

Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number TXR040000

A. General Information

Authorization Number: TXR040557

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

Annual Reporting Year Option Selected by MS4:

Calendar Year: _____

Permit Year: X

Fiscal Year: _____ Last day of fiscal year: (_____)

Reporting period beginning date: (month/date/year) 1/24/2021

Reporting period end date: (month/date/year) 1/23/2022

MS4 Operator Level: Level 2 Name of MS4: Tarrant County College District
Northwest Campus MS4

Contact Name: Steven Kleypas Telephone Number: 817-515-6035

Mailing Address: 5450 North Riverside Drive, Fort Worth, TX 76137

E-mail Address: steven.kleypas@tccd.edu

A copy of the annual report was submitted to the TCEQ Region: YES X NO _____
Region the annual report was submitted to: TCEQ Region 4

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		Activities outlined in the submitted SWMP have been implemented as scheduled.

Permittee is currently in compliance with recordkeeping and reporting requirements.	x	Annual reports were submitted in 2021 as required for all entities covered under the shared SWMP. Records are kept as required.
Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.).	x	Eligibility requirements of the permit are met.
Permittee conducted an annual review of its SWMP in conjunction with preparation of the annual report	x	The SWMP was updated in 2019 and a review performed in conjunction with the preparation of this annual report shows it to be up-to-date.

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 Events, Promotional and Giveaway Materials, Educational materials, Web Page, Hotline	Yes, this BMP has an indirect impact on the discharge of pollutants in stormwater. The information provided to the TCCD community is designed to increase understanding and influence behaviors. It also provides an avenue to receive feedback from the campus community on stormwater issues. Ultimately, the increased knowledge and influenced behaviors are expected to result in reduction of pollutants in stormwater.
2	Storm sewer maps, target area inspections, hotline, website reporting form, field personnel training	Yes, this BMP has a direct impact on reducing the discharge of pollutants by identifying pollutants being exposed to stormwater by field personnel or during target area inspections and/or by campus community members reporting observations of pollutants.

3	Policies, construction site reviews, inspections and investigations, hotline, and staff training	Yes, this BMP has a direct impact on reducing the discharge of pollutants by requiring construction contractors to comply with stormwater permitting and applicable BMPs, and to adhere to TCCD design standards intended to reduce pollutants exposed to stormwater. Routine inspections are intended to identify non-compliances with established BMPs, thus reducing potential pollutants from entering the stormwater.
4	Post-construction inspections and established technical design guidelines.	Yes, this BMP has a direct impact on reducing the discharge of pollutants by ensuring that the planning of new construction follows TCCD design guidelines, which incorporates stormwater pollution prevention. Post-construction inspections will assist in assuring construction has followed the guidelines.
5	Storm sewer maintenance & inspections, waste disposal, spill prevention, employee training, campus assessments, routine inspections, contractor management, water conservation, pesticide management	Yes, this BMP has a direct impact on reducing the discharge of pollutants. Facilities staff training and contractor management will assure potential pollutants are managed appropriately (i.e., materials stored indoors or under cover, spills cleaned up promptly, etc.). Campus assessment will assist in identifying additional target areas and routine inspections will identify potential pollutants and serve as additional staff training.

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**):

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
1	Public Education	Special Events	1	District-wide Virtual Event	No, a direct reduction of pollutants is not demonstrated but through education and information, a shift in behavior eventually may result in reduced pollutants.

1	Public Education	Digital Signage	5	Messages	No, a direct reduction of pollutants is not demonstrated but through education and information, a shift in behavior eventually may result in reduced pollutants.
2	Dry Weather Screening	Visual observation of outfalls and upstream areas	20	Inspections	Yes, if illicit discharges are observed they can be identified and stopped. If pollutants are observed upstream, these can be addressed prior to discharge of pollutant.
3	Construction Site Inspections	Visual observation of construction site areas	2	Inspections	Yes, if construction site BMPs are not being followed and evidence of pollutants entering stormwater is observed, this can be addressed; thus, reducing pollutant discharge.
4	Construction Plan Review	Construction design	1	Review	No, this BMP does not have a direct impact on pollutant reduction but by incorporating stormwater pollution prevention requirements into the design guidelines that contractors follow, pollutants will be reduced.
5	Storm Sewer Inspections & Maintenance	Visual observation of storm sewer systems (catch basins, inlets, drainage channels, retention ponds)	10	Inspections	Yes, by inspecting and maintaining storm sewer systems and performing required maintenance, a reduction of pollutants entering the stormwater is expected.
5	Target Area Inspections	Visual observation of target areas with potential pollutant exposure to stormwater	20	Inspections	Yes, if pollutants are observed in the target areas, these can be addressed prior to discharge of pollutant into stormwater.
5	Spill Prevention	Inspection of fuel and used oil tanks, preventative maintenance, and spill kit stocking	12	Inspections	Yes, if leaks, spills, or maintenance issues are observed in the storage tank areas, these can be addressed prior to discharge of pollutants into stormwater.

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**):

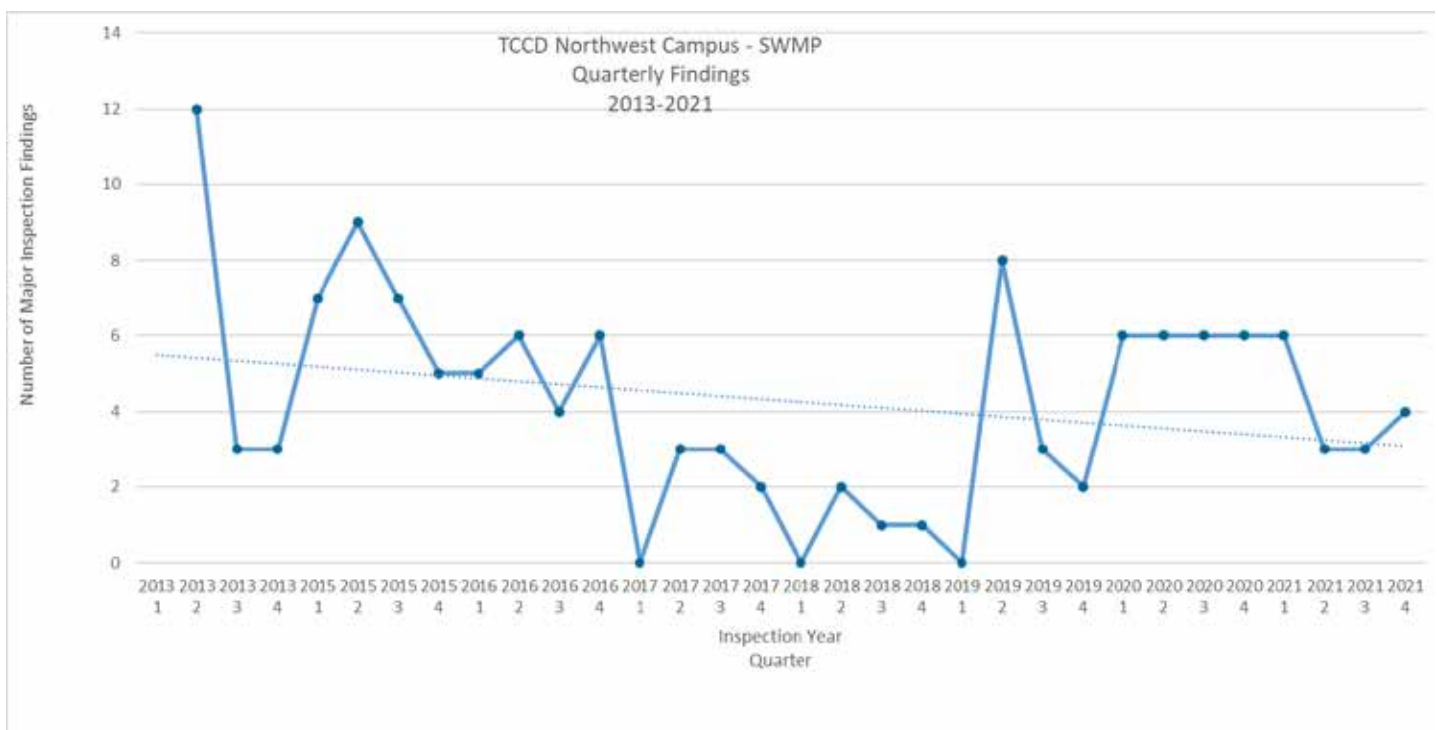
MCM(s)	Measurable Goal(s)	<p align="center">Explain progress toward goal or how goal was achieved.</p> <p align="center">If goal was not accomplished, please explain.</p>
1	Host two events at various TCCD campuses annually	There were no in-person campus events in 2021 due to the ongoing Covid-19 pandemic. However, a virtual event was held on Earth Day 2021 that the TCCD Office of Environmental Management participated in with the contribution of a video explaining stormwater pollution prevention basics and how to report environmental concerns.
1	<p>Direct participation of TCCD's Office of Environmental Management in at least 1 special event annually</p> <p>Display education materials annually at campus events.</p>	There were no in-person campus events in 2021 due to the ongoing Covid-19 pandemic. However, a virtual event was held on Earth Day 2021 that the TCCD Office of Environmental Management participated in with the contribution of a video explaining stormwater pollution prevention basics and how to report environmental concerns.
1	Establish web page	Met goal. A web site dedicated to providing information about TCCD's stormwater program was established and is currently live.
1 & 2	<p>Stormwater hotline and reporting form added to the web page.</p> <p>Review call log and summary of reports annually</p>	Met goal. The long-established stormwater hotline number is posted on the Stormwater Management web page as well as a reporting form that can be used to report concerns related to stormwater pollution. A review of the call log and reporting summary indicates no calls or reports were made in 2021. This is at least partly due to minimal in-person classes and remote working conditions.
1	Sponsor at least one cleanup day annually.	There were no in-person campus events in 2021 due to the ongoing Covid-19 pandemic.
1	Provide contractors with educational materials.	Met Goal. The primary contractor for construction project initiated at the Northwest campus in April 2019 was provided educational SWMP-related information during pre-construction meetings.
2	Review and update (if needed) storm sewer maps, annually.	Met goal. Storm sewer maps for each campus were reviewed in 2021 and no updates were needed since the 2019 SWMP revision for the new permit term.

2	<p>Conduct target area inspections at each campus quarterly.</p> <p>Review target areas annually.</p>	<p>Met goal. Target area inspections were completed at each campus, during each quarter of 2021. The target areas were reviewed in 2019, concurrent with revision of the SWMP and submittal of the new NOI for the new permit term and are reevaluated annually to ensure no additional areas needed to be included in the existing inspections.</p>
2	<p>Document and respond to 100% of IDDE reports.</p>	<p>No IDDE reports were made.</p>
3	<p>Hold pre-construction meetings for projects that disturb more than 1 acre.</p>	<p>Met Goal. Preconstruction meetings were held with the contractor for the construction project initiated in April 2019. No additional construction projects have been initiated since then.</p>
3	<p>Review 100% of applicable construction project SWP3s.</p>	<p>Met Goal. The construction project SWP3 was reviewed by the Director of Environmental Management.</p>
3	<p>Inspect 100% of applicable construction projects.</p>	<p>The construction project was inspected concurrent with the quarterly Target Area Inspections, and inspection reports were reviewed by the Director of Environmental Management.</p>
4	<p>Inspect 100% of sites following receipt of NOT.</p>	<p>No construction projects were terminated at Northwest campus during 2021, the Construction SWP3 TXR15924W is still active.</p>
5	<p>Annually review facility stormwater control inventory; inspect 100% of stormwater inlets monthly.</p>	<p>Met goal. Stormwater inlets are inspected and, if needed, cleaned out monthly. Campus maintenance, including the stormwater inlet cleanings, is tracked in the preventative maintenance software, The Maintenance Authority (TMA) Database, and reviewed semi-annually to ensure that the tasks continue to be completed. Facility stormwater control inventories are updated as needed based on observations during quarterly Target Area Inspections.</p>
5	<p>Inspect 100% of tanks at each campus, each month according to the SPCC plans.</p>	<p>Met goal. Tank inspections are conducted monthly as required by each campus's SPCC plan. Records of inspections are kept with the SPCC plans.</p>
5	<p>Install Automated Irrigation Systems at 100% (all 5) campuses.</p>	<p>Met goal. Automated Irrigation Systems have been installed at each campus to utilize active weather data to inform the irrigation system of the weather conditions and precipitation to adjust irrigation to be used as needed.</p>

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.?

Visual observations made each quarter, at each campus included the target areas and outfalls. During the quarterly inspections, the inspectors looked for flow during dry weather and assessed the condition of the outfalls (and retention ponds, if present). Also, Facilities personnel (groundskeeping staff) visually inspected the grounds, cleaning inlets as needed and looking for illicit discharges, on a weekly basis. The below graph shows the number of “findings” that were noted beginning with the initial year of SWMP implementation (2013) at the Northeast campus. **Beginning with 2nd quarter 2019, the total number of findings (including both “unacceptable” and “needs improvement”) are included in the count so that it may appear as if conditions have worsened, when in fact, the number of “unacceptable” findings has decreased so that now TCCD is focusing more on the “needs improvement” category.**



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 newly identified impaired waters were listed.

- 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.

TCCD Northwest Campus discharges to Marine Creek Lake, Segment 0806D. Review of the 2020 303(d) list, indicates this segment is impaired for bacteria, category 5c. It was first listed in 2006 as a Category 5c. In 2010, it appeared on the list as a Category 5b, and then did not appear at all on the 303(d) lists for 2012, 2014, or 2016.

TCCD Northwest Campus has determined that contribution to bacteria levels from stormwater runoff is unlikely to be significant or greater than background, naturally occurring bacteria sources. The campus does not have overflowing sewer systems, animal sources, a residential population, or other sources that would be expected to contribute to bacteria in runoff.

However, with continued offerings of educational and awareness information and the target area inspections, TCCD works to minimize or eliminate potential for litter on campus, litter or other pollutants from trash dumpsters and compactors, and in the community, which may ultimately affect bacteria levels. Implementation of these BMPs, as well as continued maintenance of structural controls, will assist in preventing further impact to stormwater by educating students, faculty, and staff.

- Describe the implementation of targeted controls if the small MS4 discharges to an impaired water body with an approved TMDL.

TCCD Northwest Campus discharges to an impaired water body (segment 0806D), but as a Category 5c, there is not an established TMDL. Category 5c indicates additional data is needed prior to developing a management strategy. However, TCCD's Director of Environmental Management will continue conducting quarterly inspections at target areas. This activity together with daily/weekly inspections of parking areas, open spaces, and outfalls are the primary activities used to address discharges. As a secondary activity, student and faculty awareness and educational programs are provided during campus events (i.e., Earth Day, Spring Fest, Arbor Day) and through display/distribution of education information and materials.

- Report the benchmark identified by the MS4 and assessment activities:

Benchmark Parameter <i>(Ex: Total Suspended Solids)</i>	Benchmark Value	Description of additional sampling or other assessment activities	Year(s) conducted
Bacteria (E Coli)	Counts (most probable number per milliliter [mpn/ml])	Quarterly visual inspections of outfalls, retention ponds, and target areas (Director of Environmental Management) Weekly/Daily inspections (Facility Services staff and groundskeepers)	2013 to present

5. Provide an analysis of how the selected BMPs will be effective in contributing to achieving the benchmark:

Benchmark Parameter	Selected BMP	Contribution to achieving Benchmark
Bacteria	Visual Observations (quarterly, weekly, daily)	Potential sources of bacteria (food waste from compactors and litter) are removed if identified.
Bacteria	Public outreach and education	Students, faculty, and staff receive bacteria-specific educational materials which may reduce both on- and off-campus discharges.

6. If applicable, report on focused BMPs to address impairment for bacteria:

Description of bacteria-focused BMP	Comments/Discussion
Target area inspections	A total of four target area inspections were completed during 2021; during each inspection, compactors, trash dumpsters, etc. were inspected among others.

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

For example, the MS4 may use the following benchmark indicators:

- number of sources identified or eliminated;
- number of illegal dumpings;
- increase in illegal dumping reported;
- number of educational opportunities conducted;
- reductions in sanitary sewer flows (SSOs); /or
- increase in illegal discharge detection through dry screening.

Benchmark Indicator	Description/Comments
Number of sources identified or eliminated.	No sources of bacteria were identified at Northwest Campus during 2021 inspections, but litter was routinely removed from parking areas and open spaces.
Number of educational opportunities conducted.	Campus events were not conducted in-person in 2021 due to the Covid-19 pandemic; however, a district-wide virtual event was conducted instead.
Illegal discharge detection through dry screening	No illegal discharge was detected during dry weather screening conducted in conjunction with quarterly inspections.

E. Stormwater Activities

Describe activities planned for the next reporting year:

MCM(s)	BMP	Stormwater Activity	Description/Comments
1	Public Events	Host at least two events such as Earth Day Celebration or Arbor Day.	Events are typically held at each campus during the spring to celebrate Earth Day or at other times of the year to provide opportunities for students and faculty to give back to the community through public service. In 2022, TCCD will be hosting a Spring Fest event at South Campus, and possibly an Earth Day event at a different campus as well. TCCD's Office of Environmental Management will participate in this event, offering information regarding its stormwater management program. If the Covid-19 pandemic allows, additional events (in person or virtual) will be planned.
1	Stormwater Educational Materials	Educational messages displayed on digital signs and/or available for viewing on the TCCD Stormwater web site.	A new educational message will be rotated onto digital signage and/or on the TCCD stormwater web page every quarter.

1 & 2	Hotline and Webpage	Stormwater information exchange	The long-established stormwater hotline will be displayed as well as a form available on the TCCD stormwater webpage. The hotline and form are intended to gather information related to pollution from the campus occupants. The Public Notice regarding the TCCD SWMP and this annual report, will be posted for information and input.
2	Storm Sewer Maps	Review and Update	The storm sewer maps will be reviewed and updated if needed.
2	Dry Weather Screen	Visual observation of outfalls during dry weather.	Outfalls will be visually inspected each quarter to determine if illicit discharges are occurring.
2, 3 & 5	Training	Initial and recurrent training	Field staff will be trained on spill response and on identifying and investigating illicit discharges. Training on BMPs and GHMs will be provided through information exchanged quarterly during target area inspections. Staff whose duties are related to implementing construction stormwater program will be trained on their responsibilities.
5	Pollution Prevention	Target Area Inspections	TCCD will continue its quarterly target area inspection program to identify potential pollutants and to continue improving performance in BMP and GHM implementation.
5	Water Conservation	Automated irrigation systems	Automated systems that utilize daily weather information will be utilized at each campus. This will allow irrigation to vary depending on temperature, wind, and rainfall.

F. SWMP Modifications

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

Yes No

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 No

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

MCM(s)	Measurable Goal(s) or BMP(s)	Implemented or Proposed Changes (Submit NOC as needed)
4	Post-Construction Site Inspections	An additional BMP was added to MCM 4. Originally, there was a BMP under this MCM to inspect 100% of sites following receipt of construction NOT, but this did not account for construction projects that disturbed fewer than 5 acres. The BMP added was to inspect 100% of sites following completion of small construction activities when the Campus Facilities Department was notified of completion. This change was required by a Notice of Deficiency from TCEQ. A response with this revision was submitted on April 9, 2021.
5	Storm Sewer Maintenance and Inspection	Goal was revised to be more measurable, stating that stormwater inlets will be inspected, and debris removed monthly and tracked in the TMA Database, and that inventories of stormwater controls will be updated annually at one campus per year. This change was required by a Notice of Deficiency from TCEQ. A response with this revision was submitted on April 9, 2021.
5	Employee Training and Information	Goal was revised to be more measurable, stating that quarterly training refreshers will be provided as a follow-up to findings of Target Area Inspections for staff at each campus, and that training will be provided by the end of permit year 5 to staff across all campuses. This change was required by a Notice of Deficiency from TCEQ. A response with this revision was submitted on April 9, 2021.
5	Waste Disposal	Goal was revised to be more measurable, indicating that a written procedure will be developed, reviewed, and revised, if needed, during annual SWMP review period to ensure 100% of wastes removed from stormwater controls is properly disposed. This change was required by a Notice of Deficiency from TCEQ. A response with this revision was submitted on April 9, 2021.
5	Spill Prevention	Goal was revised to be more measurable, stating that tanks will be inspected monthly at all 5 campuses for all 5 permit years. This change was required by a Notice of Deficiency from TCEQ. A response with this revision was submitted on April 9, 2021.
5	Inspections and Maintenance	Goal was revised to be more measurable, stating that appropriate checklists would be used to document 100% of quarterly inspections of all 5 campuses. This change was required by a Notice of Deficiency from TCEQ. A response with this revision was submitted on April 9, 2021.

5	Irrigation Conservation	Goal was revised to be more measurable, stating that automated irrigation systems would be installed at 100% (all 5) of the campuses by the end of Permit Year 5. This change was required by a Notice of Deficiency from TCEQ. A response with this revision was submitted on April 9, 2021.
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Note: If changes include additions or substitutions of BMPs, include a written analysis explaining why the original BMP is ineffective or not feasible, and why the replacement BMP is expected to achieve the goals of the original BMP.

3. Explain additional changes or proposed changes not previously mentioned (i.e. dates, contacts, procedures, annexation of land, etc.).
No additional changes.

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.

BMP	Description	Implementation Schedule (start date, etc.)	Status/Completion Date (completed, in progress, not started)
No additional BMPs necessary at this time.			

H. Additional Information

1. Is the permittee relying on another entity to satisfy any permit obligations?

Yes No

If "Yes," provide the name(s) of other entities and an explanation of their responsibilities (add more spaces or pages if needed).

Name and Explanation: In reference to illicit discharges discovered where the discharger is non-TCCD personnel, TCCD does not have a legal means by which to prohibit and/or eliminate illicit discharges and will refer these matters to the City where the campus resides (Fort Worth, Arlington, or Hurst), or the regional TCEQ office for enforcement. However, given the nature of the TCCD campuses, the possibility of a scenario where this would happen is unlikely.

- 2.a. Is the permittee part of a group sharing a SWMP with other entities?

Yes No

2.b. If "yes," is this a system-wide annual report including information for all permittees?

Yes No

If "Yes," list all associated authorization numbers, permittee names, and SWMP responsibilities of each member (add additional spaces or pages if needed):

Authorization Number: _____ Permittee: _____

Authorization Number: _____ Permittee: _____

Authorization Number: _____ Permittee: _____

Authorization Number: _____ Permittee: _____

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):

1

2a. Does the permittee utilize the optional seventh MCM related to construction?

Yes No

2b. If "yes," then provide the following information for this permit year:

The number of municipal construction activities authorized under this general permit	
The total number of acres disturbed for municipal construction projects	Not applicable.

Note: Though the seventh MCM is optional, implementation must be requested on the NOI or on a NOC and approved by the TCEQ.

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): Susan Alanis Title: Chief Operating Officer

Signature: _____ Date: March 11, 2022

Name of MS4 Tarrant County College District Northwest Campus MS4

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.