Phase II Small Municipal Separate Storm Sewer System Stormwater Management Program

Texas Pollutant Discharge Elimination System
General Permit TXR040000

Tarrant County College District
540 North Riverside Drive
Fort Worth, Texas 76137

Prepared for

Tarrant County College District
Office of Environmental Management

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1.0 Introduction

Tarrant County College District (TCCD) is actively operating under the Texas Pollutant Discharge Elimination System (TPDES) - Phase II Municipal Separate Storm Sewer Systems (MS4) General Permit (GP). This Stormwater Management Program (SWMP) was developed to satisfy regulatory requirements under the 2024 TPDES - Phase II MS4 GP issued by the Texas Commission on Environmental Quality (TCEQ) and is intended to be a part of TCCD's 2024 TPDES - Phase II MS4 GP renewal process for the five individually permitted campuses operated by TCCD. The SWMP covers TCCD's operations and facilities that have the potential to impact the quantity and quality of stormwater runoff that is eventually discharged to surface waters including streams, rivers, and lakes. This SWMP is shared by and implemented at the following TCCD campuses:

College Campus	Address	Regulated Entity Number (RN)	Permit Authorization Number
Northeast Campus	828 West Harwood Road Hurst, Texas 76054	RN105643365	TXR040556
Northwest Campus	4801 Marine Creek Parkway Fort Worth, Texas 76179	RN105550081	TXR040557
South Campus	5301 Campus Drive Fort Worth, Texas 76119	RN105643308	TXR040558
Southeast Campus	2100 Southeast Parkway Arlington, Texas 76018	RN110826724	TXR040641
Trinity River Campus	300 Trinity Campus Circle Fort Worth, Texas 76102	RN110825023	TXR040645

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Each campus has submitted their own Notice of Intent (NOI) and obtained their own GP number, which are provided above. Each campus operated by TCCD agrees to contribute to the shared responsibilities of this SWMP, and has certified as such in **Appendix A**. A copy of the TPDES MS4 GP is included as **Appendix B**, and completed NOIs are included in **Appendix C**. These records will be kept in the SWMP

binder or electronically, readily available for review, for the remainder of the permit cycle, as it exceeds three years.

A copy of this SWMP and the NOIs will be available to the public at reasonable times during regular business hours, if requested to do so in writing. Copies of the SWMP will be made available within ten working days of receipt of a written request. Other records will be provided in accordance with the Texas Public Information Act. However, requests for records from federal facilities will be addressed in accordance with the Freedom of Information Act.

1.1 Description of Drainage Areas and Receiving Waters [1] [2]

Discharges of pollutant(s) of concern to impaired water bodies for which there is an approved Total Maximum Daily Load (TMDL) must be consistent with the approved TMDL. A water body is impaired if it has been identified as such on the latest approved Clean Water Act (CWA) §303(d) list or the *Texas Integrated Report of Surface Water Quality for CWA Sections 305(b) and 303(d)*. A review of each TCCD campus has been conducted to determine the receiving water body and whether that surface water is impaired, as described below.

TCCD will check annually, in conjunction with preparation of the annual report, whether an impaired water within its permitted area has been added to the latest US Environmental Protection Agency (EPA) approved §303(d) List or the *Texas Integrated Report of Surface Water Quality for CWA Sections 305(b) and 303(d)* which lists category 4 and 5 water bodies. TCCD will comply with applicable requirements related to the impairment within two years of the impaired water being added to the list and will identify the newly listed waters in the annual report. In addition, this section of the SWMP will be revised to include the impaired water.

Stormwater from the TCCD campuses do not discharge into the Edwards Aquifer Recharge Zone, into specific watershed or water quality areas, or onto Indian Lands.

1.1.1 Northeast Campus, Hurst, Texas

TCCD Northeast Campus discharges stormwater to the Walker and Mesquite Branch of the West Fork Trinity River (TX-0841_02). This section of the River is impaired for bacteria, chlordane, polychlorinated biphenyls (PCBs), and dioxins. Because this Campus does not possess any major sources of bacteria (e.g.,

[1] 2024 Texas Integrated Report – Texas 303(d) List
[2] Texas Commission on Environmental Quality, Total Maximum Daily Load Program website https://www.tceq.texas.gov/waterquality/tmdl

livestock), utilize materials with PCBs or chlordane, or participate in production with dioxins, its activities are unlikely to contribute to the impairments. In cases where PCB or dioxin exposure is suspected, appropriate Best Management Practices (BMPs) will be applied to prevent stormwater contamination. TMDLs have been established for this segment, for *Escherichia coli (E. coli)* bacteria and chlordane. However, TCCD has determined that the Northeast Campus has little potential to cause or contribute to these impairments. There is limited unmanaged animal contribution from pets and none from livestock, and there are no overflowing sewer systems or residential populations present. In addition, there is no current or legacy use of chlordane on the Campus.

1.1.2 Northwest Campus, Fort Worth, Texas

TCCD Northwest Campus is located in the Marine Creek-West Fork Trinity River subwatershed, and primary receiving waters are Marine Creek Reservoir and Marine Creek. Marine Creek (TX-0806D_01), south of Marine Creek Reservoir, is impaired for bacteria. TCCD has determined that contribution to bacteria levels from stormwater runoff will not occur since sources such as overflowing sewer systems, animal sources, or residential populations are not present. No TMDL has been established for Marine Creek; however, Marine Creek and Marine Creek Reservoir discharge into the classified segment West Fork Trinity River Below Lake Worth (TX-0806_02). This section of the Trinity River is impaired for PCBs and dioxins. Because this Campus does not utilize materials with PCBs or participate in production with dioxins, its activities are unlikely to contribute to the impairments. In cases where PCB or dioxin exposure is suspected, appropriate BMPs will be applied to prevent stormwater contamination. A TMDL has been established for this segment for chlordane in fish tissue. However, Trinity River Campus has little potential to cause or contribute to the impairment. No other TMDLs have been established.

1.1.3 South Campus, Fort Worth, Texas

TCCD South Campus is located in the Village Creek-Lake Arlington subwatershed, with primary receiving waters being Village Creek and Lake Arlington. Village Creek (TX-0828A_01) is listed as impaired for bacteria. However, no TMDLs have been established for this water segment. TCCD has determined that contribution to bacteria levels from stormwater runoff will not occur since sources such as overflowing sewer systems, animal sources, or residential populations are not present.

1.1.4 Southeast Campus, Arlington, Texas

TCCD Southeast Campus discharges stormwater to Lynn Creek, and thence to Joe Pool Lake (TX-0838). Joe Pool Lake is not an impaired water body, and no TMDLs have been established for this water segment

1.1.5 Trinity River Campus, Fort Worth, Texas

TCCD Trinity River Campus discharges stormwater to the West Fork Trinity River Below Lake Worth (TX-0806). This section of the Trinity River is impaired for PCBs and dioxins. Because this Campus does not utilize materials with PCBs or participate in production with dioxins, its activities are unlikely to contribute to the impairments. In cases where PCB or dioxin exposure is suspected, appropriate BMPs will be applied to prevent stormwater contamination. A TMDL has been established for this segment for chlordane in fish tissue. However, Trinity River Campus has little potential to cause or contribute to the impairment. No other TMDLs have been established.

1.2 Endangered Species in Tarrant County

TCCD campuses do not contain critical habitat, and discharges are not expected to adversely affect these species or critical habitat; therefore, Campus-specific controls are not required to ensure that protection of endangered or threatened species is achieved.

1.3 Stormwater Management Program

TCCD's Division of Environmental Management developed this SWMP in accordance with the requirements of the GP to facilitate TCCD's efforts in reducing stormwater pollutants from its MS4s to the maximum extent practicable (MEP), as required.

TCCD is required to develop a SWMP that describes specific actions that will be taken over a 5-year period to reduce pollutants and protect stormwater quality to the MEP. The specific activities to be implemented are BMPs. The SWMP must also set measurable goals and maintain proper records for TCEQ's review. Various BMPs must be developed for each of the following six minimum control measures (MCMs) that are required by the Phase II Rule.

The six applicable MCMs for TCCD, a Level 2 MS4 (non-traditional small MS4 university) are:

1. Public Education and Outreach;
2. Public Involvement/Participation;
3. Illicit Discharge Detection and Elimination (IDDE);
4. Construction Site Stormwater Runoff Control;
5. Post-Construction Stormwater Management in New Development and Redevelopment; and
6. Pollution Prevention and Good Housekeeping for Operations.

In accordance with the GP, TXR040000, TCCD will annually evaluate this SWMP concurrent with preparation of the annual report. TCCD will assess the appropriateness of identified BMPs and the progress towards achieving the identified measurable goals. The information gathered and reviewed during the preparation of annual reports will assist TCCD in determining if BMPs are effective as is, or if modifications are needed.

2.0 Stormwater Management Program (SWMP)

TCCD operates as a Level 2 MS4 (non-traditional small MS4 university); as such, they are required to follow MCMs 1 through 6, as described in Part IV.D. of the GP. Additionally, they are required to address their target audience (i.e., faculty, other staff, and students) about the impacts of stormwater discharges from TCCD's campuses on water bodies and the steps that they (faculty, staff, and students) can take to reduce pollutants in stormwater runoff. Because TCCD is a Level 2 MS4, they are not required to target additional audiences. Each of the following sections contains a summary of each MCM requirement for Level 2 MS4s and TCCD's list of BMPs and measurable goals.

1.4 MCM #1: Public Education and Outreach

1.4.1 Program Overview

TCCD's stormwater education and outreach program is intended to increase public awareness and understanding of stormwater-related issues influencing surface water quality and the benefits of protecting watersheds within Tarrant County. Through this education and outreach program, the target audience will be informed and educated about the impacts that stormwater runoff can have on water quality, the hazards associated with illegal discharges, the repercussions related to improper disposal of waste, and steps they can take to reduce pollutants in stormwater.

The goals and objectives of TCCD's education and outreach program were developed based on high-priority community-wide issues such as litter and plastics impacting the Trinity River watershed, impacts of pesticide and herbicide use in the urban area, as well as the negative impacts of pet waste on water quality. TCCD has identified and analyzed its target audiences and has developed and will continue to develop or identify existing educational materials in order to maximize the content and cost effectiveness of its outreach program. TCCD's target audience and pollutants are described in the table below.

Target Audience	Target Pollutants
TCCD Students	Pet waste and illegal dumping
TCCD Faculty and Staff	Chemical products (i.e., vehicle washing)
TCCD Contractors (Construction, Maintenance, and Specialty Trades)	Oil products, sediment/ total suspended solids (TSS), and waste (hazardous and non-hazardous)

Public education and outreach records will be reviewed annually and maintained to show compliance with BMP goals for each year of the permit term. TCCD is required to select four BMPs relating to public education to comply with the GP. The four selected BMPs and associated measurable goals in achieving public education are provided in the table below.

Public Education and Outreach BMP Worksheet for Years 1-5

BMP/Activity	Target Audience	Target Pollutants	Measurable Goal
Information on the MS4 operator's website	TCCD Students, Faculty/Staff, and Contractors	Oil products, illegal dumping, and sediment from construction activities	Maintain a webpage with current, accurate information and working links. ▪ SWMP will be posted on website within 30 days after its approval date. ▪ Annual reports will be posted within 30 days after its due date. ▪ All links shall be checked, and the page shall be updated as necessary, but at a minimum of once annually. ▪ Must be maintained for the full year, each year.
Maintain or mark storm drains and inlets with, "No Dumping Drains to Creek" or a similar message	TCCD Students and Faculty/Staff	Oil products, pet waste, littering, and illegal dumping	Placard, stencil, or paint at least 10% of all known stormwater inlets in either high-impact areas identified by the small MS4 operator or impairment watersheds within the MS4 area each year. Where all known stormwater inlets have been marked, inspect, and maintain the markers for a minimum of 15% of all known stormwater inlets in either high-impact areas identified by the small the MS4 operator or impairment watersheds within the MS4 area each year.
Media/advertising campaign/public service announcements in areas of high visibility: billboard/poster; Bus shelter/bench; radio/television/movie theatre; and kiosks	TCCD Students	Oil products, pet waste, littering, and illegal dumping	Develop topics that address activities or pollutants of concern. Advertisements must: ▪ Be active at least three weeks each year; or ▪ Have an estimated public exposure for the duration of the advertising campaign that is equal to twice the population for the small MS4 area (based on the most recent U.S. Census Bureau decennial population value for the small MS4 area).
Permanent stormwater related signage	TCCD Students and Faculty/Staff	Oil products, pet waste, littering, and illegal dumping	Place signage in a location where the message is relevant and highly visible to target audience. Signage will count as annual BMP for the year it was put in place and for each subsequent year of this permit cycle, as long as each of those years the permittee inspects and maintains, as necessary, 100% of the signage once annually.

1.5 MCM #2: Public Involvement/Participation

1.5.1 Program Overview

TCCD's stormwater public involvement/participation program is intended to increase public involvement in creating a positive impact on stormwater runoff quality and surface waters within Tarrant County.

Public involvement and participation records will be reviewed annually and maintained to show compliance with BMP measurable goals for each year of the permit term. Records may include attendance sheets and event advertisements. TCCD is required to select three BMPs relating to public involvement/participation to comply with the GP. The three selected BMPs and associated measurable goals in achieving public involvement/participation are provided in the table below.

Activity/BMP	Measurable Goal
Clean-up events	Host at least two events annually in which the land area cleaned must be at least: ▪ Two acres; ▪ 400 yards of a stream, streambank, riparian area; or ▪ Two miles of roadside. You can combine these (e.g., one acre of land and 200 yards of stream).
Stormwater related speaker series	Annually, provide or support a minimum of one session. Support involves: ▪ Plan, or assist with planning, the event or activity; ▪ Contribute supplies, materials, tools, or equipment; ▪ Provide assistance from MS4 staff during the activity; ▪ Provide assistance with recruiting volunteers for events; ▪ Make a space available for projects, meetings, or events; ▪ Advertisement for the events; ▪ Supply disposal services; ▪ Arrange land or stream access; ▪ Provide financial support; or ▪ Provide donations of goods and services such as food.
Educational display/booth	Create one booth or display annually at a school, public event, or similar event that provides information or displays to improve public understanding of issues related to water quality. Staff the booth or display when the event is open to the public.

1.6 MCM #3: Illicit Discharge Detection and Elimination

1.6.1 Permit Requirements

All Permittees are required to develop, implement, and enforce a program to detect, investigate, and eliminate illicit discharges into the MS4. A program must be established to include a plan to detect and address non-stormwater discharges, including illegal dumping to the MS4.

The following non-stormwater discharges are allowable and will not be addressed in the MS4's IDDE program, unless it is considered by TCCD to be a significant source of pollutants to the MS4:

1) Water line flushing (excluding discharges of hyperchlorinated water, unless the water is first dechlorinated and discharges are not expected to adversely affect aquatic life);

2) Runoff or return flow from landscape irrigation, lawn irrigation, and other irrigation utilizing potable water, groundwater, or surface water sources;

3) Discharges from potable water sources that do not violate Texas Surface Water Quality Standards;

4) Diverted stream flows;

5) Rising ground waters and springs;

6) Uncontaminated ground water infiltration;

7) Uncontaminated pumped ground water;

8) Foundation and footing drains;

9) Air conditioning condensation;

10) Water from crawl space pumps;

11) Individual residential vehicle washing;

12) Flows from wetlands and riparian habitats;

13) Dechlorinated swimming pool discharges that do not violate Texas Surface Water Quality Standards;

14) Street wash water excluding street sweeper waste water;

15) Discharges or flows from emergency firefighting activities (firefighting activities do not include washing of trucks, run-off water from training activities, test water from fire suppression systems, and similar activities);

16) Other allowable non-stormwater discharges listed in 40 Code of Federal Regulations (CFR) § 122.26(d)(2)(iv)(B)(1);

17) Non-stormwater discharges that are specifically listed in the TPDES Multi Sector general permit (MSGP) TXR050000 or the TPDES Construction General Permit (CGP) TXR150000;

18) Discharges that are authorized by a TPDES or NPDES permit or that are not required to be permitted; and

19) Other similar occasional incidental non-stormwater discharges such as spray park water, unless the TCEQ develops permits or regulations addressing these discharges.

1.6.2 Program Overview

Implementation and oversight of the IDDE program will be performed by TCCD's Office of Environmental Management, who administers the previously established Stormwater Hotline. The Stormwater Hotline is advertised throughout each campus via digital signs, posters displayed at campus events, and on TCCD's stormwater website, to facilitate public reporting of illicit discharges. Reports of IDDE will be documented utilizing TCCD's Stormwater Hotline Response Form and are investigated within 24 hours by a member of TCCD's Office of Environmental Management using a generated maintenance work order. TCCD will continuously maintain and publicize the Stormwater Hotline reporting function on their website and determine its effectiveness by developing and implementing a tracking system to estimate what percentage of the intended audience is reached.

Stormwater Hotline response and inspections will be performed as needed to address reported concerns. Illicit discharge investigations will be performed when a suspected illicit discharge is observed during routine inspections or reported through the Stormwater Hotline or other measure. Investigations of potential illicit discharges are completed in accordance with the IDDE Field Investigation Guide[3] (**Appendix D**) and documented utilizing the IDDE Inspection Worksheet (**Appendix E**). Response

[3] Available from the North Central Texas Council of Governments (NCTCOG)

procedures will be reviewed and/or updated at least annually to address changes or improvements, where necessary.

TCCD will work to encourage compliance with City ordinances pertaining to watershed protection to prohibit illicit discharges (unallowable, non-stormwater discharges) to permitted storm sewer systems. Illicit discharges resulting from TCCD staff or college faculty are strictly prohibited and TCCD will initiate disciplinary action against responsible parties as appropriate, in accordance with the administrative policies of TCCD. For 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.

BMPs anticipated to be used to address this MCM and their measurable goals are presented in the table below.

BMP Measurable Goals and Recordkeeping
Illicit Discharge Detection and Elimination

BMP	Measurable Goals
Maintain a current and accurate MS4 map	TCCD maintains MS4 maps on the Campuses (**Figures 1-5**), which also are readily available for the TCEQ's review. The MS4 maps show the locations of MS4 outfalls that are operated by TCCD and that discharge into Waters of the U.S. at each Campus and the location and name of the surface waters receiving discharges from TCCD's MS4 outfalls. Maps will be reviewed annually during annual report period, and updated, as necessary, to include features which have been added, removed, or changed for each campus.
Conduct training for all the permittee's field staff	Conduct a minimum of one training annually for 100% of TCCD staff that may come into contact with or otherwise observe an illicit discharge, illegal dumping, or illicit connection to the MS4 as part of their normal job responsibilities. Utilizing the IDDE Field Investigation Guide (**Appendix D**) as a training tool, train TCCD field personnel on identifying and investigating illicit discharges, either in person or using self-paced training materials such as videos or reading materials. Attendance will be maintained using an electronic training log of individuals name, job title, and signature, along with training materials. The log will be maintained at the Campus and readily available for TCEQ's review.
Stormwater Hotline and Reporting Form	Administer hotline and online reporting form for reporting of polluters or dry weather flow by the community, applicable to all campuses. Publicize the public reporting mechanism a minimum of two times annually in a method designed to reach the majority of the intended audience. Develop and implement a tracking system to estimate what percentage of the intended audience is reached for determining BMP effectiveness. Maintain the public reporting mechanism on the public website 100% of the time during the permit term.
Develop and maintain procedures for responding to illicit discharges, illegal dumping, and spills	Review and update the procedures at least one time annually to address changes and make improvements to the established procedures where applicable.

BMP	Measurable Goals
Source investigation and elimination of illicit discharges and illegal dumping	Respond to 100% of known illicit discharges and illegal dumping incidents each year to investigate sources. Respond to 100% of high priority discharges each year, such as sanitary sewer discharges within 24 hours. A maintenance work order will be utilized to document response. For 100% of known illicit discharges or illegal dumping incidents where the small MS4 does not have jurisdiction, notify the adjacent MS4 operator or the applicable TCEQ regional office each year. Notify TCEQ immediately of 100% of illicit flows believed to be an immediate threat to human health or the environment throughout the permit term.
Corrective action to eliminate illicit discharges and illegal dumping	For 100% of illicit discharges or illegal dumping where a source has been determined, notify the responsible party of the problem within 24 hours. Require the responsible party to perform all necessary corrective actions to eliminate the illicit discharge.
Inspection procedures	Conduct and document quarterly inspections using target area checklists and track corrective actions to completion. Target areas will be reviewed annually, and target area maps/checklists will be revised (if needed). Review and update the procedures at least one time annually to address changes and make improvements to the established procedures where applicable.
Inspections in response to complaints	Conduct inspections in response to 100% of complaints each year according to the established procedures. Conduct follow up inspections in 100% of cases each year where necessary as described in the established procedures. Inspections and follow-ups will be documented using the IDDE Inspection Worksheet (**Appendix E**).

BMP	Measurable Goals
On-Site Sewage Disposal Systems	Identify On-Site Sewage Facilities (OSSFs) and keep track of their status each year. Develop procedures to address failing and poorly maintained systems. Investigate and address 100% of OSSF complaints reported through the TCCD's Stormwater Hotline. Prevent and correct leaking on-site sewage disposal systems (acid neutralization pits that receive discharges from instructional labs and grease traps that receive discharges from kitchens). Notify the district's Facilities Department upon discovery of any system issues and enact work orders promptly to address any necessary repairs. Review and update the inventory of identified OSSFs and their status at least once annually to address changes or additions. Currently there are no OSSFs on Campus.

1.7 MCM #4: Construction Site Stormwater Runoff Control

1.7.1 Permit Requirements

The MS4 operator, to the extent allowable under state and local law, must develop, implement, and enforce a program requiring operators of construction activities to select, install, implement, and maintain stormwater control measures that prevent illicit discharges to the MEP. The MS4 operator must review and update procedures at least once annually to address changes and make improvements.

1.7.2 Program Overview

TCCD requires construction site operators to implement appropriate erosion and sediment control BMPs for construction activities discharging stormwater into the MS4 in accordance with the TPDES construction General Permit (CGP), TXR150000 and local ordinances. This practice is implemented through contract language between TCCD and the contractor. TCCD does not allow contractors to conduct the following discharges:

- Wastewater from the washout of concrete and wastewater from water well drilling operations, unless managed by an appropriate control.
- Wastewater from the washout and cleanout of stucco and paint from releases of oils and other construction materials.
- Fuels, oils, and other pollutants used in vehicle and equipment operation and maintenance.
- Soaps and solvents used in vehicle and equipment washing.
- Discharges from dewatering activities, including discharges from dewatering trenches and excavations, unless managed by appropriate BMPs.

TCCD implements site plan review procedures, which include review of potential water quality impacts and site-specific construction site control measures that meet the requirements of the TPDES CGP. If required by state regulations, each construction site will develop and implement a Construction Stormwater Pollution Prevention Plan (CSWP3) that includes adequate sediment and erosion controls. Discharging of wash out wastewater, fuels, oils, soaps, solvents, and dewatering activities is strictly prohibited. Waste from construction sites is the responsibility of the contractor performing the work. Contractors are responsible for addressing construction waste based on the appropriate federal, state, and local laws. TCCD crews will be responsible for managing construction waste from TCCD-led projects.

Implementation and oversight of the construction site stormwater runoff control program will be performed by TCCD's Office of Environmental Management to assure proper selection, installation, implementation, and maintenance of stormwater control measures, as well as assuring that prohibited discharges are not occurring.

TCCD-owned construction sites will comply with TCEQ Construction General Permit No. TXR150000. which includes (1) maintaining BMPs for sediment and erosion control; (2) implementing procedures for initiating and completing soil stabilization measures; (3) minimizing exposure of building materials, building products, construction waste, trash, landscape materials, fertilizers, pesticides, herbicides, detergents, sanitary waste, and other materials to stormwater; and (4) maintaining BMPs to minimize discharge of pollutants from spills and leaks.

TCCD will review construction site plans during pre-construction meetings and will request copies of the SWP3s. Informational materials will be provided to contractors regarding stormwater pollution and applicable BMPs during the contacting phase and/or during pre-construction meetings. During or immediately following the pre-construction meeting, TCCD will also assess permit requirements, confirm permits are in effect, and review proposed Best Management Practices for erosion/sediment control, oil and chemical use and storage, and other measures as appropriate.

Site inspections, which may be prompted through public complaints or visible violations observed by TCCD's Office of Environmental Management, will be conducted at construction sites during the active construction phase, in accordance with the TCEQ Construction General Permit, as well as the Construction Site Inspection Report Worksheet (**Appendix F**). TCCD will take the following steps when conducting site inspections.

- Before an inspection occurs, TCCD's Office of Environmental Management will coordinate with the operators of the site to determine if it is safe to enter and verify construction plans have been received and reviewed.

- Following a construction site inspection, inspector(s) must provide a written or electronic inspection report to the site operator(s).

- Conduct follow-ups as needed, based on inspection findings.

- Track follow-up inspections and enforcement actions. Records must be maintained for review by TCEQ when requested.

TCCD employees found to be in violation will be subject to TCCD's administrative policy regarding disciplinary actions for employees. Construction site contractors failing to comply with the provisions of the established SWP3 for construction sites will be issued a warning from TCCD inspector and if corrective action is not achieved, may be reported to the TCEQ for violations.

BMPs and measurable goals to be used to address this MCM are presented in the following table.

BMP Measurable Goals and Recordkeeping
Construction Site Stormwater Runoff Control

BMP	Measurable Goals
Develop and maintain an ordinance or other regulatory mechanism	Contractors are expected to follow the CGP and local ordinances.
Prohibit discharges	Develop and maintain an ordinance or other regulatory mechanism to prohibit these discharges. TCCD prohibits discharges listed in the CGP and local ordinances through contracts between TCCD and the hired contractor.
Maintain and implement site plan review procedures that describe which plans will be reviewed as well as when an operator may begin construction	Implement site plan review procedures for 100% of new construction site plans received each year. Inspections of construction sites operated by TCCD or contractors that are located in TCCD's regulated area will be conducted. Review and update site plan review procedures at least one time annually to address changes and make improvements to the established procedures where applicable.
Implement procedures for inspecting large and small construction projects	Site inspections will be conducted at construction sites in accordance with the CGP, as well as the Construction Site Inspection Report Worksheet (**Appendix F**). Follow-ups will be conducted, as needed, based on inspection findings. Review and update inspection procedures at least one time annually to address changes and make improvements to the established procedures where applicable.
Conduct construction site inspections	Conduct inspections at a minimum of 80% of active construction sites annually according to the established procedures. Following a construction site inspection, inspector(s) must provide a written or electronic inspection report to the site operator(s). Each year, conduct follow up inspections in 100% of cases where necessary as described in the established procedures. Follow-up inspections and enforcement actions must be tracked, and records must be maintained for review by TCEQ when requested.

BMP	Measurable Goals
Develop, implement, and maintain procedures for receipt and consideration of information submitted by the public	Review and update procedures for the receipt and consideration of information submitted by the public at least one time annually to address changes and make improvements to the established procedures where applicable. The established Stormwater Hotline on TCCD's website may be used as a conduit for receiving information submitted by the public regarding construction stormwater concerns. Review and update procedures at least once annually to address changes and make improvements to the procedures if necessary.
Conduct training for all the MS4 staff whose primary job duties are related to implementing the construction stormwater program	Conduct a minimum of one training annually for 100% of TCCD's staff whose primary job duties are related to implementing the construction stormwater program (including permitting, plan review, construction site inspections, and enforcement). Training may be conducted in person or using self-paced training materials such as videos or reading materials. Maintain a log to document training activities and trainees, including: training date, topics covered, type of training (in person, training video, etc.), and attendees name, job title, and signature. Records of attendance will be kept electronically for review by TCEQ when requested.

1.8 MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment

1.8.1 Permit Requirements

TCCD is required to develop, implement, and enforce a program, to the extent allowable under state, federal, and local law, to control stormwater discharges from new development and redeveloped sites that discharge into the small MS4 that disturb one acre or more. This includes smaller development or redevelopment projects which are part of a larger common plan of development that would disturb one acre or more.

1.8.2 Program Overview

TCCD's Real Estate & Facilities group maintains detailed technical design guidelines that are required to be followed for all planning, design, and construction of new facilities, additions, expansions, or renovations of existing facilities. The design guidelines include encouragement to divert stormwater to bio-retention areas, rain gardens or swales and to preserve natural inclination of existing features as much as possible (i.e., creek beds, outcrops). Detailed landscaping requirements are also included, which encourages the use of native and adapted plantings.

Selected control measures will be reviewed during pre-construction meetings and will be inspected post-construction. Long-term maintenance of structural controls will be reviewed by TCCD's Office of Environmental Management using work orders added to the appropriate preventive maintenance schedule within TCCD's The Maintenance Authority (TMA) preventative maintenance (PM) program. Responsible parties will be determined for maintenance purposes, but actions will likely include TCCD maintenance and facilities staff.

TCCD will enforce a post-construction site runoff policy to address new development and redevelopment projects that disturb greater than or equal to 1 acre or are part of a common plan of development that is greater than or equal to 1 acre. Enforcement will be accomplished via contractual obligations. In addition, new projects must also meet applicable local city ordinances.

BMPs anticipated to be used to address this MCM are presented in the table below. Included in each BMP is a description of records that will be maintained and provided in the annual reports, the responsible party, and an implementation schedule.

BMP Measurable Goals and Recordkeeping

Post-Construction Stormwater Management in New Development and Redevelopment

BMP	Measurable Goals
Post-Construction Stormwater Management Program	Inspect 100% of construction site activities after Notice of Termination (NOT) submittal or completion of small construction activities using work orders created in PM program.
Develop and maintain an ordinance or other regulatory mechanism	Address post-construction runoff from new development and redevelopment projects through CGP permits for large and small construction activities. Failure to comply with the provisions of the CGP for post-construction sites will result in an issued warning from a TCCD inspector, and if corrective action is not achieved, may be reported to the TCEQ for violations. Corrective measures will be implemented for 100% of sites found to be out of compliance with local city ordinances during Post-Construction Inspections.
Document and maintain records of enforcement actions and make them available for review by the TCEQ	Document and maintain records for 100% of enforcement actions taken in response to illicit discharges or post-construction maintenance needs at the five campuses and keep records for 3 years beyond the end of the current permit cycle. Make the records available to TCEQ for review within 24 hours of a request.
Ensure the long-term operation and maintenance of structural stormwater control measures installed	Maintenance will be performed by either TCCD or the operator of a new development or redeveloped site under a maintenance plan. A plan must be developed and implemented to address maintenance requirements for structural control measures installed on-site. Note: if maintenance is to be completed by the operator of a new development or redeveloped site under a maintenance plan, then the maintenance plan must be filed in the real property records of the county in which the property is located. Maintenance activities will be documented and retained on-site (e.g., the offices of the site owner or operator) and made available for review by the operator or TCEQ within 24 hours of a request.

1.9 MCM#6: Pollution Prevention and Good Housekeeping for Operations

1.9.1 Permit Requirements

TCCD is required to develop and implement an operation and maintenance (O&M) program that includes an employee training component and has the ultimate goal of preventing or reducing pollutant runoff. O&M activities include but are not limited to storm sewer system maintenance, building maintenance, road maintenance, and chemical applications.

TCCD must develop and maintain an inventory of facilities and stormwater controls that it owns and operates. The inventory must include applicable permit numbers, registration numbers, and authorization for each facility or control. The inventory is to be available to the TCEQ upon request and must include, but is not limited to the following types of facilities:

- Composting facilities;
- Equipment storage and maintenance facilities;
- Fuel storage facilities;
- Hazardous waste disposal facilities;
- Hazardous waste handling and transfer facilities;
- Incinerators;
- Landfills;
- Materials storage yards;
- Pesticide storage facilities;
- Buildings, including schools, libraries, police stations, fire stations, and office buildings;
- Parking lots;
- Golf courses;
- Swimming pools;
- Public works yards;
- Recycling facilities;
- Solid waste handling and transfer facilities;
- Street repair and maintenance sites;
- Vehicle storage and maintenance yards; and
- Structural stormwater controls.

1.9.2 Program Overview

TCCD has evaluated O&M activities for their potential to discharge pollutants in stormwater. TCCD has developed and implemented Stormwater Pollution Prevention Plans (SWP3s) for its operations and target areas at each campus. The SWP3s document pollutants of concern from O&M activities, other

pollutant-generating activities, and implemented pollution prevention measures. Target area maps have been developed and Quarterly Target Area Inspection Checklists are reviewed annually and revised to include new pollution prevention measures and structural controls, as appropriate. A log of inspections is maintained to document progress and summarize findings.

Good housekeeping measures and non-structural BMPs have been developed to reduce the discharge of pollutants. TCCD operations subject to the operation, maintenance, or training program developed under the good-housekeeping and pollution prevention MCM include:

- Park and open space maintenance
- Street, road or highway maintenance
- Fleet and building maintenance
- Storm sewer system maintenance
- New construction and land disturbances
- Municipal parking lots
- Vehicle and equipment maintenance and storage yards
- Waste transfer stations
- Cold Weather Operations (including salt / sand storage locations)

TCCD employees responsible for O&M activities will continue to be trained on programs that focus on procedures for reducing the discharge or pollutants. Target area quarterly inspections and corrective action follow up activities are the primary mechanism for ongoing staff training and education.

TCCD will review existing and/or develop inspection and maintenance procedures for structural control measures to ensure adequate long-term maintenance. This annual review will include developing and updating an inventory of stormwater controls and the associated maintenance required. TCCD will utilize the existing TMA PM tracking software to schedule and track inspection and maintenance of structural controls.

TCCD will review existing and/or develop waste management procedures to facilitate adequate proper handling and disposal of wastes generated during O&M activities. Waste management procedures will address, at a minimum, dredge spoils, accumulated sediment, and floatables removed from the MS4. Additionally, waste material will be managed in accordance with TCCD's existing Hazardous Material Management Program, and solid waste and non-hazardous waste will be handled in accordance with TCEQ regulations in 30 Texas Administrative Code (TAC) 335.

Contractors hired by TCCD to perform maintenance activities on TCCD-owned facilities will be contractually required to comply with all of the stormwater control measures, good housekeeping practices, and facility specific stormwater management operating procedures implemented by TCCD. TCCD will provide adequate oversight of contractor activities to ensure they are using appropriate control measures and standard operating procedures.

BMPs anticipated to be used to address this MCM are presented in the table below.

BMP	Measurable Goals
Permittee-owned facilities and control inventory	Develop and maintain an annual inventory for 100% of the small MS4 owned and operated facilities and controls in the small MS4 area. Review and update the inventory at least one time annually to address changes or additions to the facilities and controls where applicable.
Training and education	Conduct a minimum of one training annually for 100% of employees involved in implementing pollution prevention and good housekeeping practices. Maintain Training attendance list for review by TCEQ upon request. For small MS4s which use only contractors to implement pollution prevention and good housekeeping practices, ensure training of 100% of applicable contract staff is conducted at least one time annually using contract language or another similar method.
Disposal of waste material	Ensure that 100% of waste from the MS4 is disposed of in accordance with 30 TAC Chapters 330 or 335, as applicable each year.
Contractor requirements and oversight	Each year, ensure that 100% of contractors (i.e., janitorial, cafeteria) hired by the MS4 to perform maintenance activities on permittee-owned facilities is contractually required to comply with all of the stormwater control measures, good housekeeping practices, and facility-specific stormwater management operating procedures described in Parts IV D.6.(b)(2)-(6). Contracts will be in place for 100% of contractors hired by TCCD, and contractor activities are overseen by the Office of Environmental Management. Implement oversight procedures of contractor activities in 100% of contracts to ensure that contractors are using appropriate control measures and Standard Operating Procedures (SOPs) each year. Oversight procedures must be maintained on-site 100% of the time and made available for review by TCEQ within 24 hours of request.

BMP	Measurable Goals
Assessment of permittee-owned operations	Evaluate 100% of O&M activities, in conjunction with procedure reviews if appropriate, for their potential to discharge pollutants in stormwater annually including but not limited to: ▪ Road and parking lot maintenance, including such areas as pothole repair, pavement marking, sealing, and re-paving; ▪ Bridge maintenance, including such areas as re-chipping, grinding, and saw cutting; ▪ Cold weather operations, including plowing, sanding, and application of deicing and anti-icing compounds and maintenance of snow disposal areas; and ▪ Right-of-way maintenance, including mowing, herbicide and pesticide application, and planting vegetation. 100% of personnel applying pesticides are licensed and follow the proper application procedures. Native and adapted plants are also used to minimize need for pesticides.
Identify pollutants of concern	Identify pollutants of concern that could be discharged from all of the O&M activities described in Part IV.D.6.(b)(5)b and maintain a list of 100% of the pollutants identified. Including for example, metals; chlorides; hydrocarbons such as benzene, toluene, ethylbenzene, and xylenes; sediment; and trash. Review and update the pollutants of concern list at least one time annually to address changes or additions to the O&M activities where applicable.
Pollution prevention measures	Develop and implement a set of pollution prevention measures that will reduce the discharge of pollutants in stormwater from the permittee-owned operations. Implement at least two of the following pollution prevention measures: ▪ Replace at least 50% of the MS4's materials and chemicals with more environmentally friendly materials or methods by the end of the permit term; ▪ Track 100% of the application of deicing and anti-icing compounds in the MS4 area and record the amount of compound used for each application annually; ▪ Use suspended tarps, booms, or vacuums to capture paint, solvents, rust, paint chips and other pollutants during 80% of regular bridge maintenance each year; and ▪ Place barriers around or conduct runoff away from 100% of deicing chemical storage areas to prevent discharge into surface waters each year.

BMP	Measurable Goals
Inspection of pollution prevention measures	At least one time annually, visually inspect 100% of pollution prevention measures implemented at permittee-owned facilities to ensure they are working properly. Develop and maintain written procedures that describe the frequency of inspections and how they will be conducted. Review and update the inspection procedures at least one time annually to address changes or additions to the pollution prevention measures. Maintain a log of 100% of the inspections conducted annually and make the log available for review by the TCEQ within 24 hours of a request.
Structural control maintenance	At least one time annually, perform maintenance of 100% of the structural controls which require maintenance. Maintenance must follow a plan and schedule developed by the small MS4 operator to be consistent with maintaining the effectiveness of the BMP. The permittee shall develop and maintain written procedures that define the frequency of inspections and how they will be conducted. Review and update the maintenance procedures at least one time annually to address changes or additions to the pollution prevention measures.

2.7 Total Maximum Daily Load (TMDL) Compliance

The TCEQ has adopted an implementation plan (I-Plan) TMDL for bacteria and chlordane in edible tissues for the Greater Trinity River Region, including Segment No. 0841 that receives discharges from the Northeast Campus. TCCD is a regulated MS4 within the affected region and therefore must meet the TMDL requirements of the I-Plan.

Background

Potential sources identified at the Northeast Campus include limited unmanaged animal contribution from pet waste and naturally occurring wildlife, grease traps, illegal dumping, and food waste litter. There are no OSSFs or residential populations present.

The TCCD Northeast Campus discharges specifically into the Creek segment 0841_02, and Table 71 of the I-Plan indicates the Waste Load Allocation value (WLA_{SW}) is 1,920 billion mpn/day.

The current and proposed ways in which TCCD plans to address the bacteria load in its MS4, aligning with the program efforts set forth in the I-Plan, are discussed below.

2.7.1 IDDE Program Participation

As discussed in MCM #2: IDDE, TCCD has established BMPs for inspecting campuses, activating public support, and training field personnel in reporting observations of illicit, non-stormwater discharges. This would include any potential wastewater, untreated sewage, or illegal dumping which could negatively impact bacteria loading.

Additionally, MCM #2 includes a BMP to prevent and correct leaking on-site sewage disposal systems. For TCCD, these sewage disposal systems include acid neutralization pits that receive discharges from instructional labs and grease traps that receive discharges from kitchens. There is no electronic or mechanical detection system to discover leaks or ruptures in these on-site sewage disposal systems, so the disposal systems are free flowing to the City of Fort Worth. However, the district's Facilities Department is notified upon discovery of any system issues and work orders are enacted promptly to address any necessary repairs.

2.7.2 Additional Means of Addressing Bacteria Sources

As discussed in MCM #1: Public Education and Outreach, TCCD has established BMPs regarding public education of impacts of pet waste and food waste litter on stormwater quality, and ways to manage pet wastes via pet waste collection stations. At a minimum, pet waste stations will be installed at the Northeast Campus. Public Education efforts are specifically geared towards

increasing the public awareness of impacts to stormwater from pet waste and food waste litter, with ideas for how the public can participate in mitigating these issues. BMPs for addressing bacteria sources are described in the table below.

BMP	Measurable Goals
From MCM #2: Target Area Inspections	Document quarterly inspections a using target area checklists and track corrective actions to completion. These areas include trash compactors or areas where waste accumulation occurs.
From MCM #2: Stormwater Hotline and Reporting Form	Document and respond to 100% of reports; document each IDDE investigation until corrective action is complete.
From MCM #2: Field Personnel Training	Initial training will be provided to each new field staff member. Training will be conducted annually at alternating campuses, using the IDDE Field Investigation Guide as a training tool. In lieu of annual campus-specific training, TCCD may offer a combined training for staff from all campuses every other year. Training will include identifying and investigating illicit discharges and emphasize discharges that may be sources of bacteria.
From MCM#1: Educational displays, pamphlets, booklets addressing pet waste and litter	Display educational materials annually at campus events. Install pet waste stations at campuses and/or sponsor stations at local parks. At least one station per campus will be installed, one per year for a total of five stations. In lieu of a station installed at a campus, TCCD may choose to sponsor installation of a station at a local park where pet waste is of more concern.
From MCM#1: Permanent stormwater related signage	Place signage in a location where the message is relevant and highly visible to target audience. Signage will count as annual BMP for the year it was put in place and for each subsequent year of this permit cycle, as long as each of those years the permittee inspects and maintains, as necessary, 100% of the signage once annually.

Figures

Appendix A

Coalition Shared SWMP

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Appendix B

TPDES MS4 General Permit

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Appendix C

Notices of Intent

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Appendix D

IDDE Field Investigation Guide

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Appendix E

IDDE Inspection Worksheet

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Appendix F

Construction Site Inspection Report Worksheet

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