accessible for all residents and is an established method of presenting important information to the public.	
Year(s) of Implementation: Years 1, 2, 3, 4 and 5 To be completed by December 31 of each implementation year	Measurable Goals: • Post two articles per year in the Guadalupe County Newsletter that are focused on the mitigation of bacterial pollutants such as the improper disposal of pet waste and failing septic systems.	

MCM-2: PUBLIC INVOLVEMENT/PARTICIPATION

General Permit Requirements:

The permit requirements below were retrieved directly from the TPDES General Permit No. TXR040000 relating to discharges from small municipal separate storm sewer systems.

All permittees, except prisons/correctional facilities, shall involve the public, and, at minimum, comply with any state and local public notice requirements in the planning and implementation activities related to developing and implementing the SWMP. The small MS4 operator must create opportunities, or support activities that are coordinated by citizen groups, for residents and others to become involved with the SWMP. The activities/BMPs must demonstrate an impact on stormwater runoff by improving water quality.

- (a) Over the permit term, small MS4 operators shall implement a minimum number of public involvement/participation activities and measurable goals as follows:
 - (1) Level 1 small MS4: two BMPs;
 - (2) Levels 2a and 2b small MS4: three BMPs; or
 - (3) Levels 3 and 4 small MS4: four BMPs.
- (b) Small MS4 operators shall create/host or support the public involvement/participation BMP(s) in Part IV.D.2.(a). To be considered support given to the coordinating groups the small MS4 operator shall at minimum conduct at least one of the following or similar:
 - (1) Plan, or assist with planning, the event or activity;
 - (2) Contribute supplies, materials, tools, or equipment;
 - (3) Provide assistance from MS4 staff during the activity;
 - (4) Provide assistance with recruiting volunteers for events;
 - (5) Make a space available for projects, meetings, or events;
 - (6) Advertisement for the events;
 - (7) Supply disposal services;
 - (8) Arrange land or stream access;
 - (9) Provide financial support; or
 - (10) Provide donations of goods and services such as food.
- (c) Small MS4 operators may partner with other MS4 operators to maximize the program and cost effectiveness of the required public involvement/participation activities.

Stormwater Management Program:

The County has selected BMPs meant to encourage and promote the participation and involvement of the public in the mitigation of stormwater runoff pollution. Guadalupe County will continue to support existing clean-up and stream restoration events to raise awareness of water quality issues and make public participation accessible to residents.

Best Management Practices:

The following BMPs have been selected for MCM-2:

- PI-1: Litter Clean-Up Events
- PI-2: Stream Restoration Events
- PI-3: Educational/Display Booth

Each BMPs measurable goals, responsible party and corresponding implementation schedules can be found in the following tables.

BMP FOR MCM-2	LITTER CLEAN-UP EVENTS	PI-1
Responsible Party: Designated Representative	Description: Continue to support the Adopt-A-Highway Program to conduct at least one clean-up event per year.	
Applicability: Public Involvement Public Participation	Rationale: Clean-up events provide residents with opportunities to participate in the prevention of stormwater pollution and can raise awareness on the protection of water quality.	
Year(s) of Implementation: Years 1, 2, 3, 4 and 5 To be completed by December 31 of each implementation year.	Measurable Goals: • Host or support at least one clean-up event per year that cleans a minimum of two miles of roadside.	

BMP FOR MCM-2	STREAM RESTORATION EVENTS	PI-2
Responsible Party: Designated Representative	Description: Continue to sponsor stream restoration events for the San Marcos River.	
Applicability: Public Involvement Public Participation	Rationale: Stream restoration events encourage public participation and can raise awareness about the effects of stormwater runoff pollution through the publicity they receive.	
Year(s) of Implementation: Years 1, 2, 3, 4 and 5 To be completed by December 31 of each implementation year.	Measurable Goals: • Host or support a one restoration event per year that addresses a minimum of 25 yards of stream.	

BMP FOR MCM-2	EDUCATIONAL DISPLAY/BOOTH	PI-3
Responsible Party: Designated Representative	Description: Provide an educational display related to water quality accompanied by a staffed presenter at an applicable public event.	
Applicability: Public Involvement Public Participation	Rationale: The County will seek to educate residents and encourage input regarding water quality by providing educational displays at events advertised to the public. The educational display/booth would be most applicable to the educational meeting described in PE-3.	
Year(s) of Implementation: Years 1, 2, 3, 4, and 5 To be completed by December 31 of each implementation year.	Measurable Goals: Develop and implement educational displays related to water quality and provide a staffed booth/display annually.	

MCM-3: ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE)

General Permit Requirements:

The permit requirements below were retrieved directly from the TPDES General Permit No. TXR040000 relating to discharges from small municipal separate storm sewer systems.

(a) Program Development

- (1) All permittees shall develop, implement, and enforce a program to investigate, detect, and eliminate illicit discharges into the small MS4. The program must include a plan to detect and address non-stormwater discharges, including illegal dumping to the small MS4. The Illicit Discharge Detection and Elimination (IDDE) program must include the following:
 - a. A current and accurate MS4 map (see Part IV.D.3.(c)(1));
 - b. Methods for informing and training MS4 field staff (see Part IV.D.3.(c)(2));
 - c. Methods for facilitating public reporting of illicit discharges and illegal dumping (see Part IV.D.3.(c)(3));
 - d. Procedures for responding to illicit discharge, illegal dumping, and spills (see Part IV.D.3.(c)(4));
 - e. Procedures for tracing the source of an illicit discharge and illegal dumping (see Part IV.D.3.(c)(5));
 - f. Procedures for removing the source of the illicit discharge and illegal dumping (see Part IV.D.3.(c)(5));
 - g. Conduct inspections in response to complaints including follow-up inspections, and procedures for inspections (see Part IV.D.3.(c)(6));
 - h. For Levels 2, 3 and 4, if applicable, procedures to prevent and correct any leaking on-site sewage disposal systems that discharge into the small MS4;
 - i. For Level 4, procedures for identifying priority areas within the small MS4 likely to have illicit discharges and illegal dumping, and a list of all such areas identified in the small MS4 (see Part IV.D.3.(e)(1));
 - j. For Level 4, dry weather field screening to detect illicit discharges and illegal dumping (see Part IV.D.3.(e)(2)); and
 - k. For Level 4, procedures to reduce the discharge of floatables in the small MS4 (see Part IV.D.3.(e)(3)).
- (2) For non-traditional small MS4s, if illicit connections, illegal dumping, or illicit discharges are observed related to another operator's MS4, the permittee shall notify the other MS4 operator within 48 hours of discovery. If notification to the other MS4 operator is not practicable, then the permittee shall notify the appropriate TCEQ Regional Office of the possible illicit connection, illegal dumping, or illicit discharge.
- (3) If another MS4 operator notifies the permittee of an illegal connection, illegal dumping, or illicit discharge to the small MS4, then the permittee shall follow the requirements specified in Part IV.D.3.(c)(5).

(b) Allowable Non-Stormwater Discharges

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

(c) Requirements for All Permittees

All permittees shall meet all the following requirements.

(1) MS4 Mapping

All permittees shall maintain a current and accurate MS4 map, which must be located on site and available for review by TCEQ. The MS4 map must show at a minimum the following information:

- a. The location of all small MS4 outfalls that are operated by the permittee and that discharge into Waters of the U.S.;
- b. The location and name of all surface waters receiving discharges from the small MS4 outfalls; and
- c. Priority areas identified under Part IV.D.3.(e)(1), if applicable.

(2) Education and Training

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

(3) Public Reporting of Illicit Discharges and Spills

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

(4) All permittees shall develop and maintain onsite procedures for responding to illicit discharges, illegal dumping, and spills.

(5) Source Investigation and Elimination

- a. Minimum Investigation Requirements – Upon becoming aware of an illicit discharge or illegal dumping, all permittees shall conduct an investigation to identify and locate the source of such illicit discharge or illegal dumping as soon as practicable.
 - (i) All permittees shall prioritize the investigation of discharges based on their relative risk of pollution. For example, sanitary sewage may be considered a high priority discharge.
 - (ii) All permittees shall report to the TCEQ immediately upon becoming aware of the occurrence of any illicit flows believed to be an immediate threat to human health or the environment.
 - (iii) All permittees shall track all investigations and document, at a minimum, the date(s) the illicit discharge or illegal dumping was observed; the results of the investigation; any follow-up of the investigation; and the date the investigation was closed.
- b. Identification and Investigation of the Source of the Illicit Discharge –All permittees shall investigate and document the source of illicit discharges and illegal dumping where the permittees have jurisdiction to complete such an investigation. If the source of illicit discharge or illegal dumping extends outside the permittee's boundary, all permittees shall notify the adjacent permitted MS4 operator or the appropriate TCEQ Regional Office.

- c. **Corrective Action to Eliminate Illicit Discharge**
If and when the source of the illicit discharge or illegal dumping has been determined, all permittees shall immediately notify the responsible party of the problem, and shall require the responsible party to perform all necessary corrective actions to eliminate the illicit discharge and illegal dumping.
- (6) **Inspections** – The permittee shall conduct inspections, in response to complaints, and shall conduct follow-up inspections to ensure that corrective measures have been implemented by the responsible party. The permittee shall develop written procedures describing the basis for conducting inspections in response to complaints and conducting follow-up inspections.

Stormwater Management Program:

The County has developed BMPs to facilitate the implementation and enforcement of an IDDE program of detection and eliminating of illicit discharges within the County. The IDDE program will include an up-to-date MS4 map, training, and procedures for tracing and eliminating sources along with fielding and responding to reports from residents. The IDDE procedures to be implemented will address discharges that may contribute bacteria.

Best Management Practices:

The following BMPs will be implemented for MCM-3:

- ID-1: Response Procedures
- ID-2: IDDE Training
- ID-3: Public Reporting Method
- ID-4: Source Investigations
- ID-5: Septic System Inspections
- ID-6: Corrective Action
- ID-7: Inspection Procedures
- ID-8: MS4 Map
- ID-9: Inspections in Response to Complaints

Each BMPs measurable goals, responsible party and corresponding implementation schedules can be found in the following tables.

BMP FOR MCM-3	RESPONSE PROCEDURES	ID-1
Responsible Party: Sanitation Inspector	Description: Develop and maintain onsite procedures for responding to illicit discharges, illegal dumping, and spills. Address discharges that may contribute bacteria such as the improper disposal of pet waste and failing septic systems.	
Applicability: Illicit Discharge Detection and Elimination	Rationale: Adequate response procedures are critical to ensuring the safety of the responder and surrounding residents. The development of response procedures will also increase the effectiveness of responses to illicit discharges, illegal dumping, and spills.	
Year(s) of Implementation: Years 1, 2, 3, 4, and 5 To be completed by December 31 of the implementation years.	Measurable Goals: • Develop IDDE response procedures to be used for the County. • At a minimum of once per year, review and update response procedures where applicable.	

BMP FOR MCM-3	IDDE TRAINING	ID-2
Responsible Party: Sanitation Inspector	Description: Conduct in-person or virtual training for all applicable field staff on the detection and reporting of illicit discharge, illegal dumping, or illicit connection.	
Applicability: Illicit Discharge Detection and Elimination	Rationale: Certain field staff may encounter illicit discharges, illegal dumping, or illicit connections as part of their normal job responsibilities. Proper training will assist staff to identify, report, and eliminate illicit discharges.	
Year(s) of Implementation: Years 1, 2, 3, 4, and 5 To be completed by December 31 of the implementation years.	Measurable Goals: • Conduct at least one training program per year for all field staff that may observe or encounter an illicit discharge, illegal dumping, or illicit connection as part of their job responsibilities. • Maintain 100% of training program materials and attendance lists.	

BMP FOR MCM-3	PUBLIC REPORTING METHOD	ID-3
Responsible Party: Designated Representative	Description: Maintain and publicize a public reporting method for illicit discharge and illegal dumping via email or phone.	
Applicability: Illicit Discharge Detection and Elimination	Rationale: A public reporting method will assist in containing and preventing illegal dumping and illegal discharge by ensuring that reports reach the appropriate staff as soon as possible.	
Year(s) of Implementation: Years 1, 2, 3, 4 and 5 To be completed by December 31 of each implementation year.	Measurable Goals: • Maintain one public reporting method for 100% of the permit term. • Publish the reporting method on the County's website for 100% of the permit term. • Publicize the reporting method no less than twice a year in a method designed to reach the majority of residents. Develop and implement a tracking system to estimate what percentage of the intended audience is reached. • Document dates for 100% of postings/advertisements made.	

BMP FOR MCM-3	SOURCE INVESTIGATIONS	ID-4
Responsible Party: Sanitation Inspector	Description: Guadalupe County will ensure their responsivity to known illicit discharges, illegal dumping, and high priority discharges. The County will notify the proper MS4 operators or TCEQ regional office of instances of illicit discharges or illegal dumping that are outside of the County's jurisdiction and immediately notify TCEQ of illicit flows that are an immediate threat to human life and/or the surrounding environment.	
Applicability: Illicit Discharge Detection and Elimination	Rationale: TPDES General Permit No. TXR040000 requires that illicit discharges and illegal dumping be effectively detected and eliminated. This BMP will ensure that TPDES standards are met for all investigations of illicit discharge and illegal dumping.	
Year(s) of Implementation: Years 1, 2, 3, 4 and 5 To be completed by December 31 of each implementation year.	Measurable Goals: • Respond to 100% of known illicit discharges and illegal dumping each year and investigate their sources or notify the appropriate agency with authority to act. • Respond to 100% of high priority discharges (e.g. sanitary sewer discharges) within 24 hours or notify the appropriate agency with authority to act. • Notify the applicable MS4 operator or TCEQ regional office of 100% of known illicit discharges or illegal dumping outside of Guadalupe County's jurisdiction. • Immediately notify TCEQ of 100% of illicit flows that are believed to be an immediate threat to human life or the surrounding environment. • Document 100% of all illicit discharge investigations conducted. • Document 100% of the follow-up investigations to ensure corrective action was taken by the responsible party.	

BMP FOR MCM-3	SEPTIC SYSTEM INSPECTIONS	ID-5
Responsible Party: Sanitation Inspector	Description: Continue inspection of on-site septic systems (OSSFs) in an attempt to reduce sanitary sewer overflows and septic system failure. Guadalupe County is responsible for enforcing minimum standards for the design, construction, installation, and operation of OSSFs. Inspection and enforcement shall be aimed at preventing septic systems from failing and detect and require landowners to correct existing systems that are failing.	
Applicability: Illicit Discharge Detection and Elimination	Rationale: Septic system failures can be minimized by implementation of rule enforcement that govern design, construction, installation and operation.	
Year(s) of Implementation: Years 1, 2, 3, 4, and 5 To be completed by December 31 of the implementation year.	Measurable Goals: • Develop and implement procedures to annually screen a minimum of 20% of the County's area within the water sheds of impaired waterbodies to identify failing OSSFs. • Maintain an inventory of 100% of the failing OSSFs and their status. • Review and update the inventory of failing OSSFs annually. • Each year, require 100% of parties responsible for failing OSSFs to eliminate the illicit discharge using the necessary corrective actions. • Investigate and address 100% of the OSSF complaints received through the public reporting method discussed in ID-3 each year.	

BMP FOR MCM-3	CORRECTIVE ACTION	ID-6
Responsible Party: Sanitation Inspector	Description: Initiate proper corrective action to eliminate all known instances of illicit discharge and illegal dumping.	
Applicability: Illicit Discharge Detection and Elimination	Rationale: Responding to illicit discharges and illegal dumping in a timely manner and with the proper corrective action is critical to preventing and mitigating the pollution of stormwater runoff.	
Year(s) of Implementation: Years 1, 2, 3, 4, and 5 To be completed by December 31 of the implementation year.	Measurable Goals: • Notify the responsible party within 24 hours for 100% of illicit discharges or illegal dumping where a source has been determined. • Require 100% of known responsible parties to perform all necessary corrective actions to eliminate illicit discharge or illegal dumping.	

BMP FOR MCM-3	INSPECTION PROCEDURES	ID-7
Responsible Party: Code Compliance Officer	Description: Develop written procedures describing the basis for conducting IDDE inspections in response to complaints and follow-up inspections. Continually review and update procedures for the inspection of illicit discharge and illegal dumping. Address discharges that may contribute bacteria such as the improper disposal of pet waste and failing septic systems.	
Applicability: Illicit Discharge Detection and Elimination	Rationale: Guadalupe County must have a set of procedures dedicated to the inspection of illicit discharges and illegal dumping. As inspections are conducted, the County can identify areas of improvement for their procedures.	
Year(s) of Implementation: Years 1, 2, 3, 4 and 5 To be completed by December 31 of each implementation year.	Measurable Goals: • Develop procedures for IDDE inspections in response to complaints and follow-up inspections. • Review and update inspection procedures no less than once per year to address changes and make improvements to the established procedures where applicable.	

BMP FOR MCM-3	MS4 MAP	ID-8
Responsible Party: Designated Representative	Description: Create and maintain a map containing: • The location of all outfalls that are operated by the County and that discharge into waters of the U.S.; • The location and name of all surface waters that receive discharges from the County-operated outfalls; and • Any additional information needed by the permittee to implement the SWMP.	
Applicability: Illicit Discharge Detection and Elimination	Rationale: The mapping of County-owned outfalls can be used to identify potential areas for illicit discharge.	
Year(s) of Implementation:	Measurable Goals:	
Year 1 To be completed by December 31 of the implementation year.	• Create an MS4 map meeting the requirements set forth in the TPDES General Permit No. TXR040000.	
Years 2, 3, 4 and 5 To be completed by December 31 of each implementation year.	• Review and update annually to address changes and add 100% of new stormwater sewer infrastructure and new outfalls to MS4 map.	

BMP FOR MCM-3	INSPECTIONS IN RESPONSE TO COMPLAINTS	ID-9
Responsible Party: Sanitation Inspector	Description: Guadalupe County shall conduct inspections in response to all complaints and conduct follow-up inspections to ensure that corrective measures have been implemented.	
Applicability: Illicit Discharge Detection and Elimination	Rationale: To mitigate the pollution of stormwater runoff within the County, it is important to examine every complaint that is made regarding illicit discharge or illegal dumping.	
Year(s) of Implementation: Years 1, 2, 3, 4, and 5 To be completed by December 31 of each implementation year.	Measurable Goals: • Conduct inspections in response to 100% of complaints each year according to the established procedures. • Conduct follow-up inspections in 100% of the cases each year where necessary as described in the established procedures.	

MCM-4 – CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

General Permit Requirements:

The permit requirements below were retrieved directly from the TPDES General Permit No. TXR040000 relating to discharges from small municipal separate storm sewer systems.

(a) Requirements and Control Measures

All permittees shall develop, implement, and enforce a program requiring operators of small and large construction activities to select, install, implement, and maintain stormwater control measures that prevent illicit discharges to the MEP. The program must include the development and implementation of an ordinance or other regulatory mechanism, as well as sanctions to ensure compliance to the extent allowable under state, federal, and local law, to require erosion and sediment control. If TCEQ waives requirements for stormwater discharges associated with small construction from a specific site(s), the permittee is not required to enforce the program to reduce pollutant discharges from such site(s).

(b) Requirements for All Permittees

All permittees shall meet the following requirements.

- (1) All permittees shall require that construction site operators implement appropriate erosion and sediment control BMPs. The permittee's construction program must ensure erosion and sediment controls, soil stabilization, and BMP requirements are effectively implemented for all small and large construction activities discharging to its small MS4 consistent with the TPDES CGP, TXR150000.

- (2) Prohibited Discharges - The following discharges are prohibited:

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

- (3) Construction Plan Review Procedures

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

- a. The site plan review procedures must incorporate consideration of potential water quality impacts.

- b. The permittee may not approve any plans unless the plans contain appropriate site-specific construction site control measures that, at a minimum, meet the requirements described in the TPDES CGP, TXR150000.

The permittee may require and accept a plan, such as a stormwater pollution prevention plan (SWP3), that has been developed pursuant to the TPDES CGP, TXR150000.

(4) Construction Site Inspections and Enforcement

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

- a. The permittee shall conduct inspections based on the evaluation of factors that are a threat to water quality, such as: soil erosion potential; site slope; project size and type; sensitivity of receiving water bodies; proximity to receiving water bodies; non-stormwater discharges; and past record of non-compliance by the operators of the construction site.
- b. Inspections must occur during the active construction phase.
 - (i) All permittees shall develop and implement updated written procedures outlining the inspection and enforcement requirements. These procedures must be maintained on-site or in the SWMP and be made available to TCEQ.
 - (ii) Inspections of construction sites must, at a minimum:
 - 1. Determine whether the site has appropriate coverage under the TPDES CGP, TXR150000. If no coverage exists, notify the permittee of the need for permit coverage;
 - 2. Conduct a site inspection to determine if control measures have been selected, installed, implemented, and maintained according to the small MS4's requirements;
 - 3. Assess compliance with the permittee's ordinances and other regulations; and
 - 4. Provide a written or electronic inspection report.
- c. Based on site inspection findings, all permittees shall take all necessary follow-up actions (for example, follow-up-inspections or enforcement) to ensure compliance with permit requirements and the SWMP. These follow-up and enforcement actions must be tracked and documentation maintained for review by the TCEQ.

For non-traditional small MS4s with no enforcement powers, the permittee shall notify the adjacent MS4 operator with enforcement authority or the appropriate TCEQ Regional Office.

(5) Information Submitted By the Public

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

(6) MS4 Staff Training

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

Stormwater Management Program:

Guadalupe County will develop and implement BMPs for construction activities resulting in a land disturbance of one acre or more to reduce pollutants in stormwater runoff. These will apply to construction activities that are part of a larger common plan of development, or sale, that would disturb one acre or more. These will not apply to small construction activities where the TCEQ has waived the permitting requirements for stormwater discharges. For applicable construction sites or activities, a stormwater pollution prevention plan (SWP3) in accordance with TPDES will be required to be incorporated into the construction plans by the engineer or architect.

To the extent allowable under State and local law, regulations will be formed to require construction site contractors performing maintenance or construction of County property to implement necessary erosion and sediment controls, properly dispose of waste, and prohibit certain discharges.

Guadalupe County will develop procedures for the review of site plans to ensure the consideration of potential water quality impacts, handling of reports submitted by the public, and conducting of site inspections for large and small construction sites within the permitted area.

Best Management Practices:

The following BMPs will be implemented for MCM-4:

- C-1: Erosion and Sediment Control Regulation
- C-2: Site Plan Review Procedures
- C-3: Construction Site Inspection Procedures
- C-4: Staff Training
- C-5: Regulations for Prohibited Discharges
- C-6: Procedures for Reports from the Public
- C-7: Construction Site Inspections

Each BMPs measurable goals, responsible party and corresponding implementation schedules can be found in the tables.

BMP FOR MCM-4	EROSION AND SEDIMENT CONTROL REGULATION	C-1
Responsible Party: Code Compliance Officer	Description: Utilize existing regulatory mechanisms to enforce stormwater pollution prevention regulations during construction, including requiring construction site contractors to implement erosion and sediment control BMPs and to control waste at the construction site. Revise rules as needed and/or adopt new regulations as necessary to enforce the requirements of TPDES General Permit No. TXR040000.	
Applicability: Construction Site Stormwater Runoff Control	Rationale: Erosion and sedimentation from construction sites can cause a reduction in water quality. Phase II municipalities must implement a stormwater management program that includes a component for controlling erosion and sediment on construction sites disturbing at least one acre including those that are part of a larger common plan of development.	
Year(s) of Implementation: Years 1, 2, 3, 4 and 5 To be completed by December 31 of each implementation year.	Measurable Goals: Review and update regulations for construction site stormwater runoff control at least once during the permit term to address changes and make improvements where applicable.	

BMP FOR MCM-4	SITE PLAN REVIEW PROCEDURES	C-2
Responsible Party: County Engineer	Description: Continue to adhere to the County's existing procedures for reviewing site development plans for water quality considerations, including sediment and erosion control for construction sites, to the extent allowable by state, federal, and local law. Continue to require that site plans contain construction site control measures that meet the specific requirements set forth in the TPDES GCP, TXR150000.	
Applicability: Construction Site Stormwater Runoff Control	Rationale: The purpose of construction site runoff control is to reduce pollutants in stormwater runoff from construction activities. Guadalupe County is required to have procedures for site plan review of construction plans that consider potential water quality impacts. Site plans must address erosion and sediment controls as well as controls for other waste at the site.	
Year(s) of Implementation: Years 1, 2, 3, 4 and 5 To be completed by December 31 of each implementation year.	Measurable Goals: • Implement site plan review procedures for 100% of new construction site plans received each year. • Review and update site plan review procedures at least once a year to address changes and make improvements where applicable.	

BMP FOR MCM-4	CONSTRUCTION SITE INSPECTION PROCEDURES	C-3
Responsible Party: Designated Representative	Description: Continue the County's existing procedures for the inspection and enforcement of large and small construction sites and maintain inspection procedures on-site.	
Applicability: Construction Site Stormwater Runoff Control	Rationale: Construction sites lacking adequate stormwater controls can contribute significant amounts of sediment to stormwater runoff. The continuation and maintaining of inspection procedures that ensure the site has the necessary stormwater controls in place will assist mitigating stormwater runoff pollution from construction sites.	
Year(s) of Implementation: Years 1, 2, 3, 4 and 5 To be completed by December 31 of each implementation year.	Measurable Goals: Review and update inspection procedures for large and small construction sites no less than once a year to address changes and make improvements where applicable.	

BMP FOR MCM-4	STAFF TRAINING	C-4
Responsible Party: Designated Representative	Description: Conduct in-person or virtual training for all staff whose job duties are related to implementing the construction stormwater program (including permitting, plan review, construction site inspections and enforcement).	
Applicability: Construction Site Stormwater Runoff Control	Rationale: Guadalupe County is responsible for the adherence of construction sites under their jurisdiction to stormwater discharge regulations. Therefore, all applicable staff should receive training on regulatory requirements, BMPs, inspections, and enforcement.	
Year(s) of Implementation: Years 1, 2, 3, 4 and 5 To be completed by December 31 of each implementation year.	Measurable Goals: • Conduct at least one training program per year for all field staff whose primary job duties are related to implementing the construction stormwater program. • Maintain 100% of training program materials and attendance lists.	

BMP FOR MCM-4	REGULATIONS FOR PROHIBITED DISCHARGES	C-5
Responsible Party: Code Compliance Officer	Description: Utilize existing regulatory mechanisms for prohibited discharges and revise them as necessary to enforce the requirements of TPDES General Permit No. TXR040000 for the following discharges: - Wastewater from washout of concrete and wastewater from water well drilling operations, unless managed by an appropriate control; - Wastewater from washout and cleanout of stucco, paint, from release oils, and other construction materials; - Fuels, oils, or other pollutants used in vehicle and equipment operation and maintenance; - Soaps or solvents used in vehicle and equipment washing; and - Discharges from dewatering activities, including discharges from dewatering of trenches and excavations, unless managed by appropriate BMPs.	
Applicability: Construction Site Stormwater Runoff Control	Rationale: To ensure that construction site activities under the County's jurisdiction mitigate stormwater runoff pollution, existing regulations for prohibited discharges must be utilized and revised to adhere to the requirements set forth in TPDES General Permit No. TXR040000.	
Year(s) of Implementation: Years 1, 2, 3, 4 and 5 To be completed by December 31 of each implementation year.	Measurable Goals: • Develop and maintain regulatory mechanisms to prohibit the discharges named in TPDES General Permit No. TXR040000. • Review and update the regulatory mechanisms no less than once during the permit term to address changes and make improvements where applicable.	

BMP FOR MCM-4	PROCEDURES FOR REPORTS FROM THE PUBLIC	C-6
Responsible Party: Designated Representative	Description: Develop, maintain, and implement a public reporting method via email or phone along with procedures for the receipt and consideration of information received from the public regarding construction site stormwater runoff controls.	
Applicability: Construction Site Stormwater Runoff Control	Rationale: A public reporting method will assist in identifying sources of stormwater runoff pollution and by ensuring that reports reach the appropriate staff as soon as possible. Procedures for the consideration and receipt of information submitted by the public will assist in identifying the validity of reports and, if necessary, determining the proper corrective actions.	
Year(s) of Implementation: Years 1, 2, 3, 4 and 5 To be completed by December 31 of each implementation year.	Measurable Goals: • Review and update procedures for the receipt and consideration of information submitted by the public at a minimum of once per year to address changes and make improvements where applicable. • Maintain one webpage, hotline, or similar method for the receipt of information submitted by the public for 100% of the permit term. • Publish the reporting method on the County's website for 100% of the permit term.	

BMP FOR MCM-4	CONSTRUCTION SITE INSPECTIONS	C-7
Responsible Party: Designated Representative	Description: Conduct construction site inspections during the active construction phase based on the evaluation factors that are a threat to water quality, such as: soil erosion potential, site slope, project size and type, sensitivity of receiving water bodies, proximity to receiving water bodies, non-stormwater discharges, and past record of non-compliance by the operators of the construction site.	
Applicability: Construction Site Stormwater Runoff Control	Rationale: The compliance of construction site operators with regulations for stormwater runoff controls must be continually maintained to avoid the transmission of non-stormwater discharge.	
Year(s) of Implementation: Years 1, 2, 3, 4 and 5 To be completed by December 31 of each implementation year.	Measurable Goals: • Conduct inspections at a minimum of 80% of active construction sites annually according to the established procedures. • Conduct annual follow-up inspections in 100% of cases where necessary as described in the established procedures.	

MCM-5: POST-CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

General Permit Requirements:

The permit requirements below were retrieved directly from the TPDES General Permit No. TXR040000 relating to discharges from small municipal separate storm sewer systems.

(a) Post-Construction Stormwater Management Program

All permittees shall meet the requirements below.

- (1) All permittees shall develop, implement, and enforce a program, to the extent allowable under state, federal, and local law, to control stormwater discharges from new development and redeveloped sites that discharge into the small MS4 that disturb one acre or more, including projects that disturb less than one acre that are part of a larger common plan of development or sale. The program must be established for private and public development sites. The program may utilize an offsite mitigation and payment in lieu of components to address this requirement.
- (2) All permittees shall use, to the extent allowable under state, federal, and local law and local development standards, an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects. The permittees shall establish, implement, and enforce a requirement that owners or operators of new development and redeveloped sites design, install, implement, and maintain a combination of structural and non-structural BMPs appropriate for the community and that protects water quality. If the construction of permanent structures is not feasible due to space limitations, health and safety concerns, cost effectiveness, or highway construction codes, the permittee may propose an alternative approach to TCEQ.

(b) Requirements for All Permittees

All permittees shall meet all the following requirements.

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

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

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

- a. Maintenance performed by the permittee. (See Part IV.D.6)
- b. Maintenance performed by the owner or operator of a new development or redeveloped site under a maintenance plan. The maintenance plan must be filed in the real property records of the County in which the property is located. The permittee shall require the owner or operator of any new development or redeveloped site to develop and implement a maintenance plan addressing maintenance requirement for any structural control measures installed on site. The permittee shall require operation and maintenance performed is documented and retained on site, such as at the offices of the owner or operator, and made available for review by the small MS4.

Stormwater Management Program:

To the extent allowable under state, federal, and local law, Guadalupe County will develop, implement, and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre of land (including smaller sites that are part of a larger common plan of development). The County will achieve this through the development of regulations to address post-construction runoff and procedures to ensure the long-term operation and maintenance of County structural stormwater controls. The County will document and maintain records of all enforcement actions taken during the permit term.

Best Management Practices:

The following BMPs will be implemented for MCM-5:

- PC-1: Post-Construction Regulations
- PC-2: Recordation of Enforcement Actions Taken
- PC-3: Long Term O&M of Stormwater Control Measures

Each BMPs measurable goals, responsible party and corresponding implementation schedules can be found in the following tables.

BMP FOR MCM-5	POST-CONSTRUCTION REGULATIONS	PC-1
Responsible Party: Code Compliance Officer	Description: Utilize existing regulatory mechanisms to enforce requirements regarding post-construction runoff from new development and redevelopment projects disturbing at least one acre including those that are part of a larger common plan of development. Revise regulations as needed and/or adopt new regulations as necessary to enforce the requirements of TPDES General Permit No. TXR040000.	
Applicability: Post-Construction Stormwater Management	Rationale: Stormwater runoff from impervious areas can contain various forms of pollutants. The management post-construction runoff can limit surface runoff volumes and reduce the pollutant loadings of runoff.	
Year(s) of Implementation: Years 1, 2, 3, 4 and 5 To be completed by December 31 of each implementation year.	Measurable Goals: Review and update the regulatory mechanism no less than once during the permit term to address changes and make improvements where applicable.	

BMP FOR MCM-5	RECORDATION OF ENFORCEMENT ACTIONS TAKEN	PC-2
Responsible Party: Designated Representative	Description: Document and maintain recordation of enforcement actions and make them available for review by the TCEQ.	
Applicability Post-Construction Stormwater Management	Rationale: All enforcement actions taken upon sites post-construction must be recorded and made readily available for the TCEQ.	
Year(s) of Implementation: Years 1, 2, 3, 4 and 5 To be completed by December 31 of each implementation year.	Measurable Goals: • Maintain records of 100% of enforcement actions taken each year. • Make 100% of enforcement records available to the TCEQ for review within 24 hours of request.	

BMP FOR MCM-5	LONG-TERM O&M OF STORMWATER CONTROL MEASURES	PC-3
Responsible Party: Designated Representative	Description: Guadalupe County will ensure the long-term operation and maintenance of structural stormwater controls using maintenance performed by applicable County faculty and agreements with operators of new development that include a long-term operation and maintenance plan.	
Applicability: Post-Construction Stormwater Runoff Control	Rationale: This BMP is meant to ensure the continuation of care and maintenance for structural stormwater controls within the County.	
Year(s) of Implementation: Years 1, 2, 3, 4 and 5 To be completed by December 31 of each implementation year.	Measurable Goals: • For each year of the permit term, implement a maintenance plan and schedule established by the County addressing 100% of stormwater control measures where the County is responsible for maintenance. • For each year of the permit term, require 100% of the owners or operators of any newly developed or redeveloped sites to develop and implement a maintenance plan addressing maintenance requirements for any structural control measures installed on site. • Require the site owner or operators to maintain documentation, such as a tracking log, onsite of 100% of the maintenance performed and made available for review by the County or the TCEQ within 24 hours of request.	

MCM-6: POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

General Permit Requirements:

The permit requirements below were retrieved directly from the TPDES General Permit No. TXR040000 relating to discharges from small municipal separate storm sewer systems.

(a) Program Development

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

(b) Requirements for All Permittees

All permittees shall meet the requirements described below.

(1) Permittee-owned Facilities and Control Inventory

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

- a. Composting facilities;
- b. Equipment storage and maintenance facilities;
- c. Fuel storage facilities;
- d. Hazardous waste disposal facilities;
- e. Hazardous waste handling and transfer facilities;
- f. Incinerators;
- g. Landfills;
- h. Materials storage yards;
- i. Pesticide storage facilities;
- j. Buildings, including schools, libraries, police stations, fire stations, and office buildings;
- k. Parking lots;
- l. Golf courses;
- m. Swimming pools;
- n. Public works yards;
- o. Recycling facilities;

- p. Salt storage facilities;
 - q. Solid waste handling and transfer facilities;
 - r. Street repair and maintenance sites;
 - s. Vehicle storage and maintenance yards; and
 - t. Structural stormwater controls.
- (2) Training and Education
- All permittees shall inform or train appropriate employees involved in implementing pollution prevention and good housekeeping practices. All permittees shall maintain a training attendance list for review by TCEQ when requested.
- (3) Disposal of Waste Material – Waste materials removed from the small MS4 must be disposed of in accordance with 30 TAC Chapters 330 or 335, as applicable.
- (4) Contractor Requirements and Oversight
- a. Any contractors hired by the permittee to perform maintenance activities on permittee-owned facilities must be contractually required to comply with all of the stormwater control measures, good housekeeping practices, and facility-specific stormwater management operating procedures described in Parts IV.D.6.(b)(2)-(6).
 - b. All permittees shall provide oversight of contractor activities to ensure that contractors are using appropriate control measures and SOPs. Oversight procedures must be maintained on-site and made available for inspection by TCEQ.
- (5) Municipal Operation and Maintenance Activities
- a. Assessment of permittee-owned operations

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

 - (i) Road and parking lot maintenance, including such areas as pothole repair, pavement marking, sealing, and re-paving;
 - (ii) Bridge maintenance, including such areas as re-chipping, grinding, and saw cutting;
 - (iii) Cold weather operations, including plowing, sanding, and application of deicing and anti-icing compounds and maintenance of snow disposal areas; and
 - (iv) Right-of-way maintenance, including mowing, herbicide and pesticide application, and planting vegetation.
 - b. All permittees shall identify pollutants of concern that could be discharged from the above O&M activities (for example, metals; chlorides; hydrocarbons such as benzene, toluene, ethyl benzene, and xylenes; sediment; and trash).

- c. All permittees shall develop and implement a set of pollution prevention measures that will reduce the discharge of pollutants in stormwater from the above activities. These pollution prevention measures must include at least two of the following:
 - (i) Replacing materials and chemicals with more environmentally friendly materials or methods;
 - (ii) Tracking application of deicing and anti-icing compounds;
 - (iii) Using suspended tarps, booms, or vacuums to capture paint, solvents, rust, paint chips and other pollutants generated by regular bridge maintenance; and
 - (iv) Placing barriers around or conducting runoff away from deicing chemical storage areas to prevent discharge into surface waters.
 - d. Inspection of pollution prevention measures - All pollution prevention measures implemented at permittee-owned facilities must be visually inspected to ensure they are working properly. The permittee shall develop written procedures that describes frequency of inspections occurring at least one time annually and how they will be conducted. A log of inspections must be maintained and made available for review by the TCEQ upon request.
- (6) Structural Control Maintenance
- If BMPs include structural controls, maintenance of the controls must be performed by the permittee and consistent with maintaining the effectiveness of the BMP. The permittee shall develop written procedures that define the frequency of inspections occurring at least one time annually and how they will be conducted.

Stormwater Management Program:

Guadalupe County will develop and maintain an inventory of facilities and stormwater controls that it owns and operates within the regulated area. The County will develop and implement an operation and maintenance program focused on the prevention or reduction of pollutant runoff from municipal operations. The County will achieve this through the adoption and implementation of policies and procedures that protect against stormwater runoff pollution. A housekeeping training program for County employees will be developed. The municipal operations that are subject to the operation, maintenance or training program developed under the conditions of good housekeeping/pollution prevention MCM include:

- Park and open space maintenance;
- Street, road, or highway maintenance;
- Fleet and building maintenance;
- Stormwater system maintenance;
- New construction and land disturbances;
- Municipal parking lots;
- Vehicle and equipment maintenance and storage yards;
- Waste transfer stations; and

- Salt/sand storage locations.

Guadalupe County does not own or operate any industrial activities that are subject to TPDES industrial stormwater regulations. All County waste materials will be disposed of in accordance with 30 TAC Chapters 330 or 335.

Contractors hired by the County to perform maintenance activities on County-owned facilities will be contractually required to comply with stormwater control measures, good housekeeping practices, and facility-specific stormwater management operating procedures. Procedures for contractor oversight will be developed.

The County will identify pollutants of concern that potentially originate from County operation and maintenance activities.

The County will implement plans to track the application of deicing and anti-icing compounds within the and place barriers around or conduct runoff away from deicing chemical storage areas as part of their pollution prevention program development.

Best Management Practices:

The following BMPs will be implemented for MCM-6:

- GH-1: Inventory of Facilities
- GH-2: Structural Control Maintenance
- GH-3: Employee Training
- GH-4: Disposal of Waste Material
- GH-5: Evaluate O&M Activities
- GH-6: Contractor Requirements and Oversight
- GH-7: POC Identification
- GH-8: Pollution Prevention Measures

Each BMPs measurable goals, responsible party and corresponding implementation schedules can be found in the following tables.

BMP FOR MCM-6	INVENTORY OF FACILITIES	GH-1
Responsible Party: Designated Representative	Description: Develop and maintain an inventory of facilities and stormwater controls that the County owns and operates including all applicable permit numbers, registration numbers and authorizations for each facility or control. The inventory must be made available for review by TCEQ and must adhere to the requirements set forth in TPDES General Permit No. TXR040000.	
Applicability: Pollution Prevention/ Good Housekeeping	Rationale: Maintaining a list of County-owned facilities will assist the County to identify potential pollutants and develop best management practices and stormwater controls aimed at reducing pollutants in stormwater runoff.	
Year(s) of Implementation:	Measurable Goals:	
Year 1 To be completed by December 31 of the implementation year.	• Develop an inventory for 100% of the County-owned and operated facilities and controls within the County.	
Years 2, 3, 4 and 5 To be completed by December 31 of each implementation year.	• Review and update the inventory at least one time per permit year to address changes or additions to the facilities and controls where applicable.	

BMP FOR MCM-6	STRUCTURAL CONTROL MAINTENANCE	GH-2
Responsible Party: Designated Representative	Description: Develop written procedures that define the frequency of inspections of structural controls occurring at least once annually and how they will be conducted. Perform maintenance for structural controls as needed to maintain the effectiveness of the BMP.	
Applicability: Pollution Prevention/ Good Housekeeping	Rationale: The upkeep and maintenance of structural controls ensures their long-term operation and effectiveness.	
Year(s) of Implementation: Years 1, 2, 3, 4, and 5 To be completed by December 31 of each implementation year.	Measurable Goals: • At least once per permit year, perform maintenance of 100% of the structural controls which require maintenance. The maintenance must follow a plan and schedule developed by the County. • Develop and maintain written procedures that define the frequency of inspections and how they will be conducted. • Review and update the maintenance procedures annually to address the changes or additions to the pollution prevention measures.	

BMP FOR MCM-6	EMPLOYEE TRAINING	GH-3
Responsible Party: Designated Representative	Description: Develop a training program to educate County employees on preventing or reducing pollutant runoff from municipal activities and municipally owned areas. The training must include the maintenance areas set forth in TPDES General Permit No. TXR040000.	
Applicability: Pollution Prevention/ Good Housekeeping	Rationale: Training programs for employees of the County should be focused on the potential sources of stormwater contamination and how to reduce the impact that County O&M activities have on water quality.	
Year(s) of Implementation: Years 1, 2, 3, 4, and 5 To be completed by December 31 of each implementation year.	Measurable Goals: • Conduct a minimum of one training annually for 100% of employees involved in implementing pollution prevention and good housekeeping practices. • Ensure training of 100% of applicable external contractor staff is conducted at least once a year using contract language or another similar method. • Maintain 100% of training materials and attendance lists.	

BMP FOR MCM-6	DISPOSAL OF WASTE MATERIAL	GH-4
Responsible Party: Designated Representative	Description: Dispose of waste materials within the County in accordance with 30 TAC Chapters 330 or 335, as applicable.	
Applicability: Pollution Prevention/ Good Housekeeping	Rationale: The responsible management of waste materials can significantly reduce the pollution of stormwater runoff.	
Year(s) of Implementation: Years 1, 2, 3, 4 and 5 To be completed by December 31 of each implementation year.	Measurable Goals: • Ensure that 100% of waste from the County is disposed of in accordance with 30 TAC Chapters 330 or 335, as applicable each year.	

BMP FOR MCM-6	EVALUATE O&M ACTIVITIES	GH-5
Responsible Party: Designated Representative	Description: Evaluate County operation and maintenance (O&M) activities for their potential to discharge pollutants in stormwater.	
Applicability: Pollution Prevention/ Good Housekeeping	Rationale: The County will ensure that their activities do not contribute to the pollution of stormwater runoff.	
Year(s) of Implementation: Years 1, 2, 3, 4, and 5 To be completed by December 31 of each implementation year.	Measurable Goals: • Evaluate 100% of O&M activities, in conjunction with procedure reviews, for their potential to discharge pollutants in stormwater annually including but not limited to: - Road and parking lot maintenance, including such areas as pothole repair, pavement marking, sealing, and re-paving; - Bridge maintenance, including such areas as re-chipping, grinding, and saw cutting; - Cold weather operations, including plowing, sanding, and application of deicing and anti-icing compounds and maintenance of snow disposal areas; and - Right of way maintenance, including mowing, herbicide and pesticide application, and planting vegetation.	

BMP FOR MCM-6	CONTRACTOR REQUIREMENTS AND OVERSIGHT	GH-6
Responsible Party: County Engineer	Description: Contractually require any contractors hired by the County to perform maintenance on County-owned facilities to comply with all of the stormwater control measures, good housekeeping practices, and facility-specific stormwater management operating procedures. Provide oversight of contractor activities to ensure that contractors are using appropriate control measures and standard operating procedures (SOPs). Oversight procedures must be maintained on-site and made available for inspection by TCEQ.	
Applicability: Pollution Prevention/ Good Housekeeping	Rationale: The regulation and oversight of contractors will assist in preventing the pollution of stormwater runoff during and after construction activities.	
Year(s) of Implementation: Years 1, 2, 3, 4, and 5 To be completed by December 31 of each implementation year.	Measurable Goals: • Each year, ensure that 100% of contractors hired by the County to perform maintenance activities on County-owned facilities is contractually required to comply with all of the stormwater control measures, good housekeeping practices, and facility-specific stormwater management operating procedures. • Implement oversight procedures of contractor activities in 100% of contracts to ensure that contractors are using appropriate control measures and SOPs each year. • Oversight procedures must be maintained on-site 100% of the time and made available for review by TCEQ within 24 hours of request.	

BMP FOR MCM-6	POC IDENTIFICATION	GH-7
Responsible Party: Designated Representative	Description: Identify pollutants of concern that could be discharged from operation and maintenance activities. Examples of pollutants are metals; chlorides; hydrocarbons such as benzene, toluene, ethyl benzene, and xylenes; sediment; and trash.	
Applicability: Pollution Prevention/ Good Housekeeping	Rationale: The identification of pollutants that are or could be discharged from the County's operation and maintenance activities is important in reducing the environmental impact of those activities if needed.	
Year(s) of Implementation: Years 1, 2, 3, 4, and 5 To be completed by December 31 of each implementation year.	Measurable Goals: • Identify pollutants of concern that could be discharged from all of the County's O&M activities and maintain a list of 100% of the pollutants identified. • Review and update the pollutants of concern list at least one time annually to address changes or additions to the O&M activities where applicable.	

BMP FOR MCM-6	POLLUTION PREVENTION MEASURES	GH-8
Responsible Party: Designated Representative	Description: Develop and implement a set of pollution prevention measures that will reduce the discharge of pollutants from County operation and maintenance activities. Implement plans to track the application of deicing and anti-icing compounds in the County and record the amount of compound used for each application. Implement plans to place barriers around or conduct runoff away from deicing chemical storage areas to prevent discharge into surface waters each year.	
Applicability: Pollution Prevention/ Good Housekeeping	Rationale: The County will ensure that the most effective pollution prevention measures are implemented into their day-to-day operations and will attempt to reduce pollution originating from deicing and anti-icing compounds used in operations.	
Year(s) of Implementation: Years 1, 2, 3, 4, and 5 To be completed by December 31 of each implementation year.	Measurable Goals: • Develop and implement a set of pollution prevention measures that will reduce the discharge of pollutants in stormwater from County-owned operations. • Track 100% of the application of deicing and anti-icing compounds in the County and record the amount of compound used for each application annually. • Place barriers around or conduct runoff away from 100% of deicing chemical storage areas to prevent discharge into surface waters each year.	

Conclusions:

Guadalupe County will implement, track, and assess each of the selected BMPs set forth in this SWMP. In accordance with the TPDES General Permit No. TXR040000, the County will undergo an annual assessment of each BMP and include their findings in the annual reports which will be posted onto the County website. If selected BMPs are found to be noneffective or other changes need to be made to this SWMP, a Notice of Change (NOC) will be submitted to the TCEQ prior to doing so. This SWMP will also be posted onto the County website within 30 days of approval of coverage under the General Permit.