



## 8.0 MCM6: Pollution Prevention and Good Housekeeping for Municipal Operations

### 8.1 Overview

Municipalities conduct a variety of activities throughout their daily operations, which have the potential to affect water quality throughout the community. With the adoption and implementation of stormwater management policies and procedures, the City of Sugar Land will protect stormwater quality and continue to deliver public services at the present service levels. A variety of municipal operations are affected by stormwater management policies and procedures. These municipal operations include, but are not limited to, parks maintenance, open space management, road and rights-of-way maintenance, water/wastewater utilities, fleet and building maintenance, city construction projects, and stormwater system maintenance. A summary of the BMPs are also provided in Table 8-1.

### 8.2 TPDES Phase II Permit Requirements

#### 8.2.1 Permittee-Owned Facilities and Control Inventory

Permittee-owned Facilities and Control Inventory as described by Part IV.D.6.(b)(1)

##### Measurable Goals

- Develop and maintain an annual inventory for 100% of the small MS4 owned and operated facilities and controls in the small MS4 area.
- Review and update the inventory at least one time annually to address changes or additions to the facilities and controls where applicable.

##### Evaluation

- Conduct annual inventory, document.
- Document and record review and any updates.

#### 8.2.2 Training and Education

Training and Education as described in Part IV.D.6.(b)(2)

##### Measurable Goals

- Conduct a minimum of one training annually for 100% of employees involved in implementing pollution prevention and good housekeeping practices.

##### Evaluation

- Conduct training and document number of attendees annually.

#### 8.2.3 Disposal of Waste Materials

Disposal of Waste Materials as described in Part IV.D.6.(b)(3).

**Measurable Goals**

- Ensure that 100% of waste from the MS4 is disposed of in accordance with 30 TAC Chapters 330 or 335, as applicable each year.

**Evaluation**

- Record waste records annually.

**8.2.4 Contractor Requirements and Oversight**

Contractor Requirements and Oversight as described in Part IV.D.6.(b)(4).

**Measurable Goals**

- Each year, ensure that 100% of contractors hired by the MS4 to perform maintenance activities on permittee owned facilities is 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).
- Implement oversight procedures of contractor activities in 100% of contracts to ensure that contractors are using appropriate control measures and Standard Operating Procedures (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.

**Evaluation**

- Maintain contracts, training logs, and pollution prevention meetings annually with contractors.
- Maintain contracts, training logs, and pollution prevention meetings annually with contractors.
- Maintain all records and available for TCEQ review, review annually.

**8.2.5 Assessment of Permittee-Owned Operations**

Assessment of permittee-owned operations as described in Part IV.D.6.(b)(5)a.

**Measurable Goals**

- Evaluate 100% of O&M activities, in conjunction with procedure reviews if appropriate, 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.
  - Right-of-way maintenance, including mowing, herbicide and pesticide application, and planting vegetation.

**Evaluation**

- Document annual evaluations of O&M activities.

### 8.2.6 Identify Pollutants of Concern

Identify pollutants of concern as described in Part IV.D.6.(b)(5)b.

#### Measurable Goals

- Identify pollutants of concern that could be discharged from all of the O&M activities described in Part IV.D.6.(b)(5)b and maintain a list of 100% of the pollutants identified.
- Including for example, metals; chlorides; hydrocarbons such as benzene, toluene, ethyl benzene, and xylenes; sediment; and trash.
- 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.

#### Evaluation

- Conduct annual review of pollutants of concern from all public works services.

### 8.2.7 Pollution Prevention Measures

Pollution Prevention Measures as described in Part IV.D.6.(b)(5)c.

#### Measurable Goals

- Develop and implement a set of pollution prevention measures that will reduce the discharge of pollutants in stormwater from the permittee-owned operations.
- Implement the following pollution prevention measures:
  - Track 100% of the application of deicing and anti-icing compounds in the MS4 area 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.

#### Evaluation

- Develop pollution measures.
- Record amount of compounds used and record barrier placements.

### 8.2.8 Inspection of Pollution Prevention Measures

Inspection of Pollution Prevention Measures as described in Part IV.D.6.(b)(5)d.

#### Measurable Goals

- At least one time annually, visually inspect 100% of pollution prevention measures implemented at permittee owned facilities to ensure they are working properly.
- Develop and maintain written procedures that describe the frequency of inspections and how they will be conducted.
- Review and update the inspection procedures at least one time annually to address changes or additions to the pollution prevention measures.

- Maintain a log of 100% of the inspections conducted annually and make the log available for review by the TCEQ within 24 hours of a request.

#### Evaluation

- Record inspections.
- Develop procedures, maintain.
- Document review and any updates.
- Record 100% of inspections, make available upon request.

### 8.2.9 Structural Control Maintenance

Structural Control Maintenance as described by Part IV.D.6.(b)(6).

#### Measurable Goals

- At least one time, annually, perform maintenance of 100% of the structural controls which require maintenance.
- Maintenance must follow a plan and schedule developed by the small MS4 operator to be consistent with maintaining the effectiveness of the BMP.
- The permittee shall develop and maintain written procedures that define the frequency of inspections and how they will be conducted.
- Review and update the maintenance procedures at least one time annually to address changes or additions to the pollution prevention measures.

#### Evaluation

- Document/record maintenance activities.
- Update and maintain schedule.
- Develop procedures and record any updates.
- Review and record updates.

### 8.2.10 Storm Sewer System Operation and Maintenance Program

Storm Sewer System Operation and Maintenance Program as described by Part IV.D.6.(c)(1)a.

#### Measurable Goals

- Develop and implement an O&M program to reduce to the MEP the collection of pollutants in catch basins and other surface drainage structures each year. Implement the following:
  - Inspect at least 20% of the small MS4 owned and operated stormwater inlets in problem areas identified by the small MS4 operator (for example, areas with recurrent illegal dumping) each year.
  - Inspect at least 25% of the small MS4 owned and operated detention basins each year.

**Evaluation**

- Compare number of inspected stormwater inlets to number of known inlets.
- Compare number of inspected owned/operated detention basins to number of known owned/operated detention basins

**8.2.11 Storm Sewer System Operation and Maintenance Problem Areas**

Storm Sewer System Operation and Maintenance Problem Areas as described by Part IV.D.6.(c)(1)b.

**Measurable Goals**

- Develop a list of 100% of the identified potential problem areas. Identify and prioritize problem areas for increased inspection (for example, areas with recurrent illegal dumping). Review and update the list of potential problem areas at least one time annually to address changes or additions to the list.

**Evaluation**

- Develop list, document and review annually.

**8.2.12 Operation and Maintenance Program to Reduce Discharges of Pollutants from Roads**

Operation and Maintenance Program to Reduce Discharges of Pollutants from Roads as described by Part IV.D.6.(c)(2).

**Measurable Goals**

- Implement the following:
  - A street sweeping and cleaning program to address 75% of the MS4 area where street sweeping is technically feasible annually. Ensure 100% of the MS4 area where street sweeping is technically feasible is addressed at least two times by the end of the permit term.
  - The following non-street sweeping control:
    - an inlet protection program addressing 100% of the small MS4 area where street sweeping is technically infeasible by the end of the permit term, which must include an implementation schedule and a waste disposal procedure.

**Evaluation**

- Identify coverage and schedule 75%, document activities.
- Document activities for the year.
- Develop inlet protection program, identify infeasible street sweeping areas, schedule and compare work completed to schedule.

**8.2.13 Mapping Facilities**

Mapping Facilities as described by Part IV.D.6.(c)(3).

**Measurable Goals**

- On a map of the area regulated under this general permit, identify where 100% of the permittee-owned and operated facilities and stormwater controls are located.
- Review and update the map at least one time annually to address changes or additions to the facilities and controls.

**Evaluation**

- Develop map, maintain.
- Document any revisions.

**8.2.14 Assessment of Facilities' Pollutant Discharge Potential**

Assessment of Facilities' Pollutant Discharge Potential as described by Part IV.D.6.(c)(4)a.

**Measurable Goals**

- Review 100% of the facilities identified in Part IV.D.6.(b) at least one time per permit term for their potential to discharge pollutants into stormwater.

**Evaluation**

- Conduct assessment of all facilities.

**8.2.15 Identification of High Priority Facilities**

Identification of high priority facilities as described by Part IV.D.6.(c)(4)b.

**Measurable Goals**

- Based on the assessment in Part IV.D.6.(c)(4)a., the permittee shall identify as high priority those facilities that have a high potential to generate stormwater pollutants. A list of 100% of the identified facilities must be developed and maintained each year.
- Review and update the list of high priority facilities at least one time annually to address changes or additions to the facilities.

**Evaluation**

- Develop list and update annually.
- Review list and record updates.

**8.2.16 Documentation of Assessment Results**

Documentation of Assessment Results as described by Part IV.D.6.(c)(4)c.

**Measurable Goals**

- Document the results of all the assessments and maintain copies of 100% of the site evaluation checklists used to conduct the assessments each year.
- The documentation must include the results of the permittee's initial assessment, and any identified deficiencies and corrective actions taken.

**Evaluation**

- Document assessment results and maintain copies.

**8.2.17 Development of Facility-Specific SOPs**

Development of Facility-Specific SOPs as described by Part IV.D.6.(c)(5).

**Measurable Goals**

- Develop facility-specific stormwater management SOPs for 100% of the MS4 owned and operated facilities. A description of 100% of the BMPs developed to comply with Part IV.D.6.(c)(6) must be included in each facility-specific SOP.
- Review and update the facility-specific SOPs at least one time annually to address changes or additions to the facilities.
- If requested, SOPs must be made available to TCEQ within 24 hours of the request for review.

**Evaluation**

- Develop SOPs for 100% of owned/operated facilities.
- Document annually/record any updates, have available upon request immediately.

**8.2.18 Stormwater Controls for High Priority Facilities, General Good Housekeeping**

Stormwater Controls for High Priority Facilities, General Good Housekeeping as described by Part IV.D.6.(c)(6)a.

**Measurable Goals**

- Shelter from exposure to stormwater 100% of material with a potential to contribute to stormwater pollution (such as fertilizers, solvents, paints, cleaners, automotive products, etc.) each year.

**Evaluation**

- Maintain shelters, document sheltered exposures in the inspection programs.

**8.2.19 Stormwater Controls for High Priority Facilities, De-icing and Anti-icing Material Storage**

Stormwater Controls for High Priority Facilities, De-icing and anti-icing material storage as described by Part IV.D.6.(c)(6)b.

**Measurable Goals**

- Ensure that 100% of stormwater runoff from storage piles of salt and other de-icing and anti-icing materials are not discharged each year.

**Evaluation**

- Review de-icing/anti-icing materials during cold weather events, maintain in activity SOPs.

### 8.2.20 Stormwater Controls for High Priority Facilities, Fueling and Vehicle

Stormwater Controls for High Priority Facilities, Fueling and vehicle maintenance as described by Part IV.D.6.(c)(6)c.

#### Measurable Goals

- Develop and implement SOPs that address spill prevention and spill control at 100% of permittee-owned and operated vehicle fueling, vehicle maintenance, and bulk fuel delivery facilities each year.
- Review and update the facility specific SOPs at least one time annually to address changes or additions to the facilities.

#### Evaluation

- Develop/Implement SOPs.
- Review SOPs and record any updates.

### 8.2.21 Stormwater Controls for High Priority Facilities, Equipment and Vehicle Washing

Stormwater controls for high priority facilities, equipment and vehicle washing as described by Part IV.D.6.(c)(6)d.

#### Measurable Goals

- Develop and implement SOPs that address equipment and vehicle washing activities at 100% of the permittee-owned and operated facilities where washing occurs.
- To ensure that wastewater is not discharged under this general permit, the permittee's SOP will include the following:
  - ceasing the washing activity (Cease washing at locations without designated washing stations).
- Review and update the facility specific SOPs at least one time annually to address changes or additions to the facilities.

#### Evaluation

- Develop SOPs.
- Document activities and locations where operations have ceased.
- Review and record updates.

### 8.2.22 Inspections

Inspections as described by Part IV.D.6.(c)(7).

#### Measurable Goals

- Develop and implement an inspection program, which at a minimum must include inspections of 100% of high priority permittee-owned facilities one time per year.

- The results of 100% of the inspections and observations must be documented and available for review by the TCEQ each year.

#### Evaluation

- Develop program and document inspections.
- Have all inspections/observations available upon immediate request.

### 8.2.23 Pesticide, Herbicide, and Fertilizer Applicator and Distributor Measures

Pesticide, Herbicide, and Fertilizer applicator and distributor measures as described by Part IV.D.6.(d)(1)b.(i).

#### Measurable Goals

- Require 100% of pesticide, herbicide, and fertilizer applicators and distributors working in the public spaces owned and operated by the permittee, including contract workers, to demonstrate training in application or distribution.

#### Evaluation

- Maintain documentation of training certificates, training logs, or certifications.

### 8.2.24 Landscape Maintenance

Landscape maintenance as described by Part IV.D.6.(d)(1)a.

#### Measurable Goals

- Evaluate at least one time each year the materials used, and activities performed on 100% of the public spaces owned and operated by the permittee for pollution prevention opportunities such as:
  - Parks,
  - Schools,
  - Golf courses,
  - Easements,
  - Public rights of way, and
  - Other open spaces.

#### Evaluation

- Evaluate materials and activities annually.

### 8.2.25 Non-Chemical Solutions

Non-chemical solutions as described by Part IV.D.6.(d)(1)b.(ii).

#### Measurable Goals

- Utilize at least one of the following non-chemical solutions each year in 100% of the public spaces owned and operated by the permittee:

- Use of native plants or xeriscaping in 10% of each public space’s landscaping area.
- Keep clippings and leave out the small MS4 and the street by implementing mulching, composting, or landfilling.
- Limit application of pesticides and fertilizers if precipitation is forecasted within 24 hours, or as specified in label instructions; or
- Reduce mowing of grass frequency to allow for greater pollutant removal but not jeopardizing motorist safety.

#### Evaluation

- Review and document which non-chemical solutions will be used, on-going.

### 8.2.26 Schedules for Chemical Application

Schedules for chemical application as described by Part IV.D.6.(d)(1)c.

#### Measurable Goals

- Develop and implement chemical application schedules for use in 100% of applicable public spaces owned and operated by the permittee each year. Schedules must minimize the discharge of pollutants from the chemical application due to irrigation and expected precipitation.

#### Evaluation:

- Develop and monitor/maintenance schedules.

### 8.2.27 Collection and Disposal of Pesticides, Herbicides, and Fertilizers

Collection and disposal of pesticides, herbicides, and fertilizers as described by Part IV.D.6.(d)(1)d.

#### Measurable Goals

- Ensure collection and proper disposal of 100% of the permittee’s unusable pesticides, herbicides, and fertilizers each year.

#### Evaluation

- Document disposal of 100% of unusable materials.

### 8.2.28 Evaluation of Flood Control Projects

Evaluation of Flood Control Projects as described by Part IV.D.6.(d)(2).

#### Measurable Goals

- Assess the impacts of the receiving water(s) for 100% of the flood control projects each year.
- 100% of new flood control structures must be designed, constructed, and maintained to provide erosion prevention and pollutant removal from stormwater.
- Retrofit 20% of the existing structural flood control devices each year to provide additional pollutant removal from stormwater shall be implemented unless infeasible.

- If it is not feasible for the small MS4 operator to retrofit 20% of the existing control devices each year, written documentation of the reason must be maintained and made available to the TCEQ for review upon request.

#### **Evaluation**

- Document and report assessment results.
- Document all new flood control structures that have been designed, constructed, and maintained.
- Compare the number of existing structures retrofit each year to total number of existing structures.

**Table 8-1. MCM6 - Pollution Prevention and Good Housekeeping for Municipal Operations**

Best Management Practice	Measurable Goals	Permit Years					Key Departments/Divisions	Evaluation	Tracking Tool
		1	2	3	4	5			
Permittee-owned Facilities and Control Inventory as described by Part IV.D.6.(b)(1).	Develop and maintain an annual inventory for 100% of the small MS4 owned and operated facilities and controls in the small MS4 area.						Public Works	Conduct annual inventory, document	Annually
	Review and update the inventory at least one time annually to address changes or additions to the facilities and controls where applicable.						Public Works	Document and record review and any updates	Annually
Training and Education as described in Part IV.D.6.(b)(2).	Conduct a minimum of one training annually for 100% of employees involved in implementing pollution prevention and good housekeeping practices.						Public Works	Document number of attendees annually	Annually
Disposal of Waste Material as described in Part IV.D.6.(b)(3).	Ensure that 100% of waste from the MS4 is disposed of in accordance with 30 TAC Chapters 330 or 335, as applicable each year.						Public Works	Record waste records annually	Annually
Contractor Requirements and Oversight as described in Part IV.D.6.(b)(4).	Each year, ensure that 100% of contractors hired by the MS4 to perform maintenance activities on permittee-owned facilities is 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).						Public Works/Procurement	Maintain contracts, training logs, and pollution prevention meetings annually with contractors	Annually
	Implement oversight procedures of contractor activities in 100% of contracts to ensure that contractors are using appropriate control measures and SOPs each year.						Public Works/Procurement	Maintain contracts, training logs, and pollution prevention meetings annually with contractors	Annually
	Oversight procedures must be maintained on-site 100% of the time and made available for review by TCEQ within 24 hours of request.						Public Works/Procurement	Maintain all records and available for TCEQ review, review annually	Annually

Best Management Practice	Measurable Goals	Permit Years					Key Departments/Divisions	Evaluation	Tracking Tool
		1	2	3	4	5			
Assessment of permittee-owned operations as described in Part IV.D.6.(b)(5)a.	<p>Evaluate 100% of O&amp;M activities, in conjunction with procedure reviews if appropriate, for their potential to discharge pollutants in stormwater annually including but not limited to:</p> <ul style="list-style-type: none"> <li>Road and parking lot maintenance, including such areas as pothole repair, pavement marking, sealing, and re-paving.</li> <li>Bridge maintenance, including such areas as re-chipping, grinding, and saw cutting.</li> <li>Cold weather operations, including plowing, sanding, and application of deicing and anti-icing compounds and maintenance of snow disposal areas.</li> <li>Right-of-way maintenance, including mowing, herbicide and pesticide application, and planting vegetation.</li> </ul>						Document annual evaluations of O&M activities	Annually	
Identify pollutants of concern as described in Part IV.D.6.(b)(5)b.	<p>Identify pollutants of concern that could be discharged from all of the O&amp;M activities described in Part IV.D.6.(b)(5)b and maintain a list of 100% of the pollutants identified.</p> <p>Including for example, metals; chlorides; hydrocarbons such as benzene, toluene, ethyl benzene, and xylenes; sediment; and trash.</p> <p>Review and update the pollutants of concern list at least one time annually to address changes or additions to the O&amp;M activities where applicable.</p>						Conduct annual review of pollutants of concern from all public works services	Annually	
Pollution Prevention Measures as described in Part IV.D.6.(b)(5)c.	<p>Develop and implement a set of pollution prevention measures that will reduce the discharge of pollutants in stormwater from the permittee-owned operations.</p> <p>Implement the following pollution prevention measures:</p> <ul style="list-style-type: none"> <li>Track 100% of the application of deicing and anti-icing compounds in the MS4 area and</li> </ul>						Develop pollution measures	Once a permit term	
							Record amount of compounds used and record barrier placements	Annually	

Best Management Practice	Measurable Goals	Permit Years					Key Departments/Divisions	Evaluation	Tracking Tool
		1	2	3	4	5			
	<p>record the amount of compound used for each application annually.</p> <ul style="list-style-type: none"> <li>Place barriers around or conduct runoff away from 100% of de-icing chemical storage areas to prevent discharge into surface waters each year.</li> </ul>								
Inspection of Pollution Prevention Measures as described in Part IV.D.6.(b)(5)d.	At least one time annually, visually inspect 100% of pollution prevention measures implemented at permittee- owned facilities to ensure they are working properly.						Record inspections	Annually	
	Develop and maintain written procedures that describe the frequency of inspections and how they will be conducted.						Develop procedures, maintain	Annually	
	Review and update the inspection procedures at least one time annually to address changes or additions to the pollution prevention measures.						Document review and any updates	Annually	
	Maintain a log of 100% of the inspections conducted annually and make the log available for review by the TCEQ within 24 hours of a request.						Record 100% of inspections, make available upon request	Annually	
Structural Control Maintenance as described by Part IV.D.6.(b)(6).	At least one time, annually, perform maintenance of 100% of the structural controls which require maintenance.						Document/record maintenance activities	Annually	
	Maintenance must follow a plan and schedule developed by the small MS4 operator to be consistent with maintaining the effectiveness of the BMP.						Update and maintain schedule	Annually	
	The permittee shall develop and maintain written procedures that define the frequency of inspections and how they will be conducted.						Develop procedures and record any updates	Annually	
	Review and update the maintenance procedures at least one time annually to address changes or additions to the pollution prevention measures.						Review and record updates	Annually	

Best Management Practice	Measurable Goals	Permit Years					Key Departments/Divisions	Evaluation	Tracking Tool
		1	2	3	4	5			
Storm Sewer System Operation and Maintenance Program as described by Part IV.D.6.(c)(1)a.	<ul style="list-style-type: none"> <li>Develop and implement an O&amp;M program to reduce to the MEP the collection of pollutants in catch basins and other surface drainage structures each year. Implement the following:                             <ul style="list-style-type: none"> <li>Inspect at least 20% of the small MS4 owned and operated stormwater inlets in problem areas identified by the small MS4 operator (for example, areas with recurrent illegal dumping) each year.</li> <li>Inspect at least 25% of the small MS4 owned and operated detention basins each year.</li> </ul> </li> </ul>						NA		Annually
							Public Works	Compare number of inspected stormwater inlets to number of known inlets	Annually
							Public Works	Compare number of inspected owned/operated detention basins to number of known owned/operated detention basins	Annually
Storm Sewer System Operation and Maintenance Problem Areas as described by Part IV.D.6.(c)(1)b.	Develop a list of 100% of the identified potential problem areas. Identify and prioritize problem areas for increased inspection (for example, areas with recurrent illegal dumping). Review and update the list of potential problem areas at least one time annually to address changes or additions to the list.						Public Works	Develop list, document and review annually	Annually
Operation and Maintenance Program to Reduce Discharges of Pollutants from Roads as described by Part IV.D.6.(c)(2).	<ul style="list-style-type: none"> <li>Implement the following:                             <ul style="list-style-type: none"> <li>A street sweeping and cleaning program to address 75% of the MS4 area where street sweeping is technically feasible annually.                                     <ul style="list-style-type: none"> <li>Ensure 100% of the MS4 area where street sweeping is technically feasible is addressed at least two times by the end of the permit term.</li> </ul> </li> <li>Implementing the following non-street sweeping control:                                     <ul style="list-style-type: none"> <li>an inlet protection program addressing 100% of the small MS4 area where street</li> </ul> </li> </ul> </li> </ul>						NA		
							Public Works	Identify coverage and schedule 75%, document activities	Annually
							Public Works	Document activities for the year	Annually
							NA		
						Public Works	Develop inlet protection program,	Annually	

Best Management Practice	Measurable Goals	Permit Years					Key Departments/Divisions	Evaluation	Tracking Tool
		1	2	3	4	5			
	sweeping is technically infeasible by the end of the permit term, which must include an implementation schedule and a waste disposal procedure,						identify infeasible street sweeping areas, schedule and compare work completed to schedule		
Mapping of Facilities as described by Part IV.D.6.(c)(3).	On a map of the area regulated under this general permit, identify where 100% of the permittee-owned and operated facilities and stormwater controls are located.						Develop map, maintain	Annually	
	Review and update the map at least one time annually to address changes or additions to the facilities and controls.						Document any revisions	Annually	
Assessment of Facilities' Pollutant Discharge Potential as described by Part IV.D.6.(c)(4)a.	Review 100% of the facilities identified in Part IV.D.6.(b) at least one time per permit term for their potential to discharge pollutants into stormwater.						Conduct assessment on all facilities	Once a permit term	
Identification of high priority facilities as described by Part IV.D.6.(c)(4)b.	Based on the assessment in Part IV.D.6.(c)(4)a., the permittee shall identify as <i>high priority</i> those facilities that have a high potential to generate stormwater pollutants. A list of 100% of the identified facilities must be developed and maintained each year.						Develop list and update annually	Annually	
	Review and update the list of high priority facilities at least one time annually to address changes or additions to the facilities.						Review list and record updates	Annually	
Documentation of Assessment Results as described by Part IV.D.6.(c)(4)c.	Document the results of all the assessments and maintain copies of 100% of the site evaluation checklists used to conduct the assessments each year. The documentation must include: <ul style="list-style-type: none"> <li>▪ The results of the permittee's initial assessment, and any identified deficiencies and corrective actions taken</li> </ul>						Document assessment results and maintain copies for 100% of sites evaluated	Annually	

Best Management Practice	Measurable Goals	Permit Years					Key Departments/Divisions	Evaluation	Tracking Tool
		1	2	3	4	5			
Development of Facility-Specific SOPs as described by Part IV.D.6.(c)(5).	Develop facility-specific stormwater management SOPs for 100% of the MS4 owned and operated facilities. A description of 100% of the BMPs developed to comply with Part IV.D.6.(c)(6) must be included in each facility-specific SOP.						Public Works	Develop SOPs for 100% of owned/operated facilities	Once a permit term
	Review and update the facility-specific SOPs at least one time annually to address changes or additions to the facilities.						Public Works	Document annually/record any updates, have available upon request immediately	Annually
	If requested, SOPs must be made available to TCEQ within 24 hours of the request for review.								
Stormwater Controls for High Priority Facilities, General Good Housekeeping as described by Part IV.D.6.(c)(6)a.	Shelter from exposure to stormwater 100% of material with a potential to contribute to stormwater pollution (such as, fertilizers, solvents, paints, cleaners, automotive products, etc.) each year.						Public Works	Maintain shelters, document sheltered exposures in the inspection programs	Annually
Stormwater Controls for High Priority Facilities, De-icing and anti-icing material storage as described by Part IV.D.6.(c)(6)b.	Ensure that 100% of stormwater runoff from storage piles of salt and other de-icing and anti-icing materials is not discharged each year.						Public Works	Review de-icing/anti-icing materials during cold weather events, maintain in activity SOPs	Annually
Stormwater Controls for High Priority Facilities, Fueling and vehicle maintenance as described by Part IV.D.6.(c)(6)c.	Develop and implement SOPs that address spill prevention and spill control at 100% of permittee-owned and operated vehicle fueling, vehicle maintenance, and bulk fuel delivery facilities each year.						Public Works	Develop/Implement SOPs	Annually
Stormwater Controls for High Priority Facilities, Equipment and vehicle washing as	Review and update the facility specific SOPs at least one time annually to address changes or additions to the facilities.						Public Works	Review SOPs and record any updates	Annually
	Develop and implement SOPs that address equipment and vehicle washing activities at 100% of the permittee-owned and operated facilities where washing occurs.						Public Works	Develop SOPs	Once a permit term

Best Management Practice	Measurable Goals	Permit Years					Key Departments/Divisions	Evaluation	Tracking Tool
		1	2	3	4	5			
described by Part IV.D.6.(c)(6)d.	<p>To ensure that wastewater is not discharged under this general permit, the permittee's SOP will include the following:</p> <ul style="list-style-type: none"> <li>ceasing the washing activity (Cease washing at locations without designated washing stations)</li> </ul>						Public Works	Document activities and locations where operations have ceased	Annually
Inspections as described by Part IV.D.6.(c)(7).	<p>Review and update the facility specific SOPs at least one time annually to address changes or additions to the facilities.</p> <p>Develop and implement an inspection program, which at a minimum must include inspections of 100% of high priority permittee-owned facilities one time per year.</p> <p>The results of 100% of the inspections and observations must be documented and available for review by the TCEQ each year.</p>						Public Works	Review and record updates	Annually
Pesticide, Herbicide, and Fertilizer applicator and distributor measures as described by Part IV.D.6.(d)(1)b.(i).	<p>Require 100% of pesticide, herbicide, and fertilizer applicators and distributors working in the public spaces owned and operated by the permittee, including contract workers, to demonstrate training in application or distribution</p>						Public Works	Develop program and document inspections	Annually
Landscape maintenance as described by Part IV.D.6.(d)(1)a.	<p>Evaluate at least one time each year the materials used, and activities performed on 100% of the public spaces owned and operated by the permittee for pollution prevention opportunities such as:</p> <ul style="list-style-type: none"> <li>parks,</li> <li>schools,</li> <li>golf courses,</li> <li>easements,</li> <li>public rights of way, and</li> <li>other open spaces.</li> </ul>						Public Works	Have all inspections/observations available upon immediate request	Annually
							Public Works	Maintain documentation of training certificates, training logs, or certifications	Annually
							Public Works	Evaluate materials and activities annually	Annually

Best Management Practice	Measurable Goals	Permit Years					Key Departments/Divisions	Evaluation	Tracking Tool
		1	2	3	4	5			
Non-chemical solutions as described by Part IV.D.6.(d)(1)b.(ii).	<p>Utilize at least one of the following non-chemical solutions each year in 100% of the public spaces owned and operated by the permittee:</p> <ul style="list-style-type: none"> <li>▪ Use of native plants or xeriscaping in 10% of each public space's landscaping area.</li> <li>▪ Keep clippings and leave out the small MS4 and the street by implementing mulching, composting, or landfilling.</li> <li>▪ Limit application of pesticides and fertilizers if precipitation is forecasted within 24 hours, or as specified in label instructions.</li> <li>▪ Reduce mowing of grass frequency to allow for greater pollutant removal but not jeopardizing motorist safety.</li> </ul>						Public Works	Review and document which non-chemical solutions will be used, on-going	Annually
Schedules for chemical application as described by Part IV.D.6.(d)(1)c.	Develop and implement chemical application schedules for use in 100% of applicable public spaces owned and operated by the permittee each year. Schedules must minimize the discharge of pollutants from the chemical application due to irrigation and expected precipitation.						Public Works	Develop and monitor/maintenance schedules	Annually
Collection and disposal of pesticides, herbicides, and fertilizers as described by Part IV.D.6.(d)(1)d.	Ensure collection and proper disposal of 100% of the permittee's unusable pesticides, herbicides, and fertilizers each year.						Public Works	Document disposal of 100% of unusable materials	Annually
Evaluation of Flood Control Projects as described by Part IV.D.6.(d)(2).	Assess the impacts of the receiving water(s) for 100% of the flood control projects each year.						Public Works/Engineering	Document and report assessment results	Annually
	100% of new flood control structures must be designed, constructed, and maintained to provide erosion prevention and pollutant removal from stormwater.						Public Works/Engineering	Document all new flood control structures that have been designed, and constructed, and maintained	Annually

Best Management Practice	Measurable Goals	Permit Years					Key Departments/Divisions	Evaluation	Tracking Tool
		1	2	3	4	5			
	<p>Retrofitting 20% of the existing structural flood control devices each year to provide additional pollutant removal from stormwater shall be implemented unless infeasible.</p> <ul style="list-style-type: none"> <li>▪ If it is not feasible for the small MS4 operator to retrofit 20% of the existing control devices each year, written documentation of the reason must be maintained and made available to the TCEQ for review upon request.</li> </ul>						Public Works/Engineering	Compare the number of existing structures retrofitted each year to total number of existing structures	Annually