Texas Pollutant Discharge Elimination System. Small Municipal Separate Storm Sewer System (MS4) Stormwater Management Program

TPDES PHASE II MS4 GENERAL PERMIT (TXR040000)

Williamson Travis Counties Municipal Utility District No. 1 Williamson and Travis Counties, Texas

MARCH 2022

#### Williamson Travis Counties Municipal Utility District No. 1 Small Municipal Separate Storm Sewer System Stormwater Management Program

#### I. Introduction

MS4 NAME –	Williamson Travis Counties MUD No. 1 (the " <b>District</b> ")
ENTITY TYPE –	Municipal Utility District
<b>EXECUTIVE OFFICER-</b>	President, Board of Directors
<b>DESIGNATED SIGNER</b> -	- President, Board of Directors
MAILING ADDRESS –	c/o McGinnis Lochridge
	111 W. 6th .Bldg. B, Suite 400
	Austin, Texas 78703
	(512)-495-6000
<b>POPULATION</b> –	Approximately 4,817
<b>OPERATOR LEVEL</b> –	Phase II Operator

**LOCATION** – Williamson Travis Counties Municipal Utility District No. 1 encompasses approximately 562 acres of land and is located in southwestern Williamson County and northwestern Travis County. The District lies approximately one mile southwest of the City of Cedar Park, Texas (the "City" or "Cedar Park") and approximately two miles due west of the intersection of U.S. highway 183 and Ranch Road 620/SH 45.

**ORGANIZATION** - A Board of Directors governs the District. Elected officials include a Board President, Vice-President, Secretary, Assistant Secretary and Treasurer. The Board hires outside consultants to handle engineering, legal, bookkeeping, and tax assessment services.

**ORDINANCES AND GUIDANCE** – The District lies entirely within the extraterritorial jurisdiction of Cedar Park. Therefore, all development in the District must comply with the City's rules and regulations.

**LEGAL AUTHORITY** – The District has the legal authority to enforce compliance with the Storm Water Management Program through the District's Order Establishing General Policies and Rules and Regulations with Respect to the District's Drainage Systems ("**Rules and Regulations**"). Other than the Board of Directors, the District does not employ any staff. The District contracts for services including engineering services, landscaping services, bookkeeping services, security services, and maintenance services.

**PROGRAM FUNDING** – The District will fund this program through its operating fund.

**LIMITATIONS ON PERMIT COVERAGE** – The District discharges storm water indirectly in to Cypress Creek and then into Lake Travis. The District also discharges waters into Buttercup Creek; and S. Brushy Creek Segment 1244D and ultimately to impaired Brushy Creek 1244 (5C – Bacteria from Recreational Use)

#### II. Minimum Control Measures (MCMs)

#### 1. Public Education, Outreach and Involvement on Stormwater Impacts

The Public Education and Outreach minimum measure consists of Best Management Practices (BMPs) that focus on the development of educational materials designed to inform the public about the impacts that storm water discharges have on local water bodies and the steps that the public can take to reduce pollutants in storm water runoff. The BMPs describe how individuals and households will be informed about the steps they can take to reduce storm water pollution; how individuals and groups will be informed on how to become involved in the storm water program; and the mechanisms that will be used to reach target audiences. The target audiences for the education program are specified in education-related BMPs described in the other minimum control measures. The target audiences were selected based on regulation requirements and based on the goal of educating the community about the impacts that storm water discharges have on local water bodies and the steps that the public can take to reduce pollutants in storm water runoff. The Public Education and Outreach program and BMPs, in combination, are expected to reach all of the constituents within the MS4's permitted boundary. The target pollutant sources are construction site runoff, impacts from new and re-development, illicit discharges and other pollutant sources identified to be of local concern, i.e. approved Total Maximum Daily Load (TMDL) parameters. Evaluation of the success of this minimum measure will be through careful analysis of the measurable goals for each BMP included in this minimum measure. Measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. The responsibility for implementation of this minimum measure is described with each BMP procedure.

#### **1.A.** Current Program

Williamson Travis Counties MUD No. 1 (the "**District**") has formed an Infrastructure Committee, which conducts regular meetings to evaluate the BMPs and MCMs included within its Stormwater Management Plan ("**SWMP**").

The District displays and distributes educational materials to the community via the district's website, <u>www.WTCMUD1.org</u>, water bill inserts and/or direct mail out and signage on stormwater facilities.

The District retains no staff and is managed by a publicly elected Board of Directors. Contractors perform all required operation and maintenance activities. The contractors are responsible for the training of their employees.

# **1.B.** Best Management Practices and Measurable Goals for Public Education, Outreach and Involvement on Stormwater Impacts

- 1.B.1. Stormwater Committee
  - Conduct regular Stormwater Committee meetings
  - Continue to invite and appoint members of the public, design, construction and development communities, MS4 personnel and other persons affected by various BMPs
  - Evaluate developed list of BMPs included in SWMP to determine if any additional topics would benefit by committee review
  - Annually report on the number of meetings and subjects discussed

#### 1.B.2. Distribute educational materials and information

The District will continue to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on local water bodies.

The District will make available to the community at regular public meetings educational stormwater brochures and other materials.

The District will continue to supply brochures to each Board Director and all consultants.

Relevant brochures will continue to be mailed out to the City of Cedar Park for mail out with utility bills, or brochures will be mailed out directly by the District to all residents.

The District will post the SWMP and all annual reports on the District's website <u>www.WTCMUD1.org</u>, as required.

1.B.3. Website

The District will update the existing District website to include current stormwater items and determine if additional information regarding pollution prevention should be included.

1.B.4. Public Education and Outreach

The District will identify and use existing programs to augment public information efforts.

1.B.5. Forming Partnerships

The District will identify existing programs or attempt to develop new ones, which involve cooperation and partnership with other agencies.

1.B.6. Community Clean-up Program

The District will promote participation in annual or semi-annual City of Cedar Park events to collect household hazardous waste (HHW). The City of Cedar Park holds regular collection events, which the District will help publicize.

1.B.7. Storm Drain Labeling

The District will begin a program of labeling of stormwater inlet structures with messages related to stormwater quality issues.

BMP	Activity/Measureable Goal	Date Due
Stormwater	• Meet hi-annually	December 2022 and 2023
Committee	• Evaluate BMPs included in SWMP annually	
	Maintain minutes and agendas of	December 2022 and 2023
	Stormwater Committee meetings	December 2022 and 2023
	<ul> <li>Post items on District website to determine if additional members would be interested in participation</li> </ul>	December 2022
Public Education	Review existing brochures to determine	December 2022
& Outreach	<ul> <li>if additional subjects should be included</li> <li>If deemed necessary by Stormwater Committee, develop and implement new brochure with additional subjects related to stormwater pollution Provention</li> </ul>	December 2022
	<ul> <li>Implement mail out process either through delivery of relevant brochures to the City of Cedar Park for mail out with utility bills, or through direct mail out by District to all residents</li> </ul>	Implement by June 2022, thereafter complete by December 2022 and 2023
	• Brochures to be supplied to each Board member and all consultants	December 2022 and 2023,
	• Organize annual presentation to Board members, consultants, general public, residents, and other interested groups on the requirements of the program	December 2022 and 2023
Website	• Review stormwater quality information included on District's website quarterly to determine if updates are needed; ensure inclusion of SWMP and annual reports	Quarterly, –in permit years 2022-2023
	<ul> <li>Post additional subjects related to SWMP implementation activities and opportunities for public participation on the District website</li> </ul>	December 2022
	• Continue website distribution of information	December 2022 and 2023
Outreach	Make stormwater quality fact sheets	December 2022 and 2023
Program	available upon request to the public	
Forming	• Seek to share ideas with other MUDs and with	December 2022
Partnerships	the City of Cedar Park	
Community Cleanup	• Publicize collection events on the District's website	December 2022 and 2023

# **1.C** Implementation Schedule - Public Education, Outreach and Involvement

Storm Drain	D	December 2022 and 2023
	• Review and assess storm labeling program to	December 2022 and 2023
Labeling	ensure all identified target areas or streets have	
	been included in the storm drain labeling program	
	• Identify groups that may be willing to participate	December 2022 and 2023
	in the storm drain labeling program	
	• Review and assess quality of all existing storm	
	drain labels to evaluate whether replacement is	
	needed	December 2022
	• Assess and identify 100% of storm drains needing	
	repair or replacement of storm drain labels	December 2022
	• Maintain adequate records of all stormwater	
	labeling and volunteer participation	December 2022 and 2023
	• Annually report on the total number of storm	
	drains labeled, as well as the repair or replacement	
	of any existing storm drain labels	December 2022 and 2023

#### 2. Illicit Discharge Detection and Elimination

The Illicit Discharge Detection and Elimination minimum control measure consists of Best Management Practices (BMPs) that focus on the detection and elimination of illicit discharges into the MS4. A storm sewer system map showing the location of all outfalls and the names and location of all receiving waters has been developed from existing mapping information. The BMPs describe procedures to develop and update a storm sewer system map showing the location of all outfalls and the names and location of all receiving waters; the legal authority mechanism (to the extent allowable by law) which will be used to effectively prohibit illicit discharges; public education regarding identifying, reporting and eliminating illicit discharge; procedures for locating priority areas; and procedures for removing the source of the illicit discharge. BMPs also focus on education and training of employees and the general public with regard to the hazards associated with illegal discharges and improper disposal of waste. Evaluation of the success of this minimum control measure will be through careful analysis of the measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. The responsibility for implementation of this minimum control measure is described with each BMP procedure.

#### 2.A. Current Program

Concurrently, the District's operator, Board members and/or the District's landscaper monitor the stormwater facilities on a regular basis. The District's contractors investigate drainage and other drainage infrastructure problems when requested by citizens. The District's maintenance contractor also reports drainage infrastructure problems as they are discovered.

# 2.B. Best Management Practices and Measurable Goals for Illicit Discharge Detection and Elimination Program

#### 2.B.1. Program to detect and eliminate illicit discharges

**Required:** A program to detect and eliminate illicit discharges to the MS4, including an ordinance or mechanism to effectively prohibit illicit discharges.

The District will satisfy the requirements of this section by implementing:

A program to detect and eliminate illicit discharges, including the development of Rules and Regulations to address illicit discharges to the MS4. The Rules and Regulations will prohibit illicit discharges and connections, all non-storm water discharges that significantly contribute pollutants to the MS4, and illegal dumping. It will include appropriate enforcement procedures and actions and will establish legal authority to carry out inspection surveillance and monitoring procedures necessary to ensure compliance with the Rules and Regulations. The Rules and Regulations will also identify a list of occasional incidental non-storm water discharges, if any, that will not be addressed as illicit discharges. Illicit discharges not covered by the Rules and Regulations (i.e., discharger is a non-resident of the District) will be enforced by referring the violator to the local enforcement authority with jurisdiction or to the TCEQ. The District shall include in the Rules and Regulations the following:

• Written procedures describing the basis for conducting inspections in response to

complaints and conducting follow-up inspections

• On-site procedures for responding to illicit discharges and spills.

#### 2.B.2. Non-stormwater discharges and illegal dumping detection plan

**<u>Required</u>**: A plan to detect and address non-stormwater discharges and illegal dumping to the MS4.

The District will actively patrol and inspect non-stormwater discharges, including illegal dumping into its MS4.

#### 2.B.3. Storm Sewer System Map

**<u>Required</u>**: A map of the storm sewer system which includes the location of conveyances, location of all major outfalls and the names and locations of all waters of the U.S. that receive discharges from the outfalls.

The District will develop a stormwater management system, which includes storm sewer mapping, and a district wide management system for stormwater permit compliance purposes. The SWMP will include maps of locations of all major outfalls and the names and location of all waters of the State, which receive discharges from the outfalls.

#### 2.B.4. Outfall Tracking System

Review and update the map of the MS4 system to ensure the inclusion of the locations of the following:

- MS4 receiving streams
- Stormwater Outfalls; and
- Permit Coverage Area.

#### 2.B.5. Outfall Screening

Using either hired contractors, or through other third-party arrangements or Board members, the regulated portion of the MS4 will be inspected for dry weather discharges. Wet weather screening will be used as necessary to monitor outfalls in areas of high rainfall.

Each outfall screening report will include the following:

- Location
- Dimensions
- Presence of silt, soil or trash in and around outfall
- Presence of dry weather flow through outfall
- Preliminary assessment of dry weather flow, i.e. odors, color, sheen, etc.

#### 2.B.6. Education and Training

**<u>Required</u>**: Implementation of a method for informing or training Board members that may come in contact and otherwise observe an illicit discharge or illicit connection to the to the MS4.

The District will develop a training program which describes the implementation of illicit discharge practices and procedures, regarding the observation of an illicit discharge or illicit connection to the MS4. This educational training program will be offered to all Board members and consultants, including the District's landscaper, on an annual basis.

#### 2.B.7. Illicit Discharge Documentation

A record will be made of each possible illicit discharge in which follow-up actions were required. The record will consist of a geographical point of reference, date, description of flow, and summary of follow up actions.

The District will develop detailed records of negative findings of dry weather inspections.

#### 2.B.8. Reporting

# <u>Required:</u> When an illicit discharge has been determined, the MS4 shall notify immediately the responsible party of the problem and shall require the responsible party to perform all necessary corrective actions.

If a possible illicit discharge is identified, the District will trace the flow upstream to the extent of District property. The District will report flows originating off district to the appropriate city, county, or other entity with jurisdiction for further action. In the event the flow appears to create a hazard or contain toxic or noxious substances, the District will report the flow to the TCEQ.

- Board members will be trained to report all possible illicit and non-stormwater discharges.
- Consultants, including the District's landscapers will be informed about identifying and reporting illicit discharges
- District to develop on-site procedures for responding to illicit discharges and spills.

#### 2.B.9. Inspections

**Required:** The District 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. Written procedures shall be developed describing the basis for conduction inspection in response to complaints and conducting follow-up requirements.

- The District will publicize and facilitate public reporting of illicit discharges or water quality impacts associated with discharges into or from the small MS4.
- The District will develop written procedures on the conducting of inspections in response to complaints, including follow-up inspections.

## 2.C. Implementation Schedule - Illicit Discharge Detection and Elimination

The implementation schedule must reflect the best management practices and activities to be implemented by the District for their Stormwater Management Program; the implementation schedule will become part of the District's MS4 Phase II general permit requirements.

Program	Measurable Goals	Date of Compliance
Illicit Discharge	• Develop Rules and Regulations	December 2022
Regulations/Order	• Adopt and implement Rules and Regulations	December 2022
Program to detect and eliminate illicit discharges	• Develop/update program to detect and eliminate illicit discharges	December 2022 and 2023
	• Publicize and facilitate public reporting of illicit discharges or water quality impacts associated into or from the MS4 via the District's website	December 2022
	• Respond to complaints received in Permit Years 1 through 5.	Respond within 60 days
	• Implement routine inspection program	
		December 2022
Plan to detect non- stormwater discharges and illegal dumping	• Develop plan to detect and address non-stormwater discharges and illegal dumping	December 2022
	• Implement plan	December 2022
	• Annual review of the plan to consider possible	December, 2022
	updates	December 2023
Storm Sewer Map	• Review and assess the map of the MS4 system to ensure the inclusion and location of the following: MS4 receiving streams; stormwater outfalls; and parmit coverage area	December 2022
	<ul> <li>Annual review and update of map</li> </ul>	December 2022 and 2023
Education and Training	• Develop a training program which describes the implementation of illicit discharge practices and procedures, regarding the observation of an illicit	June 2022
	<ul> <li>discharge or illicit connection to the MS4</li> <li>Conduct annual trainings of all Board members</li> </ul>	December 2022 and 2023

Outfall Screening	• Screen 50 percent of outfalls per year with 100% compliance in Permit Year 5.	December 2022 and 2023
	• Maintain records of outfall screenings for each year, including investigations for each outfall and any elimination activities	
	• Annually report on the number of outfalls screened, number of stormwater discharges, and elimination activities conducted under this program	

#### 3. Construction Site Storm Water Runoff Control MCM

The Construction Site Runoff minimum control measure consists of Best Management Practices (BMPs) that focus on the reduction of pollutants in any Stormwater runoff to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre (or from construction activity disturbing less than one acre but part of a larger common plan of development or sale that would disturb one acre or more). The BMPs describe measures to educate community residents and businesses regarding the prevention of construction site runoff; actions to educate regarding compliance; educational materials encouraging construction site operators to implement appropriate erosion and sediment control BMPs; educational materials encouraging construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter and sanitary waste at the construction site; educational materials encouraging procedures to incorporate the consideration of potential water quality impacts; and procedures for receipt and consideration of information submitted by the public. Evaluation of the success of this minimum control measure will be through careful analysis of the measurable goals for each BMP included in this minimum control measure. Where applicable, the District shall also reference and incorporate compliance with any Water Pollution Abatement Plan ("WPAP") required by, and in compliance with, the Edwards Aquifer Rule (30 TAC Chapter 213). Measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. The responsibility for implementation of this minimum control measure is described with each BMP procedure.

#### **3.A.** Current Program

The District implements various strategies to address stormwater runoff from construction sites per the previous SWMP. The District employs a District Engineer to review site plans, as needed. The TPDES permit program controls water pollution from construction activities by requiring a Stormwater Pollution Prevention Plan (SWPPP) at all construction sites, which disturb one acre or more of soil. Any construction activity within the district's boundary will be regulated under city of Cedar Park rules and regulations regarding stormwater pollution protection program.

The District implements the following construction contractor oversight activities:

The Board of Directors coordinates with the District Engineer regarding District construction and planning activities, develops and administers District-funded projects, and observes the construction of public improvements. District construction projects comply with the TPDES Construction General Permit No. TXR150000, as applicable.

In order for construction operators to gain permission to discharge runoff to the District, they must be in compliance with the TPDES Construction General Permit No. TXR150000. The District, operators will be required to submit a copy of their NOI and Storm Water Pollution Prevention Plan (SWPPP) to the Board and District Engineer.

The District adopted Rules and Regulations for its stormwater system that will include regulatory mechanisms to ensure compliance to the extent allowable under state, federal, and local law, to require erosion and sediment control. The Rules and Regulations require documentation and to maintain all records of enforcement actions.

#### **Erosion and Sedimentation Control**

Temporary and permanent BMPs designed to reduce and control erosion and sedimentation and minimize impacts created by stormwater runoff are used during construction.

Erosion control at District construction sites is accomplished by: Design steps to minimize bare soil exposure. Stabilize the soil with vegetation or other materials to hold it in place. Minimize the erosive velocities of stormwater runoff.

Sediment control is generally accomplished with BMPs such as silt fences and rock filter dams placed to capture moving sediments.

#### **3.B.** Best Management Practices and Measurable Goals for Construction Site Storm Water Runoff Control MCM

#### **3.B.1. Construction Storm Water Program BMPs**

**<u>Required</u>**: A program to reduce pollutants in stormwater runoff to the MS4 from construction activities and sanctions to ensure compliance to the extent allowable under State and local law.

a. District construction

The District requires that all its construction projects meet TCEQ TPDES Construction General Permit requirements.

#### 3.B.2. Site Plan Review BMP

**<u>Required</u>**: Develop procedures for site plan review, which incorporates consideration of potential water quality impacts.

The District will perform site plan review of its construction projects only. Pre-construction site plan reviews are conducted on all District projects. Written procedures will be included in the District's Stormwater System Rules and Regulations

#### 3.B.3. Consideration of Public Input BMP

**<u>Required</u>**: Develop procedures for receipt and consideration of information submitted by the public.

Current procedures will be evaluated and new procedures developed if necessary. The District's written procedures will be included in the District's Stormwater System Rules and Regulations.

#### **3.B.4. Site Inspection BMP**

**<u>Required</u>**: Develop procedures for site inspection and enforcement of control measures.

The District requires that all construction projects meet TCEQ TPDES Construction General Permit requirements including site inspection requirements.

Program	Activity (BMP)	Date Due
Construction Site Runoff Regulations/Order	<ul> <li>Develop Rules and Regulations</li> <li>Adopt and implement Rules and Regulations</li> </ul>	December 2022 December 2022
Public Information	<ul> <li>Review and assess topics in educational materials to determine if any additional construction information is needed.</li> <li>Review and assess procedures by which to receive and consider information from the public and include information in any construction educational materials and on the District's website</li> </ul>	December 2022 and 2023 December 2022
Construction Site Runoff Control	<ul> <li>Review requirements for contractors annually and rewrite, if necessary</li> </ul>	December 2022 and 2023

## 3.C. Implementation Schedule - Construction Site Storm Water Runoff Control MCM

#### 4. Post Construction Storm Water Management in New Development and Redevelopment

The Post-Construction Stormwater Management minimum control measure consists of Best Management Practices (BMPs) that focus of the prevention or minimization of water quality impacts from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale that discharge into the small MS4. The BMPs describe structural and/or non-structural practices; measures to educate community residents and businesses regarding the prevention of construction site runoff, which will be used to address post-construction runoff from new development and redevelopment projects; and educational material dissemination to ensure long term operation and maintenance of BMPs. Also included are BMPs focusing on education programs for developers and the general public with regard to project designs that minimize negative water quality impacts. Evaluation of the success of this minimum control measure. Measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. The responsibility for implementation of this minimum control measure is described with each BMP procedure.

## 4.A Current Programs

The District is built out and does not expect further development.

The District currently reviews and assesses the District's educational materials regarding postconstruction control measures and maintenance of post-construction control measures in areas of new and redevelopment to ensure no updates are necessary.

#### 4.B Best Management Practices and Measurable Goals for Post Construction Storm Water Management in New Development and Redevelopment MCM

4. B.1 Program to address stormwater runoff from new development and redevelopment projects, which discharge to the District's MS4.

**<u>Required</u>**: A program to address storm water runoff to the MS4 from new development and redevelopment projects that disturb greater than or equal to one acre.

The District's program will minimize water quality impacts and attempt to maintain pre-development runoff conditions. Primary water quality impacts are those related to changes in stormwater runoff quantity as impervious cover increases and potential water quality impacts due to constituent loadings associated with home construction.

## Optional Measurable Goals

- Identify adjacent property owners discharging into the District's MS4 and any water quality controls they may have.
- Develop water quality requirements for discharges from adjacent properties.
- Develop agreement with local city or county government or TCEQ.

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4. B.2 Strategies which include a combination of structural and non-structural BMPs

**Required:** Develop and implement strategies, which include structural and non-structural BMPs.

#### **Structural BMPs:**

The District's current program includes structural and non-structural BMPs. Permanent post construction stormwater BMPs available to the District include the following:

- Vegetated swales The District will continue to use grass swales where possible in medians and drainage ditches.
- Establishing and maintaining vegetation The District will continue its program of establishing and maintaining vegetation at the completion of construction activities.
- Permanent stabilization applied to unpaved areas (sodding, seeding, mulching with seed) The District will continue its program of establishing permanent stabilization at the completion of construction activities.
- Litter control The District will continue its litter control programs.
- Reduction of direct discharges
- Inlet signage

#### 4. B.3 Mechanism to address post-construction runoff

**Required:** Ordinance or other regulatory mechanism to address post-construction runoff to the extent allowable under State and local law. The District's Rules and Regulations will address post-construction runoff. In addition, the Rules and Regulations will document the District's plan to document and maintain all records of enforcement actions.

Permanent stabilization applied to unpaved areas (sodding, seeding, mulching with seed) – The District will continue its program of requiring establishment of permanent stabilization at the completion of construction activities.

Establishing and maintaining vegetation – The District will continue its program of requiring establishment of, and maintaining vegetation at the completion of construction activities.

4. B.4 Long-term operation and maintenance of BMPs

**<u>Required:</u>** Ensure adequate long-term operation and maintenance of BMPs.

The District inspects and maintains structural BMPs.

• Operation and maintenance procedures are upgraded as necessary.

# 4. D Implementation Schedule - Post Construction Storm Water Management in New Development and Redevelopment MCM

The implementation schedule must reflect the best management practices and activities to be implemented by the District for their Stormwater Management Program; the implementation schedule will become part of the District's MS4 Phase II Permit requirements.

Program	Activity (BMP)	Date Due
Address post-construction runoff	• Develop Rules and Regulations	December 2022
	• Adopt and implement Rules and Regulations	December 2022
	• Develop procedures to document and maintain records of enforcement actions	December 2022
New Development and Re- development stormwater	• Evaluate current non- structural BMPs	December 2022
program	• Evaluate current BMP inspection program	December 2022

#### 5. Pollution Prevention/Good Housekeeping MCM

The Pollution Prevention and Good Housekeeping minimum control measure consists of Best Management Practices (BMPs) that focus on training and on the prevention or reduction of pollutant runoff from municipal operations. The BMPs describe the use of available training materials available from the EPA, the TCEQ and other organizations; specific municipal operations that are impacted by the proposed operation and maintenance BMPs; a list of municipally-owned industrial facilities which require other Stormwater discharge permits; maintenance activities, schedules and long term inspection procedures for controls to reduce floatables and other pollutants; controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, waste transfer stations fleet or maintenance shops with outdoor storage areas; procedures for the proper disposal of waste removed from the MS4 and municipal operations, including dredge spoil, accumulated sediments, floatables and other debris; and procedures to ensure that new flood management projects are assessed for impacts on water quality and existing projects are assessed for incorporation of additional water quality protection devices or practices. Evaluation of the success of this minimum control measure will be through careful analysis of the measurable goals for each BMP included in this minimum control measure. Measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. The responsibility for implementation of this minimum control measure is described with each BMP procedure.

#### 5. A Current Program

The District implements various strategies and procedures to prevent or reduce pollutant runoff from municipal activities and municipally owned areas per the previous Storm Water Management Program (SWMP). Many Best Management Practices (BMPs) included in the previous SWMP will be continued in the new SWMP and focus on reducing the discharge of pollutants.

#### **Board member training**

The District will develop a training program, which describes the implementation of pollution prevention, and good housekeeping practices. This educational training program will be offered to all Board members and Consultants on an annual basis.

#### 5. B Best Management Practices and Measurable Goals for Pollution Prevention I Good Housekeeping

**<u>Required</u>**: Operation and maintenance program that identifies methods for conducting maintenance operations in ways that prevent and reduce pollution in stormwater runoff.

Reduce pollution of stormwater from maintenance operations

The District will continue to use the following methods, which reduce pollution from operations:

• Identify potential hazardous materials used in operations

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- Prioritized litter collection
- Utilize organic pesticides and herbicides, whenever possible.

#### 5.B.1. Controls to reduce or eliminate discharge of pollutants from operations

**<u>Required</u>**: Controls must be used to reduce or eliminate the discharge of pollutants from operations.

Evaluate existing controls and where possible introduce new ones, including:

- Work to reduce animal waste and floatables from entering the District's storm sewer system.
- Review District rules and policies to control pollutant discharges by any District facilities, contractors, or any other entity over which the District has operational control through inspection and enforcement

#### 5.B.2. Training

**<u>Required</u>:** Training of all Board members and Consultants.

The District will develop a program or document existing program for Board members and Consultants, which includes training materials directed at preventing and reducing storm water pollution.

The training program could include:

• Training on the impacts of storm water pollution.

#### 5.B.3. Structural Control Maintenance

• Structural facilities are inspected and/or maintained on a monthly basis.

#### 5.B.4. Disposal of waste

**Required:** Waste removed from the MS4, from structural controls, or collected as a result of operations and maintenance activities must be properly disposed.

Waste removed resulting from O&M activities is disposed of in accordance with state, county and/or rules and regulations.

**<u>Required:</u>** Procedures for disposal of wastes:

- Dredge spoil is to be stored on site until dry, then properly disposed at a landfill.
- Accumulated sediments to be properly disposed at a landfill.
- Floatables to be properly disposed at a landfill.

# 5.C. Implementation Schedule -Pollution Prevention I Good Housekeeping

The implementation schedule must reflect the best management practices and activities to be implemented by the Williamson Travis Counties MUD District for their Stormwater Management Program; the implementation schedule will become part of the District's MS4 Phase // permit requirements.

Program	Activity (BMP)	Date Due
Reduce discharge or pollutants into stormwater system	Work to reduce animal waste and floatables from entering the District's stormwater system	December 2022
Structural Control Maintenance	<ul> <li>Develop written procedures for inspecting and maintaining structural controls</li> <li>Conduct inspections of pollution prevention measures and maintain inspection log</li> </ul>	December 2022 December 2022 and 2023
Operation and Maintenance Stormwater Program	<ul> <li>Identify persons responsible for implementation of the program</li> <li>Identify potential hazardous materials, including develop and maintain inventory of stormwater facilities</li> <li>Identify existing and implement new methods to reduce stormwater pollution</li> <li>Evaluate existing and introduce new pollution controls</li> <li>Utilize organic pesticides and herbicides to the fullest extent possible</li> </ul>	December 2022
Education and Training	<ul> <li>Develop a training program which describes how to reduce stormwater pollution</li> <li>Conduct annual trainings of all Board members</li> </ul>	June 2022 December 2022 and 2023