

April 20, 2020

Texas Commission on Environmental Quality  
Stormwater Team Leader (MC-148)  
P.O. Box 13087  
Austin, Texas 78711-3087

Re: Phase II MS4 Annual Report Transmittal for the City of Schertz  
TPDES Authorization: TXR040241

Dear Team Leader:

This letter serves to transmit the required annual report for the Texas Pollutant Discharge Elimination System Small Municipal Separate Storm Sewer System General Permit, Authorization Number TXR040241 for the City of Schertz.

The annual report is for Year 1. The reporting period beginning December 13, 2018 and ending January 23, 2020.

A separate Notice of Change has not been submitted based on the fact that changes have not been proposed for the next permit year.

As required by the general permit, a copy of the report has been mailed to the TCEQ's regional office 13 in San Antonio, Texas.

Sincerely,



Dr. Mark Browne  
City Manager

## Phase II (Small) MS4 Annual Report Form

**TPDES General Permit Number TXR040000**

### A. General Information

Authorization Number: TXR040241

Reporting Year (year will be either 1, 2, 3, 4, or 5): 1

Annual Reporting Year Option Selected by MS4:

Calendar Year: \_\_\_\_\_

Permit Year: 2018-2019

Fiscal Year: \_\_\_\_\_ Last day of fiscal year: (\_\_\_\_\_)

Reporting period beginning date: (month/date/year) December 13, 2018

Reporting period end date: (month/date/year) January 23, 2020

MS4 Operator Level: 2 Name of MS4: City of Schertz

Contact Name: Dr. Mark Browne Telephone Number: 210-619-1000

Mailing Address: 10 Commercial Place, Bldg 2

E-mail Address: mbrowne@schertz.com

A copy of the annual report was submitted to the TCEQ Region: YES

Region the annual report was submitted to: TCEQ Region 13

### B. Status of Compliance with the MS4 GP and SWMP

1. Provide information on the status of complying with permit conditions:  
(TXR040000 Part IV.B.2)

	Yes	No	Explain
Permittee is currently in compliance with the SWMP as submitted to and approved by the TCEQ.	X		This report is based on current SWMP. New SWMP is currently in review for new authorization January 2019.
Permittee is currently in compliance with recordkeeping and reporting requirements.	X		
Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.).	X		
Permittee conducted an annual review of its SWMP in conjunction with preparation of the annual report	X		

2. Provide a general assessment of the appropriateness of the selected BMPs. You may use the table below to meet this requirement (**see Example 1 in instructions**):

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
1: Public Education, Outreach, and Involvement	1.1: Brochures and Fact Sheets	No this particular BMP does not seem to be appropriate because of the limited audience the handouts reached. In our new SWMP we have changed the goal of this BMP to be addressed through articles in the city's magazine and reach a larger audience.

<p><b>1: Public Education, Outreach, and Involvement</b></p>	<p><b>1.8 Volunteer Projects</b></p>	<p>Yes this BMP is appropriate for reduction of pollutants because provides an opportunity for resident's to dispose of hazardous and bulk waste in manner that ensures proper handling and disposal.</p>
<p><b>2: Illicit Discharge Detection and Elimination (IDDE)</b></p>	<p><b>2.1: Storm Sewer Map</b></p>	<p>Yes this is an appropriate BMP because with an up to date map, we can provide faster response for source tracking and cleanup in the event of an illicit discharge in the system.</p>
<p><b>3: Construction Site Stormwater Runoff Control</b></p>	<p><b>3.3 Construction Site Inspection Program</b></p>	<p>Yes, this is appropriate because an active monitoring of appropriate BMPs on all construction sites allows not only provides more control of the runoff from that particular project, but also provides more education to the appropriate operators that will be working more than likely transfer to other site the operators are responsible for.</p>
<p><b>4: Post-Construction Stormwater Management in New Development and Redevelopment</b></p>	<p><b>4.2 Site Review Program for Post-Construction Runoff</b></p>	<p>Yes, All site plans for the reporting period were reviewed for permanent stormwater runoff controls and permitted sites are required to achieve stabilization before closeout.</p>
<p><b>5: Pollution Prevention and Good Housekeeping for Municipal Operations</b></p>	<p><b>5.2: Municipal Employee Training</b></p>	<p>Yes, this year we provided educational opportunities for approximately 36 personnel in March and April 2019. Additionally, there was a specialized training for the Engineering inspectors on updates to the construction site inspection procedures.</p>

3. Describe progress towards achieving the goal of reducing the discharge of pollutants to the MEP. If no progress was made or the BMP did not result in a reduction in pollutants, provide an explanation. Use the table below to meet this requirement (**see Example 2 in instructions**):

<b>MCM</b>	<b>BMP</b>	<b>Information Used</b>	<b>Quantity</b>	<b>Units</b>	<b>Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)</b>
1	1.1: Brochures and Fact Sheets	Brochures to targeted Library, Visitor's Center, Public Works Building, City Hall, and available on website	205	Brochures	No, this BMP does not result in a direct reduction of pollutants, but education through the brochures can cause a change in practice for those it reaches.
2	2.2: Illicit Discharge Detection Plan	Outfall Inspections	17	Outfall Inspections	Yes, active inspections means when discharges are observed then tracking and removal can occur.
3	3.2: Site Plan Review Program	Site Plan and Construction Plan Submittals	41	Site Plan/Final Plat Reviews	No, this is not a direct reduction, but the review of the plans causes BMPs to be included in the planning of the project that if properly installed and maintained will result in reduction of pollutants.

3	3.3: Construction Site Inspection Program	Grading Permit Inspection Records	28	Issued Grading Permits	Yes, the inspection of active construction sites and enforcement of installing and maintaining BMPs results in a direct reduction in pollutants.
4	4.2: Site Review Program for Post-Construction Runoff	Site Plan and Construction Plan Submittals	41	Site Plan/Final Plat Reviews	No, although at site plan and final plat (construction plan review) permanent BMPs are assessed and planned for, the inspection program ensures permanent BMPs are installed and maintained.

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

<b>MCM(s)</b>	<b>Measurable Goal(s)</b>	<b>Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.</b>
1	Two Informational Articles Published in Schertz Magazine	Met Goal
1	Conduct two City-wide Cleanup Days	Met Goal
2	Inspect Outfall Annually	Met Goal
3	Review all Site Plans for Compliance	Met Goal

3	Perform Construction Site Inspection for all Permitted Sites	Met Goal
4	Review all Site Plans for Compliance	Met Goal
5	Provide Annual Municipal Staff Training	Met Goal: March and April Monthly Safety Meetings, additional training for Engineering Inspectors on Construction Site Inspection and Enforcement Program Updates
5	Sweep All City Streets	Exceeded Goal: Streets were swept twice a month generally.

### C. Stormwater Data Summary

Provide a summary of all information used, including any lab results (if sampling was conducted) to assess the success of the SWMP at reducing the discharge of pollutants to the MEP. For example, did the MS4 conduct visual inspections, clean the inlets, look for illicit discharge, clean streets, look for flow during dry weather, etc.?

- The City of Schertz has not conducted sampling as of yet, but the following activities are some criteria we use to assess the effectiveness of reduction of pollutants to the MEP. The City of Schertz visually inspects trash trap areas and other areas of concern on a quarterly basis (our routine maintenance schedule). This has been done at least quarterly over this permit year and at each rain event to ensure floatables and other pollutants do not reach our outfalls. Additionally, in areas around our City where dumping occurs more frequently are generally monitored on the same quarterly basis. This year we inspected and/or addressed as appropriate all concerns through the hotline and monitored these areas at least monthly to ensure pollutants are not discharged as a result of these known areas. The City of Schertz also monitored closely the sweeping of streets this permit year to ensure the reduction of pollutants to the MEP. Our goal is to sweep the streets monthly and in fact we swept them at least twice a month to ensure we were removing the potential pollutants. Finally, you can see in the goals section above that we successfully inspected all construction sites this year to work with the contractors to reduce the discharge of sediment or other pollutants from active job sites.

## **D. Impaired Waterbodies**

1. Identify whether an impaired water within the permitted area was added to the latest EPA-approved 303(d) list or the Texas Integrated Report of Surface Water Quality for CWA Sections 305(b) and 303(d). List any newly-identified impaired waters below by including the name of the water body and the cause of impairment.
  - No new stream segments have been identified.
2. If applicable, explain below any activities taken to address the discharge to impaired waterbodies, including any sampling results and a summary of the small MS4's BMPs used to address the pollutant of concern.
  - The City of Schertz has addressed the pollutant of concern, bacteria, in our impaired streams by the use of targeted BMPs. No TMDLs have been set for the water bodies discharged to. The pollutant of concern bacteria is targeted through brochures/fact sheets in public areas including Library, City Hall, Visitor's Center, and the Public Works' Building and magazine articles published in the city's magazine. The City also has signs in targeted areas such as City Parks addressing this pollutant.
3. Describe the implementation of targeted controls if the small MS4 discharges to an impaired water body with an approved TMDL.
  - There are no TMDLs in the stream the MS4 discharges to.
4. Report the benchmark identified by the MS4 and assessment activities:
  - MS4 has no TMDLs, see Measurable Goals section above.
5. Provide an analysis of how the selected BMPs will be effective in contributing to achieving the benchmark:
  - There are no TMDLs in the segment of streams the MS4 discharges to. The level of effectiveness will be measured by the goals section as described above including the outreach of the magazine articles and brochures, broadening educational/training programs to get information to as many people as practical.
6. If applicable, report on focused BMPs to address impairment for bacteria:



<b>Description of bacteria-focused BMP</b>	<b>Comments/Discussion</b>
Brochures/Fact Sheets focused on Bacteria	Placed in specified areas per SWMP and online.
Magazine Article focused on Pet Waste	Published in Schertz Magazine November 2019
Magazine Article Focused on Septic Systems	Published in Schertz Magazine January 2020

7. Assess the progress to determine BMP’s effectiveness in achieving the benchmark.

- See measurable goals section above.

<b>Benchmark Indicator</b>	<b>Description/Comments</b>
Municipal Staff Training	Additional Opportunity for training for Engineering Inspection in Construction Site Inspection Procedures
Construction Site Inspection	Increased frequency to quarterly.

### **E. Stormwater Activities**

Describe activities planned for the next reporting year:

<b>MCM(s)</b>	<b>BMP</b>	<b>Stormwater Activity</b>	<b>Description/Comments</b>
1	1.1	Publish Stormwater Magazine Article	Publish atleast two educational/informative magazine articles on stormwater topics

1	1.8	Conduct two City-wide waste collection events	Conduct two city-wide bulk and hazardous waste collection events for residents
2	2.1	Update Storm Sewer Map	Update map to include newly developed storm sewer infrastructure.
3	3.3	Construction Site Inspection	Conduct construction site inspections at least quarterly.
5	5.2	Municipal Employee Training	Provide training for field personnel and hotline staff.

## F. SWMP Modifications

1. The SWMP and MCM implementation procedures are reviewed each year.

- Yes
2. Changes have been made or are proposed to the SWMP since the NOI or the last annual report, including changes in response to TCEQ's review.
- Yes changes have been proposed in new SWMP in review now for 2019 permit renewal.

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

<b>MCM(s)</b>	<b>Measurable Goal(s) or BMP(s)</b>	<b>Implemented or Proposed Changes (Submit NOC as needed)</b>
1	Measurable Goal	Revise measurable goal to be Magazine article publication. Ability to reach a larger audience with magazine.
1	BMP	Volunteer Projects do not occur frequently enough for effectiveness. We will add a BMP to be specific to our semiannual city-wide cleanup days and track amount of waste collected.

3. Explain additional changes or proposed changes not previously mentioned (i.e. dates, contacts, procedures, annexation of land, etc.).
  - No additional changes proposed to this SWMP. Review in progress for new SWMP.

### **G. Additional BMPs for TMDLs and I-Plans**

Provide a description and schedule for implementation of additional BMPs that may be necessary, based on monitoring results, to ensure compliance with applicable TMDLs and implementation plans.

- No additional changes proposed for this SWMP.

### **H. Additional Information**

1. Is the permittee relying on another entity to satisfy any permit obligations?
  - No
- 2.a. Is the permittee part of a group sharing a SWMP with other entities?
  - No
- 2.b. If "yes," is this a system-wide annual report including information for all permittees?
  - No

### **I. Construction Activities**

1. The number of construction activities that occurred in the jurisdictional area of the MS4 (Large and Small Site Notices submitted by construction site operators):

24

- 2a. Does the permittee utilize the optional seventh MCM related to construction?
  - No

**J. Certification**

If this is this a system-wide annual report including information for all permittees, each permittee shall sign and certify the annual report in accordance with 30 TAC §305.128 (relating to Signatories to Reports).

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

Name (printed): Mark Bowne Title: City Manager

Signature: Mark Bowne Date: 4/21/20

Name of MS4: City of Schertz

**If you have questions on how to fill out this form or about the Stormwater Permitting program, please contact us at 512-239-4671.**

Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, contact us at 512-239-3282.