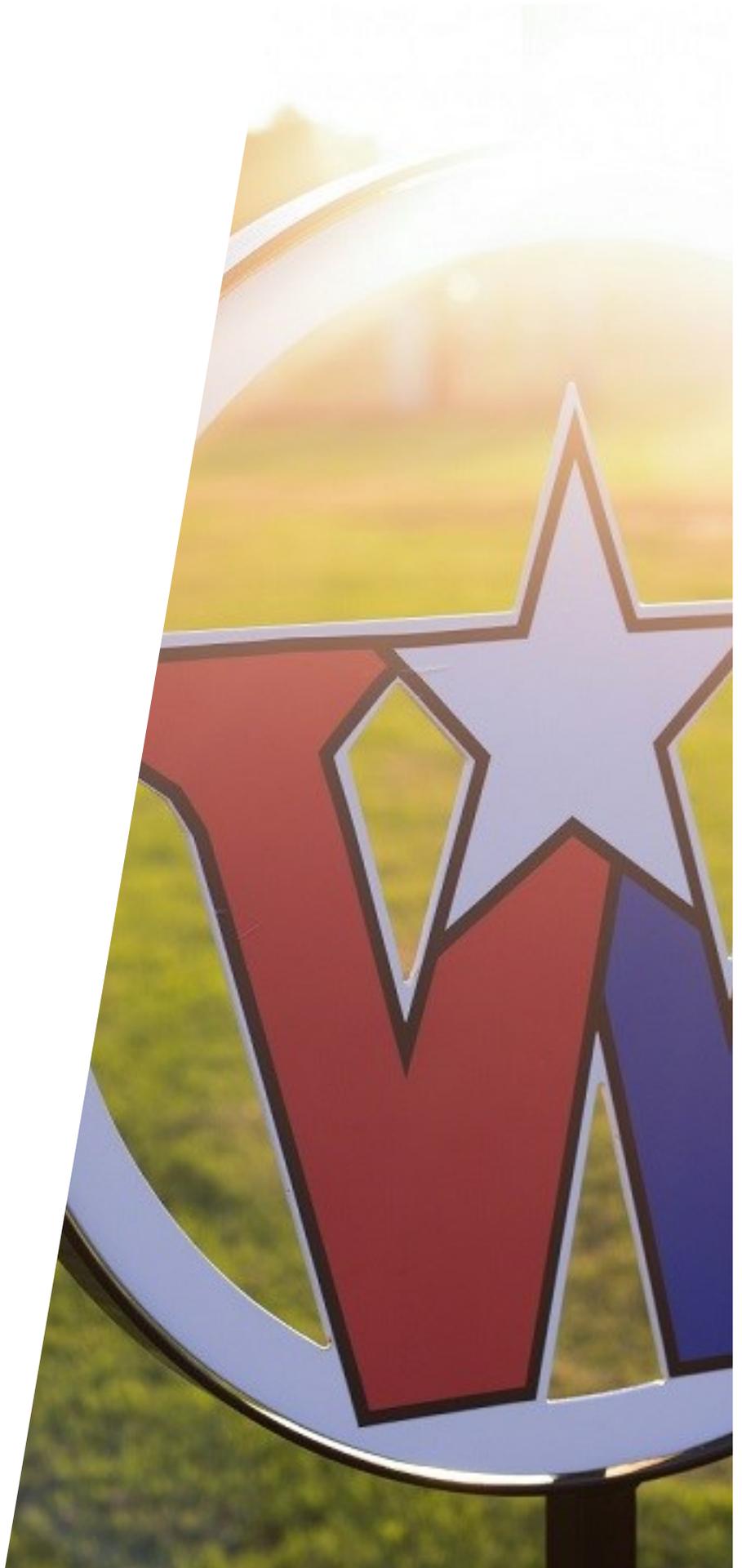


*STORMWATER  
MANAGEMENT  
PROGRAM –  
CITY OF  
WHITEHOUSE*

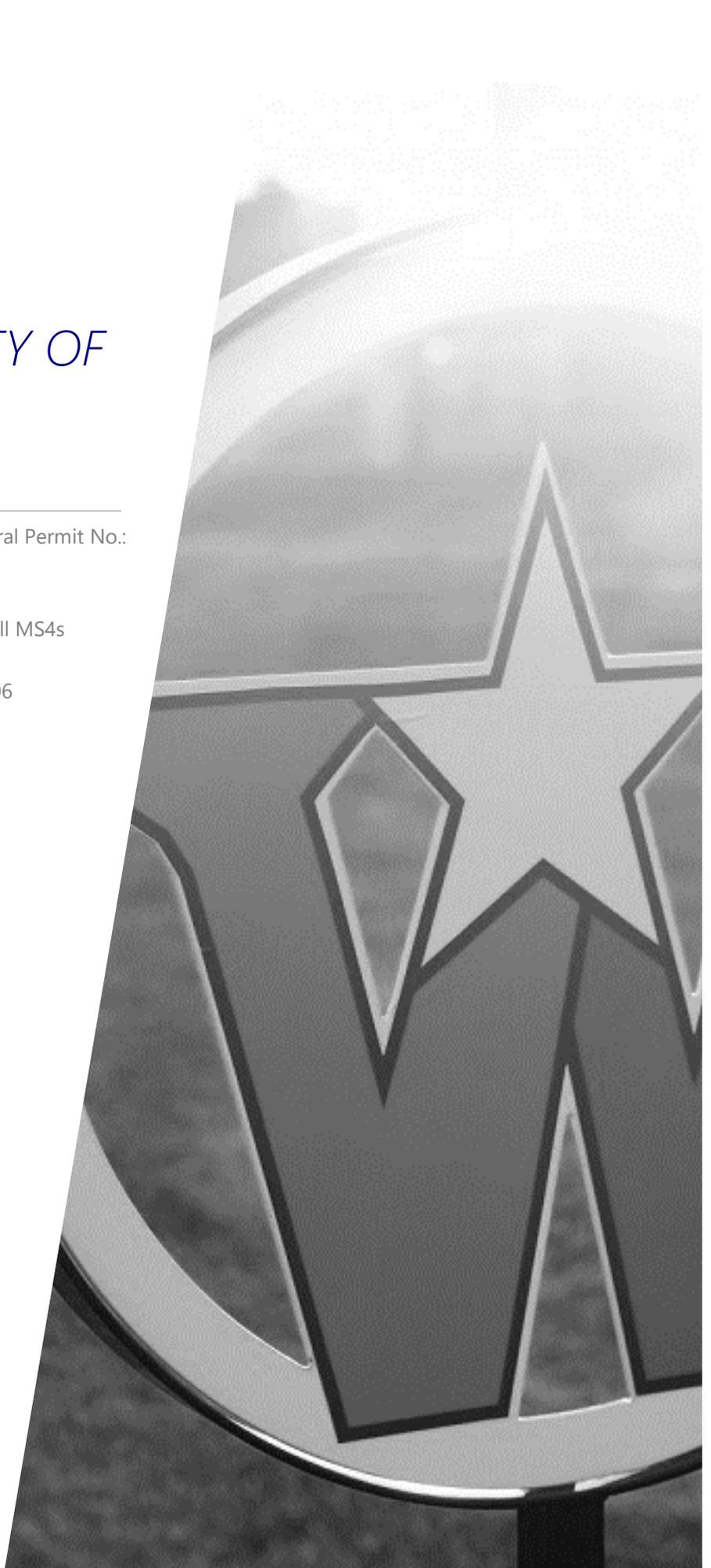


# STORMWATER MANAGEMENT PROGRAM – CITY OF WHITEHOUSE

DRAFT: Final  
Date: 2019-07-16  
City, County, State:  
Whitehouse,  
Smith County, Texas

TPDES General Permit No.:  
TXR040000  
TXR040496  
Phase II Small MS4s  
RS&H No.:  
112-0068-006

Prepared by RS&H, Inc. at the  
direction of the City of Whitehouse,  
Public Works Department for  
submittal to the Texas Commission  
on Environmental Quality.



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- Appendix D – TCEQ Compliance History

## LIST OF ACRONYMS AND ABBREVIATIONS

Best Management Practices .....	BMPs
City of Whitehouse .....	The City
Clean Water Act .....	CWA
Customer Reference Number .....	CN
Emergency Spill Response .....	ESR
Illicit Discharge Detection and Elimination .....	IDDE
Illicit Discharge Investigation .....	IDI
Maximum Extent Practicable .....	MEP
Metropolitan Planning Organization .....	MPO
Minimum Control Measures .....	MCM
Municipal Separate Storm Sewer System .....	MS4
National Pollutant Discharge Elimination System .....	NPDES
Notice of Intent .....	NOI
Operations and Maintenance .....	O&M
Pollutant of Concern .....	POC
Standard Operating Procedure .....	SOP
State Highway .....	SH
Stormwater Management Program .....	SWMP
Stormwater Pollution Prevention Plan .....	SWP3
Texas Commission on Environmental Quality .....	TCEQ
Texas Pollutant Discharge Elimination System .....	TPDES
Total Maximum Daily Load .....	TMDL
TPDES Construction General Permit .....	CGP or TXR150000
TPDES Multi-Sector General Permit .....	MSGP or TXR050000
TPDES Phase II MS4 General Permit TXR040000 .....	TXR040000
U.S. Fish and Wildlife Service .....	USFWS
Waters of the U.S. ....	WOTUS

# *1 INTRODUCTION*

## 1.1 STORMWATER MANAGEMENT PROGRAM (SWMP) OVERVIEW

This Stormwater Management Program (SWMP) has been developed for the City of Whitehouse (the City or Whitehouse) to meet the requirements of the National Pollutant Discharge Elimination System (NPDES) as prescribed in the Clean Water Act (CWA) and the Texas Pollutant Discharge Elimination System (TPDES) requirements within Chapter 26 of the Texas Water Code. This SWMP also addresses the issues important to the community and provides a framework for improving the health and welfare of all its inhabitants. The programs and goals identified in this SWMP are as comprehensive as possible within the confines of what is economically reasonable for this community's citizens. The City is submitting a Notice of Intent (NOI) and this SWMP to the Texas Commission on Environmental Quality (TCEQ) in accordance with the requirements of the TPDES Phase II municipal separate storm sewer system (MS4) General Permit TXR040000 (TXR040000) for obtaining authorization for stormwater discharges and certain non-stormwater discharges as a Level I MS4 Operator.

The objective of this SWMP is to describe the specific actions to be taken and the quantifiable goals to be achieved over a five (5) year period to reduce pollutants and protect the City's stormwater quality to the maximum extent practicable (MEP). The goals that need to be achieved in order to reach MEP pollutant reduction are referred to as minimum control measures (MCMs). The specific activities to be implemented to achieve the MCM goals are best management practices (BMPs). The SWMP sets a schedule for the implementation of the BMPs and defines the quantifiable results for the successful completion of each BMP. The City of Whitehouse is a Level 1 operator, as explained below, and is not a construction site operator for their municipal construction activities. As such, only MCMs 1 through 5 apply, and MCMs 6 and 7 are not included in this document.

## 1.2 DESCRIPTION OF AREA PROPOSED FOR PERMIT COVERAGE

The City of Whitehouse is located in Smith County within the Tyler Area Metropolitan Planning Organization (MPO) approximately 2.5 miles southeast of the City of Tyler. A map of the City limits is provided in Appendix A. The population of the City of Whitehouse as recorded in the 2010 U.S. Census was 7,660 (U.S. Census Bureau, 2019). As of July 1, 2018, the U.S. Census Bureau lists the population of the City as 8,799. The City of Whitehouse is a Level 1 operator of a traditional small MS4 because the MS4 serves a population less than 10,000 residents. Current U.S. Census maps are provided in Appendix A.

Whitehouse maintains an MS4 and there are no separate MS4s located within the City of Whitehouse. An MS4 is located outside of Whitehouse's city limit but within the Whitehouse Urbanized Area, and this is maintained and administered by Smith County. The City of Whitehouse's MS4 is not part of a coalition and this is not a shared SWMP with any other operators or MS4s.

### 1.2.1 Compliance History with TCEQ

The City of Whitehouse has an overall compliance classification of Satisfactory with an overall compliance history rating of 0.18 as of September 1, 2018. The customer reference number (CN) for the City of Whitehouse is CN600677363 and the reference number for the regulatory entity, namely the City of Whitehouse MS4, is RN105914618. The compliance classification for the City of Whitehouse MS4 is High

(NAICS Code 921190, SIC Code 9199, 4952) (TCEQ, 2018). Further records of the compliance history for the City of Whitehouse MS4 is provided in Appendix D.

The City of Whitehouse MS4 was authorized during the previous TPDES TXR040000 permitting cycle under permit number TXR040496 and is in compliance with the terms of that permit with the most recent annual report accepted as complete and sufficient by TCEQ. The City of Whitehouse submits annual reports based on the City's fiscal year, which ends on September 30. Annual reports are submitted to the executive director of TCEQ no later than 90 days from the close of the fiscal year (December 30).

### 1.2.2 Edwards Aquifer Recharge Zone

The City of Whitehouse, located in Smith County, is not within the Edwards Aquifer Recharge Zone or within influence of the Edwards Aquifer.

### 1.2.3 Receiving Waters and Impaired Waterbodies

Blackhawk Creek, a perennial freshwater stream, is the only waterbody that receives discharges from Whitehouse's MS4. The headwaters of Blackhawk Creek are west of State Highway (SH) 110 on the south side of the City of Whitehouse, and the stream flows to the southeast towards its confluence with Mud Creek (Segment ID 0611C) (TCEQ, 2019). Mud Creek eventually flows into the Angelina River (Segment ID 0611), and both Mud Creek and Blackhawk Creek are part of the Neches River Basin (Upper Neches Sub-basin).

Blackhawk Creek (Segment ID 0611G) is not listed as an impaired water on the *2014 Texas Integrated Report Index of Water Quality Impairments* (TCEQ, 2015), nor is it listed under the CWA Section 303(d) list of impaired waters or total maximum daily loads (TMDL) (USEPA, 2019). Mud Creek is however listed as Category 5b, which is defined as having impairments that may be suitable for the development of a TMDL (303(d) List), but a review of the standards needs to be conducted before a management strategy is selected. As such there is no approved TMDL for Mud Creek. Bacteria is the parameter for which Mud Creek is listed as a Category 5b, however, the impaired reaches of Mud Creek (Segment ID 0611C\_01) begin 29.8 river miles downstream of Blackhawk Creek, and no evidence was found to support the conclusion that Blackhawk Creek or the discharges from the Whitehouse MS4 contribute to these water quality impairments. Therefore, targeted controls (BMPs) for the reduction of the Pollutant of Concern (POC), namely bacteria, are deemed to be unnecessary.

### 1.2.4 Threatened and Endangered Species

Three species of birds listed by the U.S. Fish and Wildlife Service (USFWS) as threatened or endangered are known to occur within the boundaries of the City's jurisdiction. These species are:

- Least Tern (*Sterna antillarum*);
- Piping Plover (*Charadrius melodus*); and
- Red Knot (*Calidris canutus rufa*).

The City is not located within the critical habitat areas for any of these species, and all of these species are only listed as needing consideration for wind energy projects. No aquatic or aquatic dependent species are

listed for the receiving waters of the Whitehouse MS4. Therefore, the implementation of permitted stormwater discharge activities associated with this SWMP will have no effect on threatened or endangered species. The USFWS preliminary report (IPaC Resource List) is provided in Appendix B.

### 1.3 PUBLIC NOTICE REQUIREMENTS

Pursuant to TXR040000 and the NOI, the City of Whitehouse is required publish notice of the TCEQ executive director's preliminary decision on the NOI and the SWMP (TCEQ, 2019). The notice must be published at least once in a local newspaper of general circulation in the municipality or county where the MS4 is located. The public comment period begins on the first date the notice is published and lasts for at least thirty (30) days. The public may submit written comments to the TCEQ Office of Chief Clerk during this time regarding how the NOI or SWMP fails to meet the technical requirements or conditions of TXR040000. The notice will include, but is not limited to, the following items:

- The legal name of the MS4 operator;
- Statement whether the NOI is submitted for a new authorization or is a renewal of an existing authorization;
- The address of the applicant;
- A summary of the information within the NOI, including the location of the MS4 and a description of its receiving waters;
- Location and mailing address where the public may provide comments to TCEQ;
- The public location where the NOI, SWMP, and the executive director's general permit and fact sheet may be accessed and reviewed; and
- If required, the date, time, and location of any public meetings.

The local newspaper with the broadest community reach for the region is the Tyler Morning Telegraph, and this notice will be published there as well as on the City's website and social media pages. The notice will include information regarding how members of the public can submit comments regarding the SWMP and the NOI as well as request a public meeting. A public meeting will be held if TCEQ determines there is significant public interest. The NOI, SWMP, and annual reports will be made available for download on the City's stormwater webpage (<https://whitehousetx.org/city-services/stormwater/>) within the City of Whitehouse's website (<https://whitehousetx.org/>). The City will file a copy of the notice(s) and an affidavit of the publication(s) with the Office of Chief Clerk within sixty (60) days of receiving written instructions from the Chief Clerk.

If it is determined a public meeting is necessary or appropriate, the City will publish notice of the meeting on their website as well as in the local newspaper and on social media at least thirty (30) days before the meeting. The meeting will be held in Smith County in proximity to the City of Whitehouse. During the meeting, the City will describe the contents of the NOI and SWMP, distribute maps and supporting information regarding the MS4 and its operation, and provide forms for the public to submit comments and questions regarding the meeting's contents. A registration sheet will be available for the public to sign and provide their contact information, and this registration sheet will be provided to the TCEQ executive director.

*2 MCM 1 - PUBLIC EDUCATION,  
OUTREACH, AND  
INVOLVEMENT*

## 2.1 MCMS 1.A AND 1.B: PURPOSE AND NEED

The purpose of this program is to increase the public’s awareness of stormwater issues, and how these issues directly impact their daily lives and the health and wellbeing of their neighbors. In addition to educating the public on the impact stormwater quality has on their community, this program also seeks to inform the public on proactive steps they can take to improve the City’s stormwater quality. The City is a small community without a significant industrial component. Many of the residents work in Tyler and the surrounding towns, or own farms and small businesses around the City’s center. As such, the primary concerns surrounding stormwater pollution stem primarily from soil runoff from residential construction, household wastes, and litter.

## 2.2 IMPLEMENTATION OF MCMS 1.A AND 1.B

Through the implementation of the BMPs described in Table 1, the City of Whitehouse will educate the public of stormwater contamination issues relevant to them or their businesses, provide methods and strategies to minimize stormwater contamination both at home and in the workplace, and suggest ways in which the community can actively participate in implementing the stormwater management program. In addition to the other publications mentioned in Table 1, the City will develop three (3) inserts that focus on specific actions homeowners can take to reduce stormwater pollution. These documents will also be available for download from the City’s stormwater webpage within the City of Whitehouse website. These inserts will generally cover the following topics:

- Insert 1: Household Organic Waste Prevention and Water Conservation - Educate public on pet waste impacts and prevention, responsible lawn fertilizer and pesticide use, benefits and instructions for low impact gardening, and water conservation practices around the home.
- Insert 2: Household Inorganic Waste and Trash Prevention - Educate public on proper storage of trash receptacles, prevention of yard items from being blown or washed into nearby stormwater receptors, and erosion control measures to use during earthwork activities.
- Insert 3: General Stormwater Education - Provide general information regarding the impacts of polluted stormwater on the community and the local wildlife. Discuss potential impacts to aquatic fauna and drinking water supplies, the costs to residents from regulatory actions or clean up, and how to identify stormwater receptors in the community.

### PRINCIPAL OBJECTIVES :

1. Inform public employees, businesses, and the general public (the stakeholders) of the hazards of illegal discharges, improper waste disposal, and poor water quality on the health and wellbeing of the community;
2. Provide information on steps stakeholders can take to reduce pollutant discharges to the MS4 and improve the overall water quality within the City and in downstream receiving waters;
3. Develop programs for the public to actively participate in stormwater pollution prevention;
4. Involve various groups and interested parties in the cooperative development and implementation of educational programs; and
5. Evaluate the effectiveness of each BMP through quantifiable metrics of success.

**RESPONSIBLE PARTY:**

Office of City Manager and Public Works Department

**TABLE 1: PUBLIC EDUCATION, OUTREACH, AND INVOLVEMENT GOALS AND IMPLEMENTATION SCHEDULE**

<b>MCM 1.A: Public Education and Outreach</b>				
<b>BMP</b>	<b>Measurable Goal</b>	<b>Description</b>	<b>Reporting Year</b>	<b>Frequency</b>
1.1 Utility Bill Inserts	Complete documents, then arrange for publication and insertion into utility bills. Provide link on City's stormwater webpage for download.	Develop 3 inserts that focus on specific actions homeowners can take to reduce stormwater pollution.	September Year 1	Once
1.2 Utility Bill Inserts	Distribute the insert to 100% of the residential utility customers. Maintain records of distributions including which insert version was sent, the date, and the total number of households in distribution. Include record report in attachment to annual report for the given reporting year.	Alternate inserts in utility bills with distributions annually.	September Years 1 – 4 January 24 Year 5	Annually
1.3 City Issued Permit Insert	Complete composition of insert documents and arrange for inclusion into City permit applications.	Inserts discuss issues related to construction BMPs, business BMPs (e.g. restaurants, car washes, landscaping, etc.).	September Year 1	Once
1.4 City Issued Permit Insert	Include inserts as part of 100% of permit applications. Include record of number of each type of permit issued for the reporting year in annual report.	Inserts will be seen by business entities engaging in permitted actions within the City that have the potential to impact stormwater quality.	September Years 1 – 4 January 24 Year 5	Once
1.5 Posters and Brochures (Public Schools and Municipal Buildings)	Provide list of locations and duration of posting in annual reports.	Provide posters or brochures to the four (4) elementary schools, commons areas for City employees, and to municipal buildings for public viewing. Include instructions to access the City's stormwater website.	September Year 2	Once
1.6 Stormwater Webpage	Refresh links to educational materials and update with stormwater related events annually. Post at least 1 new	Provide links to TCEQ updates, classroom educational materials, and	September Years 1 – 4	Annually

	educational material or stormwater event Describe updates in annual report.	stormwater related events for community involvement.	January 24 Year 5	
<b>MCM 1.A: Public Education and Outreach (cont.)</b>				
<b>BMP</b>	<b>Measurable Goal</b>	<b>Description</b>	<b>Reporting Year</b>	<b>Frequency</b>
1.7 Social Media Blasts	Provide four (4) posts per year on the City's social media pages related to stormwater. Provide dates and brief description of content in annual report.	The City has social media pages viewed by the public. At least four (4) times per year, the City will post regarding stormwater pollution prevention, community involvement opportunities, or options for reporting illegal discharges.	September Years 1 -- 4 January 24 Year 5	Quarterly
<b>MCM 1.B: Public Involvement</b>				
<b>BMP</b>	<b>Measurable Goal</b>	<b>Description</b>	<b>Reporting Year</b>	<b>Frequency</b>
1.8 Stream Clean Up	Coordinate at least one (1) stream clean-up event. Provide date, number of participants, and location in annual report.	The City partners with Keep Whitehouse Beautiful for an annual clean-up event for Blackhawk Creek. The City will seek other opportunities to facilitate community groups to host clean-up events.	September Years 1 -- 4 January 24 Year 5	Annually
1.9 Incident Reporting Web Link	Record 100% of the number of complaints and the City's responses and actions, then include summary in annual report.	The City has a link on its stormwater webpage for reporting illegal dumping. In conjunction with the other BMPs for MCM 1, the City will reference this link in published materials to promote public usage.	September Years 1 -- 4 January 24 Year 5	Annually

*3 MCM 2 - ILLICIT DISCHARGE  
DETECTION AND ELIMINATION  
(IDDE)*

### 3.1 MCM 2: PURPOSE, NEED, AND PERMIT REQUIREMENTS

Per the stipulations of TXR040000, the City must develop, implement, and enforce a program with the goal of detecting, investigating, and eliminating illicit discharges to the MS4. This IDDE program must include:

- A current MS4 map with –
  - The locations of all MS4 outfalls discharging to Waters of the U.S. (WOTUS); and
  - The names and locations of all surface waters receiving MS4 discharges from outfalls;
- Protocols for training MS4 field staff;
- Procedures for tracing the source of an illicit discharge; and
- Standard practices for removing the source of the illicit discharge.

Although few discharges to the MS4 are considered allowable, the following list of non-stormwater discharges will not be considered illicit, and therefore allowable discharges:

- Water line flushing;
- Runoff or return flow from landscape or lawn irrigation using potable water, groundwater, or surface water;
- Discharges from potable water sources;
- Diverted stream flows;
- Rising groundwater or springs;
- Uncontaminated groundwater infiltration;
- Uncontaminated pumped groundwater;
- Foundation and footing drains;
- Air conditioning condensation;
- Water from crawl space pumps;
- Individual residential vehicle washing;
- Flows from wetlands / riparian areas;
- Dechlorinated swimming pool discharges;
- Street wash water (not including street sweeper wastewater);
- Discharges from emergency firefighting activities;
- Allowable discharges listed in 40 CFR 122.26(d)(2)(iv)(B)(1);
- Non-stormwater discharges specifically listed in the TPDES Multi-Sector General Permit (MSGP) TXR050000 or the TPDES Construction General Permit (CGP) TXR150000;
- Discharges authorized by a TPDES/NPDES permit or do not require a permit; and
- Incidental non-stormwater discharges not specifically addressed in TCEQ permits or regulations.

### 3.2 IMPLEMENTATION OF MCM 2

The City has a program to detect illicit discharges through dry weather screening surveys and the implementation of an illicit discharge reporting weblink posted on the City's stormwater webpage. A copy of the Stormwater Outfall Inspection Report Form to be used during dry weather screening surveys is provided in Appendix C. The City will also develop and disseminate an Illicit Discharge Investigation (IDI) standard operating procedure (SOP) manual to relevant City staff, and make the City's MS4 map readily

available to both staff and the public for detecting and reporting illicit discharges. A copy of this map is included in Appendix A of this document. An example form for the inspection of and response to public reports of illicit discharges is provided in Appendix C. Due to the small size of the community and relatively limited size of the stormwater sewer system, the IDI SOP will rely heavily on accurate maps of the City and the sewer system to locate illicit point source discharges to the MS4.

An SOP will also be developed regarding Emergency Spill Response (ESR) procedures, and training for appropriate staff will be provided for both ESR and IDI. The City is a small community, and therefore lacks the resources or staff to address emergency spills directly in most situations. Therefore, the City relies upon ESR staff from the neighboring community of Tyler, TX and Smith County. The ESR SOP will detail how to contain a spill until supporting ESR staff can arrive, limit public access to the hazardous area in the interim, and which regulatory agencies must be notified of the nature of the incident.

Whereas the City does not have a stormwater specific ordinance, the City does include stormwater discharge restrictions in several other ordinances addressing development, zoning, and property maintenance, among others. Each of these ordinances have methods and means for preventing illicit discharges or enforcing the cessation of discharges to the MS4. If an illicit discharge is identified, the responsible party will be notified, and actions will be taken by the City to the full extent provided by state and local law to impel the cessation of discharges. Should the situation continue, TCEQ will be promptly notified, and the City will coordinate with TCEQ on a resolution.

#### PRINCIPAL OBJECTIVES:

1. Update MS4 map and maintain as a living document available to both City staff and the general public;
2. Provide a resource for the public to report illicit discharges to the appropriate City authorities;
3. Perform routine visual surveys of the stormwater outfall for illicit discharges and utilize MS4 maps and local knowledge to locate the sources of illicit discharge;
4. Complete SOPs for distribution to applicable City staff for ESR and IDI;
5. Develop programs for the education of City staff regarding ESR and IDI;
6. Inform the public of proactive measures they can take to prevent and report illicit discharges; and
7. Evaluate the effectiveness of each BMP through quantifiable metrics of success.

#### RESPONSIBLE PARTY:

Office of City Manager and Public Works Department

**TABLE 2: IDDE GOALS AND IMPLEMENTATION SCHEDULE**

<b>MCM 2: Illicit Discharge Detection and Elimination (IDDE)</b>				
<b>BMP</b>	<b>Measurable Goal</b>	<b>Description</b>	<b>Reporting Year</b>	<b>Frequency</b>
2.1 MS4 Mapping	Update map to include 100% new developments and 100% of other changes and maintain record of changes. Post link to map on City's website for public access. Submit revised map and record of changes with annual report.	A stormwater infrastructure map exists, but should be a living document updated frequently to reflect the current extent and capacity. Making the map publicly available allows the community to participate in the monitoring process.	September Years 1 – 4 January 24 Year 5	Annually
2.2 Illicit Discharge Reporting	Provide phone number and link on City's website for the public to report an illicit discharge or dumping. Maintain a record of 100% all reported incidents and 100% investigate 100% of the reported illicit discharge or dumping provide record in annual report.	Advertise the hotline and website link on inserts described in MCM 1.A. Maintain a record of 100% of all reported incidents, the responsible party for responding to the report, actions taken, and the resolution of the issue.	September Years 1 -- 4 January 24 Year 5	Annually
2.3 Dry Weather Screening	Conduct visual survey quarterly during dry weather of the MS4 outfall. Provide documentation of screening results in annual report.	A visual survey will be conducted to identify non-stormwater inflows. If detected, suspicious discharges will be inspected utilizing MS4 and City maps to locate illicit dumping, direct connections, or areas where wastewater may be leaking into storm system.	September Years 1 -- 4 January 24 Year 5	Quarterly
2.4 Education and Training	Provide training once annually for field staff regarding illicit discharge detection and emergency spill response procedures. Provide documentation of attendees, dates, and subject material covered in annual report.	The standard operating procedures (SOP) for routine dry weather screening, illicit discharge reporting (IDI) investigation, and emergency spill response (ESR) will be provided to all relevant staff. Annual training covering SOPs for IDR investigation and ESR will be provided in person or online.	September Years 1 -- 4 January 24 Year 5	Annually

<b>MCM 2: Illicit Discharge Detection and Elimination (IDDE) (cont.)</b>				
<b>BMP</b>	<b>Measurable Goal</b>	<b>Description</b>	<b>Reporting Year</b>	<b>Frequency</b>
2.5 Emergency Spill Response (ESR) SOP	Develop ESR SOP and distribute to relevant City staff. Provide link to download ESR SOP on the City's website, and include link to document in the annual report.	ESR SOP will provide instructions on how to control a spill, PPE to be used by personnel, whom to contact for ESR assistance, and regulatory agencies who must be notified in the event of a spill and timeframes of notification.	September Year 1	Once
2.6 Illicit Discharge Investigation (IDI) SOP	Develop IDI SOP and distribute to relevant City staff. Provide link to download ESR SOP on the City's website, and include link to document in the annual report.	IDI SOP will provide instructions on how to investigate a suspected discharge, notify the responsible party or parties, report the incident to the relevant regulatory agencies, and enforce the City's ordinances.	September Year 1	Once
2.7 Social Media Blasts	Provide four (4) posts per year on the City's social media pages related to recycling programs, hazardous waste disposal opportunities, and penalties for illicit discharges. Provide dates and brief description of content in annual report.	The City has social media pages viewed by the public. At least four (4) times per year, the City will post regarding proper waste disposal opportunities, penalties and repercussions for illicit discharges, or options for reporting illegal discharges.	September Years 1 -- 4 January 24 Year 5	Quarterly

*4 MCM 3 - CONSTRUCTION SITE  
STORMWATER RUNOFF  
CONTROL*

## 4.1 MCM 3: PURPOSE, NEED, AND PERMIT REQUIREMENTS

Within the City of Whitehouse, control of construction site runoff in the form of either sediments or trash and debris is the most publicly visible element of the stormwater program. This element has the greatest potential to directly affect the citizens of the community in the form of mud-caked roads due to track-out from job sites; impaired water quality and clarity in private ponds and lakes of downstream landowners; occluded storm drains; litter; and other complaints. To protect the community's water quality and the property rights of its citizens, the City shall develop, implement, and enforce a construction site stormwater runoff control program for operators of small and large construction activities and construction activities that are part of a common plan of development including larger common plan, to prevent illicit discharges to the MS4 to the MEP.

## 4.2 IMPLEMENTATION AND ENFORCEMENT OF MCM 3

The City's program does or will include or incorporate procedures for: informing construction site operators of the requirements to comply with the TPDES Construction General Permit TXR150000, reviewing and approving Stormwater Pollution Prevention Plans (SWP3s) submitted by construction permit applicants, inspecting construction sites, and taking enforcement actions when warranted. When construction permits are submitted, potential water quality impacts are considered in the review process. Construction site operators must comply with the stipulations of the City's construction permit as well as the requirements of TXR150000, including but not limited to procedures for soil stabilization; BMPs for sediment and erosion control; prevention of track out of sediment; containment of wash waters; methods to prevent the discharge of hazardous chemicals from spills, leaks, or other discharges; containment of sanitary wastes; and proper trash and debris disposal. Illicit discharges of wash water, fuels, oils, soaps, solvents, or other hazardous materials is not allowed. A copy of the City's Stormwater Construction Site Inspection Report template is provided in Appendix C.

To enforce this program and ensure compliance, stipulations have been included in the City's codes and ordinances to the extent allowable by state and federal law. The public is also encouraged to report illegal construction activities (e.g. lack of BMPs for erosion control, excessive litter, etc.) that may discharge pollutants into the MS4. To advance the progress the City has already made and to further improve the program, the City is proposing the implementation of the BMPs listed in Table 3 below.

### PRINCIPAL OBJECTIVES:

1. Provide opportunities for construction operator outreach and education;
2. Promote continuing education on the most recent engineering BMPs and structures for reducing erosion and sediment runoff;
3. Perform random inspections of construction sites for compliance and routine follow-up inspections for infractions;
4. Incorporate construction site discharge reporting by the public into the IDI process described in MCM 2; and
5. Evaluate the effectiveness of each BMP through quantifiable metrics of success.

**RESPONSIBLE PARTY:**

Office of City Manager and Public Works Department

**TABLE 3: CONSTRUCTION STORMWATER RUNOFF CONTROL GOALS AND IMPLEMENTATION SCHEDULE**

<b>MCM 3: Construction Site Stormwater Runoff Control</b>				
<b>BMP</b>	<b>Measurable Goal</b>	<b>Description</b>	<b>Reporting Year</b>	<b>Frequency</b>
3.1 Construction Operator Outreach and Education	Create fact sheet to include with construction permit application outlining required BMPs as part of the TCEQ Construction General Permit. Post link to fact sheet on City's stormwater and permits webpages and provide link to the document in the annual report.	Fact sheet will cover common BMPs such as silt fencing required, detention basins, inlet protections, seeding of inactive areas and soil stockpiles, and others. Fact sheet will briefly cover repercussions of non-compliance.	September Year 2	Once
3.2 Construction Operator Education	Provide links on stormwater and / or permits webpages for additional information on Construction General Permit requirements, training opportunities, and alternative BMPs.	Links can direct to USEPA, TCEQ, or other websites with information regarding new BMP technologies, regulatory updates, or training opportunities.	September Year 3	Once
3.3 Construction Site Inspections	Conduct random inspections of 20% of active construction sites per year. If SWP3 issues are found, conduct weekly inspections until issues are resolved. Document inspections and provide information in annual report.	Construction sites will be chosen at random for inspection. Should SWP3 violations continue, the City may withhold occupancy permits or other relevant permits until issues are resolved.	September Years 1 -- 4 January 24 Year 5	Annually
3.4 Public Reporting	Provide link on permit webpage for public reporting of construction site discharges. Provide documentation for 100% of complaints and their resolution in the annual report.	Document complaints, follow up with construction site inspection, and resolve any BMP issues noted through ordinance enforcement or withholding of permits (e.g. occupancy permits).	September Years 1 -- 4 January 24 Year 5	Annually

*5 MCM 4 - POST-CONSTRUCTION  
STORMWATER MANAGEMENT IN  
NEW DEVELOPMENT AND  
REDEVELOPMENT*

## 5.1 MCM 4: PURPOSE AND NEED

The addition of impervious surfaces within a watershed have been shown through a significant body of research to increase the quantity of pollutants in stormwater as well as the volumes and velocities of runoff. Flooding events become more frequent and severe as stormwater has less time to infiltrate soils before being discharged into receiving waterbodies. The concentrations of sediments, nutrients, salts, heavy metals, pathogenic bacteria, and hydrocarbons are increased as they are no longer entrained and / or decomposed through biogeochemical processes. Research has shown the best methods for reducing sediment and pollutants, as well as frequency and severity of flooding, is to retain stormwater on-site to allow for sediment deposition, water infiltration into soils, and biogeochemical processing to occur.

## 5.2 IMPLEMENTATION AND ENFORCEMENT OF MCM 4

To advance the progress the City has already made during previous permitting cycles and to further improve the program, the City is proposing the implementation of the MCM BMPs listed in Table 4 below. Where possible and permissible by law, developers will be required to submit a BMP maintenance plan with their development permit to the City. Records documenting the implementation of this plan must be retained by the owner or operator and made available to the City or TCEQ upon request. This management practice will involve another inspection process conducted by the Engineering and Drainage Maintenance Department during their development construction inspections. The inspections are necessary to determine the effectiveness of a BMP, which can be significantly reduced by a lack of maintenance. If a maintenance issue is identified for a BMP that is not a part of a development's maintenance plan, the City's Street Department will perform the maintenance activities for the BMP or structure. Additional inspections and maintenance may result from citizen reporting and complaints through several of the previously mentioned BMPs, such as the reporting link on the Stormwater Webpage. Records of enforcement actions will be maintained by the City and provided in the appropriate annual report.

### PRINCIPAL OBJECTIVES:

1. Expand upon, implement, and enforce a program to control stormwater discharges from new developments and redevelopments that disturb one (1) acre (Ac) or more and construction activities that are part of a common plan of development including larger common plan;
2. Educate developers and the public on BMPs approved by the City as well as new and innovative methods and BMPs for retaining stormwater on-site and diminishing stormwater-conveyed pollution to receiving waters;
3. Conduct routine maintenance of structures and BMPs under the purview of the City;
4. Require the owners or operators of new developments to:
  - a. file a maintenance plan with the City as part of their development permit, and
  - b. retain documentation of maintenance actions to be made available upon request from the City or TCEQ; and
5. Continue to document and maintain records of enforcement actions both through logs of actions and their resolutions as well as through a routinely updated map of structural controls throughout the City.

MCM 4 – POST-CONSTRUCTION STORMWATER MANAGEMENT IN NEW  
DEVELOPMENT AND REDEVELOPMENT

**RESPONSIBLE PARTY:**

Office of City Manager and Maintenance Department

**TABLE 4: POST-CONSTRUCTION STORMWATER MANAGEMENT GOALS AND IMPLEMENTATION SCHEDULE**

<b>MCM 4: Post-Construction Stormwater Management in New Development and Redevelopment</b>				
<b>BMP</b>	<b>Measurable Goal</b>	<b>Description</b>	<b>Reporting Year</b>	<b>Frequency</b>
4.1 Developer Guidance Document	Create fact sheet to include with construction permit application. Post link to fact sheet on City's stormwater and permits webpages and provide link to the document in the annual report.	Fact sheet will cover green development alternatives and permanent BMPs for improving water quality in stormwater discharges.	September Year 2	Once
4.2 List of Appropriate BMPs	Develop list of appropriate BMPs and include with new development permits as well as for download from the City's permits and stormwater websites.	List will include appropriate, long-term BMPs for developments of various sizes.	September Year 3	Once
4.3 Inventory and Map of Structural Controls	Develop and update a map using GIS or similar software and an inventory of permanent BMPs. Maintain log for 100% of inspections and maintenance to submit with annual report.	Maintain a map of all locations of structural controls and keep records of inspections and enforcement actions. Require maintenance records by permittee and maintenance plan as a requirement for development permit.	– September Years 1 -- 4 January 24 Year 5	Annually

*6 MCM 5 - POLLUTION  
PREVENTION AND GOOD  
HOUSEKEEPING FOR MUNICIPAL  
OPERATIONS*

## 6.1 MCM 5: PURPOSE AND NEED

The City of Whitehouse is not only the operator of the MS4, but is also an active participant and member of the regulated community. As such, the City as much or more so than the public in general, must comply with TCEQ regulations and serve as an example of proactive effort. To this end, the City will develop and implement an operations and maintenance (O&M) program for preventing and reducing pollutant runoff from activities, facilities, and other areas owned by the City including but not limited to road and parking lot maintenance, bridge maintenance, cold weather operations, and right-of-way maintenance and any structural controls owned by the City". This document will stipulate which actions are routinely performed by the City and the responsible parties for that action's execution. The City is proposing the BMPs shown in Table 5 to continue to improve its O&M program.

## 6.2 IMPLEMENTATION AND ENFORCEMENT OF MCM 5

An inventory of facilities will be developed, maintained, and updated as appropriate. A map of City owned properties is shown in Appendix A. City employees receive adequate training and resources for performing good housekeeping practices to prevent the discharge of pollutants into the MS4. Training attendance records will be maintained by the City, and a summary of completed training will be provided in the annual report. The City will actively monitor stormwater pollution controls at City owned facilities such as fueling stations for City vehicles, vehicle washing facilities, and materials storage facilities and maintain inspection logs related to those facilities. City vehicles will be maintained in good working order to prevent unnecessary discharges from leaking fluids. Any hazardous materials (e.g. cans of paint, solvents, pesticides, herbicides, etc.) will be properly labeled and stored in a covered location with secondary containment to prevent incidental discharges which may be conveyed to a stormwater inlet. Wastes generated by the MS4 will be disposed of in the manner appropriate to maintain compliance with City, state, and federal law.

Landscaping SOPs will be developed for use at City owned properties, parks, and public spaces that address water usage and conservation; responsible application of herbicides and pesticides; promotion of native species for landscaping; and litter control. City parks will have a sufficient number of trash receptacles in good working order to promote litter reduction, and signage will be posted to promote their use.

Storm drains and inlets will be cleaned on a routine basis to reduce the amount of waste and trash discharged to the receiving waterbody. Maintenance logs will be kept to document which and when drains were cleaned; these logs will be provided in the annual reports. The City rarely engages in construction activities, but should the City begin a project with a soil disturbance component, the City will implement all appropriate BMPs and structural controls necessary to prevent pollution discharges in compliance with TPDES General Construction Permit TXR150000. Should contractors be hired to work on behalf of the City, they will be made aware of the City's O&M procedures and required to comply with the O&M policy and this SWMP. Inspections and enforcement will follow the procedures discussed in MCMs 3 and 4.

### PRINCIPAL OBJECTIVES:

1. Conduct O&M activities in a manner that eliminates or reduces pollutant discharges into the MS4 from City controlled sources;

MCM 5 – POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR  
MUNICIPAL OPERATIONS

2. Train personnel and educate contractors on ways to contribute to pollution prevention practices and good housekeeping procedures; and
3. Evaluate and record all activities for annual reporting and BMP success analysis.

**RESPONSIBLE PARTY:**

Office of City Manager, Public Works Department, and Maintenance Department

**TABLE 5: POLLUTION PREVENTION & GOOD HOUSEKEEPING GOALS AND IMPLEMENTATION SCHEDULE**

<b>MCM 5: Pollution Prevention &amp; Good Housekeeping for Municipal Operations</b>				
<b>BMP</b>	<b>Measurable Goal</b>	<b>Description</b>	<b>Reporting Year</b>	<b>Frequency</b>
5.1 Facilities Inventory	Develop an inventory of City owned facilities and areas to incorporate into O&M program. Provide a copy of the inventory in the annual report.	Inventory will include documentation of City owned facilities, areas, parks, etc., stormwater issues associated those facilities, routine actions to address those issues, and dates when issues were addressed.	September Year 1	Once
5.2 Facilities Inventory Update	Update inventory of 100% of City owned facilities and areas. Provide copy of updated inventory in annual reports.	If the City acquires new facilities, parks, etc., these areas will be added to the inventory, O&M document, and City maps.	September Years 2 – 4 January 24 Year 5	Annually
5.3 Fleet Vehicle Fueling and Washing	Document stormwater pollution controls at 100% City owned fueling facilities and 100% of washing facilities and the routine maintenance and upkeep of each. Provide maintenance logs with annual report.	Report will describe secondary containment measures, how and when they are cleaned, and provide SOPs for reporting and addressing discharges.	September Years 1 – 4 January 24 Year 5	Annually
5.4 Landscaping SOP	Develop SOP for responsible landscaping of City owned properties. Provide link to document on City's website and distribute to City's maintenance staff.	SOP will encourage the use of native vegetation for landscaping, water conservation regarding irrigation, low impact fertilizers and pesticides, etc.	January 24 Year 5	Once
5.5 Park Maintenance	Provide trash receptacles in City Parks and arrange for their routine collection. Post a minimum of one (1) sign in	Signs will be posted in areas readily visible to the public. Trash receptacles will have lids or other mechanisms of	September Year 3	Once

MCM 5 – POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR  
MUNICIPAL OPERATIONS

	each public park and public space regarding pet wastes and / or litter.	containment to prevent trash from being blown out / discharged.		
<b>MCM 5: Pollution Prevention &amp; Good Housekeeping for Municipal Operations</b>				
<b>BMP</b>	<b>Measurable Goal</b>	<b>Description</b>	<b>Reporting Year</b>	<b>Frequency</b>
5.6 Storm Drain Cleaning	20% of storm drains or ditches will be cleaned per year. Documentation of drains or ditches cleaned, when, and by whom will be provided in the annual report.	Storm drains and ditches will be cleaned on a routine basis to reduce waste discharges to receiving waterbodies and maintain the capacity and function of the stormwater system.	September Years 1 -- 4 January 24 Year 5	Annually

## *7 REPORTING REQUIREMENTS*

### 7.1 RECORD KEEPING

The City will retain all records, a copy of the TPDES general permit, the records of all data used to complete the NOI, and the documentation of fulfillment of the public participation requirements for a period of at least three (3) years, or for the remainder of the term of this general permit, whichever is longer. The City intends to submit these records to the executive director, only upon request. This SWMP (including a copy of the general permit) will be retained at a location accessible to the public and TCEQ during regular business hours as well as hosted on the City’s website for download.

### 7.2 GENERAL REPORTING

According to 30 TAC Section 305.125(9), any noncompliance which may endanger human health / safety or the environment will be reported by the City to TCEQ. Report of such information will be provided to the TCEQ Regional Office within 24 hours of becoming aware of the noncompliance. A written report will be provided by the permittee to the appropriate TCEQ Regional Office and to the TCEQ Enforcement Division (MC-224) within five (5) working days of becoming aware of the noncompliance. The written report will contain:

- A description of the noncompliance and its cause;
- The potential danger to human health or safety, or the environment;
- The period of noncompliance, including exact dates and times;
- If the noncompliance has not been corrected, the anticipated time it is expected to continue; and
- Steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance, and to mitigate its adverse effects.

If the City becomes aware it either submitted incorrect information or failed to submit complete information requested in the NOI or any other report, the City will promptly submit the correct information to the TCEQ.

### 7.3 ANNUAL REPORT

The MS4 operator, in this case the City of Whitehouse, will submit an annual report to the executive director within 90 days of the end of each reporting year. For the City of Whitehouse, the reporting year will be the City’s fiscal year as in previously approved permits. The City’s fiscal year begins on October 1 of each year, and the annual reporting schedule based upon this date is shown in Table 6.

**TABLE 6: REPORTING YEARS FOR THIS PERMIT CYCLE AND ANNUAL REPORT SCHEDULE**

Annual Report Schedule		
Reporting Year	Calendar Dates	Annual Report Due Date
1	October 1, 2019 to September 30, 2020	December 30, 2020
2	October 1, 2020 to September 30, 2021	December 30, 2021
3	October 1, 2021 to September 30, 2022	December 30, 2022
4	October 1, 2022 to September 30, 2023	December 30, 2023
5	October 1, 2023 to September 30, 2024	December 30, 2024

The annual report will address the activities, implemented BMPs, data collected, and reports of the previous reporting year. The first reporting year will last until the end of the fiscal year immediately following the issuance date of this permit. The City will make a copy of the annual report available for review by TCEQ upon request. The annual report will include:

- The status of the compliance with permit conditions, including:
  - An assessment of the appropriateness of the identified BMPs,
  - A description of progress towards the goal of reducing the discharge of pollutants to the MEP,
  - The measurable goals for each of the MCMs, and
  - An evaluation of the implementation of the measurable goals;
- A summary of the results of data collected and analyzed during the reporting period, including monitoring data used to assess the program's success at reducing pollutant discharges to the MEP;
- A summary of the stormwater activities the City plans to undertake during the next reporting year;
- Proposed changes to the SWMP, including any changes to BMPs or identified measurable goals;
  - A description and schedule for implementation of additional BMPs that may be necessary, based on monitoring results;
- If applicable, the City will provide notice if the City is relying on another government entity to satisfy some of its permit obligations; and
- The number of construction activities that occurred within the jurisdictional area of the small MS4.

MS4s authorized under the previous version of TXR040000 must prepare an annual report, whether or not the NOI and SWMP have been approved by the TCEQ. If the City has either not implemented or not begun to implement the SWMP because it has not received approval of the NOI and SWMP, then the annual report will include that information. The annual report will be submitted with the appropriate TCEQ reporting forms as approved by TCEQ. The annual report will be submitted to the following address:

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

A copy of the annual report will also be submitted to the TCEQ Regional Office serving the area of the regulated small MS4, unless the report is submitted electronically. Effective December 21, 2020, annual reports must be submitted using the online electronic reporting system available through the TCEQ website unless the permittee requests and obtains an electronic reporting waiver.

## 8 SWMP MCM PROGRAM SUMMARY

# SWMP MCM PROGRAM SUMMARY

The following tables list the measurable goals and BMPs for each reporting year.

**TABLE 7: STORMWATER MANAGEMENT PROGRAM SUMMARY YEAR 1**

<b>REPORTING YEAR 1</b>			
<b>BMP</b>	<b>BMP Name</b>	<b>Measurable Goal</b>	<b>Description</b>
<b>MCM 1.A: Public Education and Outreach / MCM 1.B: Public Involvement</b>			
<b>1.1</b>	<b>Utility Bill Inserts</b>	Complete documents, then arrange for publication and insertion into utility bills. Provide link on City's stormwater webpage for download.	Develop 3 inserts that focus on specific actions homeowners can take to reduce stormwater pollution.
<b>1.2</b>	<b>Utility Bill Inserts</b>	Maintain records of distributions including which insert version was sent, the date, and the total number of households in distribution. Include record report in attachment to annual report for the given reporting year.	Alternate inserts in utility bills with distributions annually.
<b>1.3</b>	<b>City Issued Permit Insert</b>	Complete composition of insert documents and arrange for inclusion into City permit applications.	Inserts discuss issues related to construction BMPs, business BMPs (e.g. restaurants, car washes, landscaping, etc.).
<b>1.4</b>	<b>City Issued Permit Insert</b>	Include inserts as part of permit applications. Include record of number of each type of permit issued for the reporting year in annual report.	Inserts will be seen by business entities engaging in permitted actions within the City that have the potential to impact stormwater quality.
<b>1.6</b>	<b>Stormwater Webpage</b>	Refresh links to educational materials and update with stormwater related events annually. Describe updates in annual report.	Provide links to TCEQ updates, classroom educational materials, and stormwater related events for community involvement.
<b>1.7</b>	<b>Social Media Blasts</b>	Provide four (4) posts per year on the City's social media pages related to stormwater. Provide dates and brief description of content in annual report.	The City has social media pages viewed by the public. At least four (4) times per year, the City will post regarding stormwater pollution prevention, community involvement opportunities, or options for reporting illegal discharges.
<b>1.9</b>	<b>Stream Clean Up</b>	Coordinate at least one (1) stream clean-up event. Provide date, number of participants, and location in annual report.	The City partners with Keep Whitehouse Beautiful for an annual clean-up event for Blackhawk Creek. The City will seek other opportunities to facilitate community groups to host clean-up events.
<b>1.10</b>	<b>Incident Reporting Web Link</b>	Record the number of complaints and the City's responses, then include summary in annual report.	The City has a link on its stormwater webpage for reporting illegal dumping. In conjunction with the other BMPs for MCM 1, the City will reference this link in published materials to promote public usage.

<b>MCM 2: Illicit Discharge Detection and Elimination (IDDE)</b>		
<b>2.1</b>	<b>MS4 Mapping</b>	<p>Update map to include new developments or other changes and maintain record of changes. Post link to map on City's website for public access. Submit revised map and record of changes with annual report.</p> <p>A stormwater infrastructure map exists, but should be a living document updated frequently to reflect the current extent and capacity. Making the map publicly available allows the community to participate in the monitoring process.</p>
<b>2.2</b>	<b>Illicit Discharge Reporting</b>	<p>Provide phone number and link on City's website for the public to report an illicit discharge or dumping. Maintain a record of all reported incidents and provide record in annual report.</p> <p>Advertise the hotline and website link on inserts described in MCM 1.A. Maintain a record of all reported incidents, the responsible party for responding to the report, actions taken, and the resolution of the issue.</p>
<b>2.3</b>	<b>Dry Weather Screening</b>	<p>Conduct visual survey quarterly during dry weather of the MS4 outfall. Provide documentation of screening results in annual report.</p> <p>A visual survey will be conducted to identify non-stormwater inflows. If detected, suspicious discharges will be inspected utilizing MS4 and City maps to locate illicit dumping, direct connections, or areas where wastewater may be leaking into storm system.</p>
<b>2.4</b>	<b>Education and Training</b>	<p>Provide training once annually for field staff regarding illicit discharge detection and emergency spill response procedures. Provide documentation of attendees, dates, and subject material covered in annual report.</p> <p>The standard operating procedures (SOP) for routine dry weather screening, illicit discharge reporting (IDI) investigation, and emergency spill response (ESR) will be provided to all relevant staff. Annual training covering SOPs for IDR investigation and ESR will be provided in person or online.</p>
<b>2.5</b>	<b>Emergency Spill Response (ESR) SOP</b>	<p>Develop ESR SOP and distribute to relevant City staff. Provide link to download ESR SOP on the City's website, and include link to document in the annual report.</p> <p>ESR SOP will provide instructions on how to control a spill, PPE to be used by personnel, whom to contact for ESR assistance, and regulatory agencies who must be notified in the event of a spill and timeframes of notification.</p>
<b>2.6</b>	<b>Illicit Discharge Investigation (IDI) SOP</b>	<p>Develop IDI SOP and distribute to relevant City staff. Provide link to download ESR SOP on the City's website, and include link to document in the annual report.</p> <p>IDI SOP will provide instructions on how to investigate a suspected discharge, notify the responsible party or parties, report the incident to the relevant regulatory agencies, and enforce the City's ordinances.</p>
<b>2.7</b>	<b>Social Media Blasts</b>	<p>Provide four (4) posts per year on the City's social media pages related to recycling programs, hazardous waste disposal opportunities, and penalties for illicit discharges. Provide dates and brief description of content in annual report.</p> <p>The City has social media pages viewed by the public. At least four (4) times per year, the City will post regarding proper waste disposal opportunities, penalties and repercussions for illicit discharges, or options for reporting illegal discharges.</p>
<b>MCM 3: Construction Site Stormwater Runoff Control</b>		
<b>3.3</b>	<b>Construction Site Inspections</b>	<p>Conduct random inspections of 20% of active construction sites per year. If SWP3 issues are found, conduct weekly inspections until issues are resolved. Document inspections and provide information in annual report.</p> <p>Construction sites will be chosen at random for inspection. Should SWP3 violations continue, the City may withhold occupancy permits or other relevant permits until issues are resolved.</p>

<p><b>3.4 Public Reporting</b></p>	<p>Provide link on permits webpage for public reporting construction site discharges. Provide documentation of complaints and their resolution in the annual report.</p>	<p>Document complaints, follow up with construction site inspection, and resolve any BMP issues noted through ordinance enforcement or withholding of permits (e.g. occupancy permits).</p>
<p><b>MCM 4: Post-Construction Stormwater Management for New Development and Redevelopment</b></p>		
<p><b>4.3 Inventory and Map of Structural Controls</b></p>	<p>Develop and update a map using GIS or similar software and an inventory of permanent BMPs. Maintain log of inspections and maintenance to submit with annual report.</p>	<p>Maintain a map of all locations of structural controls and keep records of inspections and enforcement actions. Require maintenance records by permittee and maintenance plan as a requirement for development permit.</p>
<p><b>MCM 5: Pollution Prevention &amp; Good Housekeeping for Municipal Operations</b></p>		
<p><b>5.1 Facilities Inventory</b></p>	<p>Develop an inventory of City owned facilities and areas to incorporate into O&amp;M program. Provide a copy of the inventory in the annual report.</p>	<p>Inventory will include documentation of City owned facilities, areas, parks, etc., stormwater issues associated those facilities, routine actions to address those issues, and dates when issues were addressed.</p>
<p><b>5.3 Fleet Vehicle Fueling and Washing</b></p>	<p>Document stormwater pollution controls at City owned fueling facilities and washing facilities and their routine maintenance and upkeep. Provide maintenance logs with annual report.</p>	<p>Report will describe secondary containment measures, how and when they are cleaned, and provide SOPs for reporting and addressing discharges.</p>
<p><b>5.6 Storm Drain Cleaning</b></p>	<p>20% of storm drains or ditches will be cleaned per year. Documentation of drains or ditches cleaned, when, and by whom will be provided in the annual report.</p>	<p>Storm drains and ditches will be cleaned on a routine basis to reduce waste discharges to receiving waterbodies and maintain the capacity and function of the stormwater system.</p>

**TABLE 8: STORMWATER MANAGEMENT PROGRAM SUMMARY YEAR 2**

<b>REPORTING YEAR 2</b>			
<b>BMP</b>	<b>BMP Name</b>	<b>Measurable Goal</b>	<b>Description</b>
<b>MCM 1.A: Public Education and Outreach / MCM 1.B: Public Involvement</b>			
1.2	<b>Utility Bill Inserts</b>	Maintain records of distributions including which insert version was sent, the date, and the total number of households in distribution. Include record report in attachment to annual report for the given reporting year.	Alternate inserts in utility bills with distributions annually.
1.4	<b>City Issued Permit Insert</b>	Include inserts as part of permit applications. Include record of number of each type of permit issued for the reporting year in annual report.	Inserts will be seen by business entities engaging in permitted actions within the City that have the potential to impact stormwater quality.
1.5	<b>Posters and Brochures (Public Schools and Municipal Buildings)</b>	Provide list of locations and duration of posting in annual reports.	Provide posters or brochures to the four (4) elementary schools, commons areas for City employees, and to municipal buildings for public viewing. Include instructions to access the City's stormwater website.
1.6	<b>Stormwater Webpage</b>	Refresh links to educational materials and update with stormwater related events annually. Describe updates in annual report.	Provide links to TCEQ updates, classroom educational materials, and stormwater related events for community involvement.
1.7	<b>Social Media Blasts</b>	Provide four (4) posts per year on the City's social media pages related to stormwater. Provide dates and brief description of content in annual report.	The City has social media pages viewed by the public. At least four (4) times per year, the City will post regarding stormwater pollution prevention, community involvement opportunities, or options for reporting illegal discharges.
1.8	<b>Stream Clean Up</b>	Coordinate at least one (1) stream clean-up event. Provide date, number of participants, and location in annual report.	The City partners with Keep Whitehouse Beautiful for an annual clean-up event for Blackhawk Creek. The City will seek other opportunities to facilitate community groups to host clean-up events.
1.9	<b>Incident Reporting Web Link</b>	Record the number of complaints and the City's responses, then include summary in annual report.	The City has a link on its stormwater webpage for reporting illegal dumping. In conjunction with the other BMPs for MCM 1, the City will reference this link in published materials to promote public usage.
<b>MCM 2: Illicit Discharge Detection and Elimination (IDDE)</b>			
2.1	<b>MS4 Mapping</b>	Update map to include new developments or other changes and maintain record of changes. Post link to map on City's website for public access. Submit revised map and record of changes with annual report.	A stormwater infrastructure map exists, but should be a living document updated frequently to reflect the current extent and capacity. Making the map publicly available allows the community to participate in the monitoring process.
2.2	<b>Illicit Discharge Reporting</b>	Provide phone number and link on City's website for the public to report an illicit discharge or dumping. Maintain a record of all reported incidents and provide record in annual report.	Advertise the hotline and website link on inserts described in MCM 1.A. Maintain a record of all reported incidents, the responsible party for responding to the report, actions taken, and the resolution of the issue.

2.3	<b>Dry Weather Screening</b>	Conduct visual survey quarterly during dry weather of the MS4 outfall. Provide documentation of screening results in annual report.	A visual survey will be conducted to identify non-stormwater inflows. If detected, suspicious discharges will be inspected utilizing MS4 and City maps to locate illicit dumping, direct connections, or areas where wastewater may be leaking into storm system.
2.4	<b>Education and Training</b>	Provide training once annually for field staff regarding illicit discharge detection and emergency spill response procedures. Provide documentation of attendees, dates, and subject material covered in annual report.	The standard operating procedures (SOP) for routine dry weather screening, illicit discharge reporting (IDI) investigation, and emergency spill response (ESR) will be provided to all relevant staff. Annual training covering SOPs for IDR investigation and ESR will be provided in person or online.
2.7	<b>Social Media Blasts</b>	Provide four (4) posts per year on the City's social media pages related to recycling programs, hazardous waste disposal opportunities, and penalties for illicit discharges. Provide dates and brief description of content in annual report.	The City has social media pages viewed by the public. At least four (4) times per year, the City will post regarding proper waste disposal opportunities, penalties and repercussions for illicit discharges, or options for reporting illegal discharges.
<b>MCM 3: Construction Site Stormwater Runoff Control</b>			
3.1	<b>Construction Operator Outreach and Education</b>	Create fact sheet to include with construction permit application outlining required BMPs as part of the TCEQ Construction General Permit. Post link to fact sheet on City's stormwater and permits webpages and provide link to the document in the annual report.	Fact sheet will cover common BMPs such as silt fencing required, detention basins, inlet protections, seeding of inactive areas and soil stockpiles, and others. Fact sheet will briefly cover repercussions of non-compliance.
3.3	<b>Construction Site Inspections</b>	Conduct random inspections of 20% of active construction sites per year. If SWP3 issues are found, conduct weekly inspections until issues are resolved. Document inspections and provide information in annual report.	Construction sites will be chosen at random for inspection. Should SWP3 violations continue, the City may withhold occupancy permits or other relevant permits until issues are resolved.
3.4	<b>Public Reporting</b>	Provide link on permits webpage for public reporting construction site discharges. Provide documentation of complaints and their resolution in the annual report.	Document complaints, follow up with construction site inspection, and resolve any BMP issues noted through ordinance enforcement or withholding of permits (e.g. occupancy permits).
<b>MCM 4: Post-Construction Stormwater Management for New Development and Redevelopment</b>			
4.1	<b>Developer Guidance Document</b>	Create fact sheet to include with construction permit application. Post link to fact sheet on City's stormwater and permits webpages and provide link to the document in the annual report.	Fact sheet will cover green development alternatives and permanent BMPs for improving water quality in stormwater discharges.
4.3	<b>Inventory and Map of Structural Controls</b>	Develop and update a map using GIS or similar software and an inventory of permanent BMPs. Maintain log of inspections and maintenance to submit with annual report.	Maintain a map of all locations of structural controls and keep records of inspections and enforcement actions. Require maintenance records by permittee and maintenance plan as a requirement for development permit.
<b>MCM 5: Pollution Prevention &amp; Good Housekeeping for Municipal Operations</b>			
5.2	<b>Facilities Inventory Update</b>	Update inventory of City owned facilities and areas. Provide copy of updated inventory in annual reports.	If the City acquires new facilities, parks, etc., these areas will be added to the inventory, O&M document, and City maps.

<p><b>5.3</b></p>	<p><b>Fleet Vehicle Fueling and Washing</b></p>	<p>Document stormwater pollution controls at City owned fueling facilities and washing facilities and their routine maintenance and upkeep. Provide maintenance logs with annual report.</p>	<p>Report will describe secondary containment measures, how and when they are cleaned, and provide SOPs for reporting and addressing discharges.</p>
<p><b>5.6</b></p>	<p><b>Storm Drain Cleaning</b></p>	<p>20% of storm drains or ditches will be cleaned per year. Documentation of drains or ditches cleaned, when, and by whom will be provided in the annual report.</p>	<p>Storm drains and ditches will be cleaned on a routine basis to reduce waste discharges to receiving waterbodies and maintain the capacity and function of the stormwater system.</p>

**TABLE 9: STORMWATER MANAGEMENT PROGRAM SUMMARY YEAR 3**

<b>REPORTING YEAR 3</b>			
<b>BMP</b>	<b>BMP Name</b>	<b>Measurable Goal</b>	<b>Description</b>
<b>MCM 1.A: Public Education and Outreach / MCM 1.B: Public Involvement</b>			
1.2	<b>Utility Bill Inserts</b>	Maintain records of distributions including which insert version was sent, the date, and the total number of households in distribution. Include record report in attachment to annual report for the given reporting year.	Alternate inserts in utility bills with distributions annually.
1.4	<b>City Issued Permit Insert</b>	Include inserts as part of permit applications. Include record of number of each type of permit issued for the reporting year in annual report.	Inserts will be seen by business entities engaging in permitted actions within the City that have the potential to impact stormwater quality.
1.6	<b>Stormwater Webpage</b>	Refresh links to educational materials and update with stormwater related events annually. Describe updates in annual report.	Provide links to TCEQ updates, classroom educational materials, and stormwater related events for community involvement.
1.7	<b>Social Media Blasts</b>	Provide four (4) posts per year on the City's social media pages related to stormwater. Provide dates and brief description of content in annual report.	The City has social media pages viewed by the public. At least four (4) times per year, the City will post regarding stormwater pollution prevention, community involvement opportunities, or options for reporting illegal discharges.
1.8	<b>Stream Clean Up</b>	Coordinate at least one (1) stream clean-up event. Provide date, number of participants, and location in annual report.	The City partners with Keep Whitehouse Beautiful for an annual clean-up event for Blackhawk Creek. The City will seek other opportunities to facilitate community groups to host clean-up events.
1.9	<b>Incident Reporting Web Link</b>	Record the number of complaints and the City's responses, then include summary in annual report.	The City has a link on its stormwater webpage for reporting illegal dumping. In conjunction with the other BMPs for MCM 1, the City will reference this link in published materials to promote public usage.
<b>MCM 2: Illicit Discharge Detection and Elimination (IDDE)</b>			
2.1	<b>MS4 Mapping</b>	Update map to include new developments or other changes and maintain record of changes. Post link to map on City's website for public access. Submit revised map and record of changes with annual report.	A stormwater infrastructure map exists, but should be a living document updated frequently to reflect the current extent and capacity. Making the map publicly available allows the community to participate in the monitoring process.
2.2	<b>Illicit Discharge Reporting</b>	Provide phone number and link on City's website for the public to report an illicit discharge or dumping. Maintain a record of all reported incidents and provide record in annual report.	Advertise the hotline and website link on inserts described in MCM 1.A. Maintain a record of all reported incidents, the responsible party for responding to the report, actions taken, and the resolution of the issue.
2.3	<b>Dry Weather Screening</b>	Conduct visual survey quarterly during dry weather of the MS4 outfall. Provide documentation of screening results in annual report.	A visual survey will be conducted to identify non-stormwater inflows. If detected, suspicious discharges will be inspected utilizing MS4 and City maps to locate illicit dumping, direct connections, or areas where wastewater may be leaking into storm system.

2.4	<b>Education and Training</b>	Provide training once annually for field staff regarding illicit discharge detection and emergency spill response procedures. Provide documentation of attendees, dates, and subject material covered in annual report.	The standard operating procedures (SOP) for routine dry weather screening, illicit discharge reporting (IDI) investigation, and emergency spill response (ESR) will be provided to all relevant staff. Annual training covering SOPs for IDR investigation and ESR will be provided in person or online.
2.7	<b>Social Media Blasts</b>	Provide four (4) posts per year on the City's social media pages related to recycling programs, hazardous waste disposal opportunities, and penalties for illicit discharges. Provide dates and brief description of content in annual report.	The City has social media pages viewed by the public. At least four (4) times per year, the City will post regarding proper waste disposal opportunities, penalties and repercussions for illicit discharges, or options for reporting illegal discharges.
<b>MCM 3: Construction Site Stormwater Runoff Control</b>			
3.2	<b>Construction Operator Education</b>	Provide links on stormwater and / or permits webpages for additional information on Construction General Permit requirements, training opportunities, and alternative BMPs.	Links can direct to USEPA, TCEQ, or other websites with information regarding new BMP technologies, regulatory updates, or training opportunities.
3.3	<b>Construction Site Inspections</b>	Conduct random inspections of 20% of active construction sites per year. If SWP3 issues are found, conduct weekly inspections until issues are resolved. Document inspections and provide information in annual report.	Construction sites will be chosen at random for inspection. Should SWP3 violations continue, the City may withhold occupancy permits or other relevant permits until issues are resolved.
3.4	<b>Public Reporting</b>	Provide link on permits webpage for public reporting construction site discharges. Provide documentation of complaints and their resolution in the annual report.	Document complaints, follow up with construction site inspection, and resolve any BMP issues noted through ordinance enforcement or withholding of permits (e.g. occupancy permits).
<b>MCM 4: Post-Construction Stormwater Management for New Development and Redevelopment</b>			
4.2	<b>List of Appropriate BMPs</b>	Develop list of appropriate BMPs and include with new development permits as well as for download from the City's permits and stormwater websites.	List will include appropriate, long-term BMPs for developments of various sizes.
4.3	<b>Inventory and Map of Structural Controls</b>	Develop and update a map using GIS or similar software and an inventory of permanent BMPs. Maintain log of inspections and maintenance to submit with annual report.	Maintain a map of all locations of structural controls and keep records of inspections and enforcement actions. Require maintenance records by permittee and maintenance plan as a requirement for development permit.
<b>MCM 5: Pollution Prevention &amp; Good Housekeeping for Municipal Operations</b>			
5.2	<b>Facilities Inventory Update</b>	Update inventory of City owned facilities and areas. Provide copy of updated inventory in annual reports.	If the City acquires new facilities, parks, etc., these areas will be added to the inventory, O&M document, and City maps.
5.3	<b>Fleet Vehicle Fueling and Washing</b>	Document stormwater pollution controls at City owned fueling facilities and washing facilities and their routine maintenance and upkeep. Provide maintenance logs with annual report.	Report will describe secondary containment measures, how and when they are cleaned, and provide SOPs for reporting and addressing discharges.
5.5	<b>Park Maintenance</b>	Provide trash receptacles in City Parks and arrange for their routine collection. Post a minimum of one (1) sign in each public park and public space regarding pet wastes and / or litter.	Signs will be posted in areas readily visible to the public. Trash receptacles will have lids or other mechanisms of containment to prevent trash from being blown out / discharged.
5.6	<b>Storm Drain Cleaning</b>	20% of storm drains or ditches will be cleaned per year. Documentation of drains or ditches cleaned, when, and by whom will be provided in the annual report.	Storm drains and ditches will be cleaned on a routine basis to reduce waste discharges to receiving waterbodies and maintain the capacity and function of the stormwater system.

**TABLE 10: STORMWATER MANAGEMENT PROGRAM SUMMARY YEAR 4**

<b>REPORTING YEAR 4</b>			
<b>BMP</b>	<b>BMP Name</b>	<b>Measurable Goal</b>	<b>Description</b>
<b>MCM 1.A: Public Education and Outreach / MCM 1.B: Public Involvement</b>			
1.2	<b>Utility Bill Inserts</b>	Maintain records of distributions including which insert version was sent, the date, and the total number of households in distribution. Include record report in attachment to annual report for the given reporting year.	Alternate inserts in utility bills with distributions annually.
1.4	<b>City Issued Permit Insert</b>	Include inserts as part of permit applications. Include record of number of each type of permit issued for the reporting year in annual report.	Inserts will be seen by business entities engaging in permitted actions within the City that have the potential to impact stormwater quality.
1.6	<b>Stormwater Webpage</b>	Refresh links to educational materials and update with stormwater related events annually. Describe updates in annual report.	Provide links to TCEQ updates, classroom educational materials, and stormwater related events for community involvement.
1.7	<b>Social Media Blasts</b>	Provide four (4) posts per year on the City's social media pages related to stormwater. Provide dates and brief description of content in annual report.	The City has social media pages viewed by the public. At least four (4) times per year, the City will post regarding stormwater pollution prevention, community involvement opportunities, or options for reporting illegal discharges.
1.8	<b>Stream Clean Up</b>	Coordinate at least one (1) stream clean-up event. Provide date, number of participants, and location in annual report.	The City partners with Keep Whitehouse Beautiful for an annual clean-up event for Blackhawk Creek. The City will seek other opportunities to facilitate community groups to host clean-up events.
1.9	<b>Incident Reporting Web Link</b>	Record the number of complaints and the City's responses, then include summary in annual report.	The City has a link on its stormwater webpage for reporting illegal dumping. In conjunction with the other BMPs for MCM 1, the City will reference this link in published materials to promote public usage.
<b>MCM 2: Illicit Discharge Detection and Elimination (IDDE)</b>			
2.1	<b>MS4 Mapping</b>	Update map to include new developments or other changes and maintain record of changes. Post link to map on City's website for public access. Submit revised map and record of changes with annual report.	A stormwater infrastructure map exists, but should be a living document updated frequently to reflect the current extent and capacity. Making the map publicly available allows the community to participate in the monitoring process.
2.2	<b>Illicit Discharge Reporting</b>	Provide phone number and link on City's website for the public to report an illicit discharge or dumping. Maintain a record of all reported incidents and provide record in annual report.	Advertise the hotline and website link on inserts described in MCM 1.A. Maintain a record of all reported incidents, the responsible party for responding to the report, actions taken, and the resolution of the issue.
2.3	<b>Dry Weather Screening</b>	Conduct visual survey quarterly during dry weather of the MS4 outfall. Provide documentation of screening results in annual report.	A visual survey will be conducted to identify non-stormwater inflows. If detected, suspicious discharges will be inspected utilizing MS4 and City maps to locate illicit dumping, direct connections, or areas where wastewater may be leaking into storm system.

2.4	<b>Education and Training</b>	Provide training once annually for field staff regarding illicit discharge detection and emergency spill response procedures. Provide documentation of attendees, dates, and subject material covered in annual report.	The standard operating procedures (SOP) for routine dry weather screening, illicit discharge reporting (IDI) investigation, and emergency spill response (ESR) will be provided to all relevant staff. Annual training covering SOPs for IDR investigation and ESR will be provided in person or online.
2.7	<b>Social Media Blasts</b>	Provide four (4) posts per year on the City's social media pages related to recycling programs, hazardous waste disposal opportunities, and penalties for illicit discharges. Provide dates and brief description of content in annual report.	The City has social media pages viewed by the public. At least four (4) times per year, the City will post regarding proper waste disposal opportunities, penalties and repercussions for illicit discharges, or options for reporting illegal discharges.
<b>MCM 3: Construction Site Stormwater Runoff Control</b>			
3.3	<b>Construction Site Inspections</b>	Conduct random inspections of 20% of active construction sites per year. If SWP3 issues are found, conduct weekly inspections until issues are resolved. Document inspections and provide information in annual report.	Construction sites will be chosen at random for inspection. Should SWP3 violations continue, the City may withhold occupancy permits or other relevant permits until issues are resolved.
3.4	<b>Public Reporting</b>	Provide link on permits webpage for public reporting construction site discharges. Provide documentation of complaints and their resolution in the annual report.	Document complaints, follow up with construction site inspection, and resolve any BMP issues noted through ordinance enforcement or withholding of permits (e.g. occupancy permits).
<b>MCM 4: Post-Construction Stormwater Management for New Development and Redevelopment</b>			
4.3	<b>Inventory and Map of Structural Controls</b>	Develop and update a map using GIS or similar software and an inventory of permanent BMPs. Maintain log of inspections and maintenance to submit with annual report.	Maintain a map of all locations of structural controls and keep records of inspections and enforcement actions. Require maintenance records by permittee and maintenance plan as a requirement for development permit.
<b>MCM 5: Pollution Prevention &amp; Good Housekeeping for Municipal Operations</b>			
5.2	<b>Facilities Inventory Update</b>	Update inventory of City owned facilities and areas. Provide copy of updated inventory in annual reports.	If the City acquires new facilities, parks, etc., these areas will be added to the inventory, O&M document, and City maps.
5.3	<b>Fleet Vehicle Fueling and Washing</b>	Document stormwater pollution controls at City owned fueling facilities and washing facilities and their routine maintenance and upkeep. Provide maintenance logs with annual report.	Report will describe secondary containment measures, how and when they are cleaned, and provide SOPs for reporting and addressing discharges.
5.6	<b>Storm Drain Cleaning</b>	20% of storm drains or ditches will be cleaned per year. Documentation of drains or ditches cleaned, when, and by whom will be provided in the annual report.	Storm drains and ditches will be cleaned on a routine basis to reduce waste discharges to receiving waterbodies and maintain the capacity and function of the stormwater system.

TABLE 11: STORMWATER MANAGEMENT PROGRAM SUMMARY YEAR 5

REPORTING YEAR 5			
BMP	BMP Name	Measurable Goal	Description
<b>MCM 1.A: Public Education and Outreach / MCM 1.B: Public Involvement</b>			
1.2	<b>Utility Bill Inserts</b>	Maintain records of distributions including which insert version was sent, the date, and the total number of households in distribution. Include record report in attachment to annual report for the given reporting year.	Alternate inserts in utility bills with distributions annually.
1.4	<b>City Issued Permit Insert</b>	Include inserts as part of permit applications. Include record of number of each type of permit issued for the reporting year in annual report.	Inserts will be seen by business entities engaging in permitted actions within the City that have the potential to impact stormwater quality.
1.6	<b>Stormwater Webpage</b>	Refresh links to educational materials and update with stormwater related events annually. Describe updates in annual report.	Provide links to TCEQ updates, classroom educational materials, and stormwater related events for community involvement.
1.7	<b>Social Media Blasts</b>	Provide four (4) posts per year on the City's social media pages related to stormwater. Provide dates and brief description of content in annual report.	The City has social media pages viewed by the public. At least four (4) times per year, the City will post regarding stormwater pollution prevention, community involvement opportunities, or options for reporting illegal discharges.
1.8	<b>Stream Clean Up</b>	Coordinate at least one (1) stream clean-up event. Provide date, number of participants, and location in annual report.	The City partners with Keep Whitehouse Beautiful for an annual clean-up event for Blackhawk Creek. The City will seek other opportunities to facilitate community groups to host clean-up events.
1.9	<b>Incident Reporting Web Link</b>	Record the number of complaints and the City's responses, then include summary in annual report.	The City has a link on its stormwater webpage for reporting illegal dumping. In conjunction with the other BMPs for MCM 1, the City will reference this link in published materials to promote public usage.
<b>MCM 2: Illicit Discharge Detection and Elimination (IDDE)</b>			
2.1	<b>MS4 Mapping</b>	Update map to include new developments or other changes and maintain record of changes. Post link to map on City's website for public access. Submit revised map and record of changes with annual report.	A stormwater infrastructure map exists, but should be a living document updated frequently to reflect the current extent and capacity. Making the map publicly available allows the community to participate in the monitoring process.
2.2	<b>Illicit Discharge Reporting</b>	Provide phone number and link on City's website for the public to report an illicit discharge or dumping. Maintain a record of all reported incidents and provide record in annual report.	Advertise the hotline and website link on inserts described in MCM 1.A. Maintain a record of all reported incidents, the responsible party for responding to the report, actions taken, and the resolution of the issue.
2.3	<b>Dry Weather Screening</b>	Conduct visual survey quarterly during dry weather of the MS4 outfall. Provide documentation of screening results in annual report.	A visual survey will be conducted to identify non-stormwater inflows. If detected, suspicious discharges will be inspected utilizing MS4 and City maps to locate illicit dumping, direct connections, or areas where wastewater may be leaking into storm system.

2.4	<b>Education and Training</b>	Provide training once annually for field staff regarding illicit discharge detection and emergency spill response procedures. Provide documentation of attendees, dates, and subject material covered in annual report.	The standard operating procedures (SOP) for routine dry weather screening, illicit discharge reporting (IDI) investigation, and emergency spill response (ESR) will be provided to all relevant staff. Annual training covering SOPs for IDR investigation and ESR will be provided in person or online.
2.7	<b>Social Media Blasts</b>	Provide four (4) posts per year on the City's social media pages related to recycling programs, hazardous waste disposal opportunities, and penalties for illicit discharges. Provide dates and brief description of content in annual report.	The City has social media pages viewed by the public. At least four (4) times per year, the City will post regarding proper waste disposal opportunities, penalties and repercussions for illicit discharges, or options for reporting illegal discharges.
<b>MCM 3: Construction Site Stormwater Runoff Control</b>			
3.3	<b>Construction Site Inspections</b>	Conduct random inspections of 20% of active construction sites per year. If SWP3 issues are found, conduct weekly inspections until issues are resolved. Document inspections and provide information in annual report.	Construction sites will be chosen at random for inspection. Should SWP3 violations continue, the City may withhold occupancy permits or other relevant permits until issues are resolved.
3.4	<b>Public Reporting</b>	Provide link on permits webpage for public reporting construction site discharges. Provide documentation of complaints and their resolution in the annual report.	Document complaints, follow up with construction site inspection, and resolve any BMP issues noted through ordinance enforcement or withholding of permits (e.g. occupancy permits).
<b>MCM 4: Post-Construction Stormwater Management for New Development and Redevelopment</b>			
4.3	<b>Inventory and Map of Structural Controls</b>	Develop and update a map using GIS or similar software and an inventory of permanent BMPs. Maintain log of inspections and maintenance to submit with annual report.	Maintain a map of all locations of structural controls and keep records of inspections and enforcement actions. Require maintenance records by permittee and maintenance plan as a requirement for development permit.
<b>MCM 5: Pollution Prevention &amp; Good Housekeeping for Municipal Operations</b>			
5.2	<b>Facilities Inventory Update</b>	Update inventory of City owned facilities and areas. Provide copy of updated inventory in annual reports.	If the City acquires new facilities, parks, etc., these areas will be added to the inventory, O&M document, and City maps.
5.3	<b>Fleet Vehicle Fueling and Washing</b>	Document stormwater pollution controls at City owned fueling facilities and washing facilities and their routine maintenance and upkeep. Provide maintenance logs with annual report.	Report will describe secondary containment measures, how and when they are cleaned, and provide SOPs for reporting and addressing discharges.
5.4	<b>Landscaping SOP</b>	Develop SOP for responsible landscaping of City owned properties. Provide link to document on City's website and distribute to City's maintenance staff.	SOP will encourage the use of native vegetation for landscaping, water conservation regarding irrigation, low impact fertilizers and pesticides, etc.
5.6	<b>Storm Drain Cleaning</b>	20% of storm drains or ditches will be cleaned per year. Documentation of drains or ditches cleaned, when, and by whom will be provided in the annual report.	Storm drains and ditches will be cleaned on a routine basis to reduce waste discharges to receiving waterbodies and maintain the capacity and function of the stormwater system.

## 9 REFERENCES

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## 10 APPENDICES

*APPENDIX A – MAPS AND EXHIBITS*

*APPENDIX B – IPAC THREATENED AND  
ENDANGERED SPECIES LIST*

*APPENDIX C – STORMWATER INSPECTION REPORT  
FORMS*

*APPENDIX D – TCEQ COMPLIANCE HISTORY*