Stormwater Management Program
For the City of Victoria

Table of Contents

Part 1: Stormwater Management Plan (SWMP) Overview

Regulatory Requirement

Phase I of the U.S. Environmental Protection Agency's (EPA) municipal stormwater program was promulgated in 1990 under the authority of the Clean Water Act (CWA). Phase I relied on the National Pollutant Discharge Elimination System (NPDES) permit coverage to address stormwater runoff from medium and large municipal separate storm sewer systems (MS4s), serving populations of 100,000 or greater.

The Stormwater Phase II Final Rule (promulgated December 8, 1999) was the next step in the EPA's efforts to preserve, protect, and improve the nation's water resources from polluted stormwater runoff. The Phase II program requires additional operators (small MS4s in urbanized areas) to implement programs and practices to control polluted stormwater runoff, through the NPDES permit program. The program requires Phase II municipalities to develop a Stormwater Management Program (SWMP).

As mandated above, the City of Victoria developed a SWMP that was approved by City Council on January 15, 2008, and then updated to reflect language changes on April 21, 2009. The City completed the original five-year implementation phase on August 12, 2012. At that time, the TCEQ had intended to issue a new Texas Pollutant Discharge Elimination System (TPDES) General Permit, but it was delayed while the TCEQ and the EPA worked out the final details of the permit. During that time, all current TPDES permit holders were instructed to operate under the old General Permit until a new one could be issued. On December 13, 2013, and January 24, 2019, the TCEQ issued the new General Permit which requires Phase II municipalities to update and revise their SWMPs to meet new requirements. The City of Victoria is considered a Level 3 Regulated Small MS4 (serves a population of at least 40,000 but less than 100,000).

On January 24, 2024, the General Permit expired, and a new one was issued on August 15, 2024. As required, the City updated its existing SWMP to meet the requirements of the 2024 general permit. This updated SWMP replaces and supersedes any and all previous SWMPs developed for the City of Victoria and is subject to the following requirements.

Description of Minimum Control Measures

To meet the new State and Federal regulations, a Stormwater Management Program must meet the requirements of the six Minimum Control Measure (MCMs) described below.

1. Public Education and Outreach

   Public education and outreach are key to the success of a stormwater management program. Through public education, people will gain an understanding of how their actions can affect stormwater quality and become more informed about stormwater quality issues in their community. MS4s will start to gain more support for their management programs both politically and financially as public awareness grows. Public education is also able to perpetuate itself. As an individual becomes more informed about a topic of concern, they will inform others in their community. This aids the municipalities' efforts to educate the public, thus making resources available for other tasks. Also, when the public is aware of the impacts that they have on their surroundings, they gain a sense of responsibility for those actions. This can lead to greater compliance for the stormwater management program. When the public makes an effort to comply with the management program, the program will have a greater positive effect more quickly. Many public education methods are available. Some examples of methods that will be considered are:

   - Distributing brochures or fact sheets.
   - Distributing information via social media.
   - Sponsoring speaking engagements before community groups.
   - Providing public service announcements.
   - Implementing educational programs targeted at school age children.
   - Conducting community-based projects such as storm drain stenciling, and watershed and beach cleanups.

   MS4s are also able to utilize stormwater education information available through the state, tribe, EPA, or other organizations in their education program. The public education program should target several different areas. First, individuals and households should be educated on how to maintain their homes in an environmentally friendly manner. This includes proper fertilizer, herbicide, and pesticide use; proper waste disposal; and proper septic system maintenance. The program should also inform the public on how to get involved in restoration activities and other conservation groups. Finally, the program should target commercial, industrial, and institutional groups, which may

have business activities that could cause a significant impact to the stormwater quality of the MS4. The SWMP objectives should be:

- Inform individuals and homeowners of steps they can take to improve stormwater quality.
- Educate commercial, industrial, and institutional groups about the impacts of their work on the stormwater quality and the steps needed to reduce these effects.
- Address the viewpoints of all economic and ethnic groups in the design of the education program.

2. Public Involvement/Participation

Public involvement/participation is important for the development of the stormwater management program. By encouraging input from all economic and cultural groups, there can be beneficial impacts to the development of the program. One such benefit is that early and frequent public input can lead to a shorter implementation schedule and greater support for the program. As with public education, people who take an active role in the development of the program also feel a sense of responsibility for the program's success. For this reason, people may be less likely to challenge the MS4's program, which can lead to delays and hinder the program's success. Finally, with a larger number of people involved in the development of the program, there are more opportunities to gain expertise from these individuals and cooperation with other programs or governments in that watershed. These added resources can improve the success of the program.

Members of the community can get involved in several ways. Possibilities for participation include serving as citizen representatives on a local stormwater management panel, attending public hearings, working as citizen volunteers to educate other individuals about the program, assisting in program coordination with other pre-existing programs, or participating in volunteer monitoring efforts. SWMP objectives are:

- Include the public in the development, implementation, and review of the stormwater management program.
- Include input from all economic and cultural groups.

3. Illicit Discharge Detection and Elimination

The illicit discharge detection and elimination (IDDE) minimum control measure is intended to reduce improper waste and management practices. A study by the Nationwide Urban Runoff Program (NURP) found that a little less than half of the water that is discharged from a MS4 during dry weather conditions was not directly related to stormwater runoff. These dry weather discharges were found to have pollutant levels high enough to significantly impact the water quality of the receiving water bodies. It is believed that most of the flow during dry weather conditions is due to illicit and/or inappropriate discharges and connections to the MS4 such as mistaken or deliberate connections of wastewater lines to the MS4. The MS4 may also receive the illicit discharge through an indirect connection such as infiltration into the MS4 or spills flowing into storm drains.

There are four parts to this minimum control measure. The first part is to develop an MS4 map that identifies all outfalls and the name and location of all waters of the United States that receive the discharge from the outfalls. The second part of the illicit discharge and elimination control measure is to prohibit the discharge of non-stormwater discharges to the MS4 through regulatory avenues and to develop a means to enforce these regulations. The third part is to execute a plan to detect and address non-stormwater discharges. Dry weather screening is one method for localizing illicit discharges in MS4s. Finally, the public should be educated about the hazards of improper waste disposal and non-stormwater discharges. The educational component may include storm drain stenciling, a program to promote, publicize, and facilitate public reporting of illicit connections or discharges, and distribution of outreach materials. At a minimum, objectives are:

- Develop procedures to locate areas suspected of having illicit discharges.
- Develop procedures to track down the source of an illicit discharge.
- Develop procedures to remove the illicit discharge.
- Develop procedures to evaluate the programs performance.

4. Construction Site Stormwater Runoff Control

Construction site stormwater runoff control is a minimum control measure designed to address the pollution of stormwater runoff from construction sites. Activities that are performed on construction sites usually disturb a large

amount of land and generate large amounts of waste. This has been found to lead to high levels of sediment, phosphorus, nitrogen, pesticides, petroleum derivatives, construction chemicals, and solid wastes in receiving streams.

Several actions must be taken under this minimum control measure to deal with these pollutants. First, construction sites must be required through regulations or ordinances, to establish erosion and sediment controls. A mechanism to enforce compliance must also be established with the regulation or ordinance to ensure that the necessary controls are implemented. This may include non-monetary penalties, fines, bonding requirements, and permit denials. Next, the MS4 must establish the necessary requirements for erosion and sediment control Best Management Practices (BMPs) and methods to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste. This will serve as guidance for construction site operators to establish control measures appropriate to their activities and size. Finally, the MS4 must establish procedures for site plan review, receipt and consideration of public input, and inspection and enforcement of controls. SWMP objectives are:

- Develop erosion and sediment control and waste control requirements for construction sites.
- Develop procedures for site plan review to ensure consistency with local erosion and sediment control requirements.
- Develop procedures for receipt and consideration of public input.
- Develop procedures for inspection and enforcement to include identification of priority sites based on characteristics such as nature of the construction activities, topography, and the characteristics of soils and receiving water quality.

5. Post-Construction Site Stormwater Management In New Development and Redevelopment

Post-construction stormwater management in new development and redevelopment focuses on implementation of controls that will try to maintain good water quality conditions after an area has been developed or after construction. This minimum control includes three parts. First, the MS4s are required to develop and implement structural and non-structural BMPs. Many studies have shown that it is much easier and more cost-effective to control pollution at its source rather than after it enters into an MS4. For this reason, it is important to consider BMPs that may be needed for post-construction pollution control prior to the construction of an area. Minimization of impervious areas, wetland protection, and vegetated drainage ways are some of the controls that may be considered for use during the design of a new development or redevelopment project. The BMPs that are chosen should be appropriate for the community that it is to serve, minimize water quality impacts, and try to maintain pre-development runoff conditions. Second, regulations and ordinances will be created to establish requirements for post-construction runoff from new development and redevelopment projects. Third, the MS4 needs to develop a mechanism to ensure that there is long-term operation and maintenance of the BMPs. The SWMP objectives are:

- Develop and implement structural and non-structural BMPs.
- Develop ordinances or regulations for runoff from new development and redevelopment projects.
- Develop a mechanism to ensure long-term operation and maintenance of the BMPs.

6. Pollution Prevention/Good Housekeeping For Municipal Operations

Pollution prevention/good housekeeping for municipal operations is a minimum control measure designed to emphasize the operation and maintenance of MS4s and proper training of municipal employees. Performing municipal activities in a careful and proper manner prevents or reduces pollutant runoff. Municipal operations include parks, golf courses and open space maintenance; fleet maintenance; new construction or land disturbance; building oversight; planning; and stormwater system maintenance. The following items shall be considered when developing this program:

- Maintenance activities
- Maintenance schedules
- Long-term inspection procedures for structural and non-structural stormwater controls to reduce floatables and other pollutants discharged from the separate storm sewer.
- Controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, fleet or maintenance shops with outdoor storage areas, salt/sand storage locations disposal areas, and waste transfer stations.
- Procedures for properly disposing of waste removed from the separate storm sewers and areas listed above (such as dredge spoil, accumulated sediments, floatables, and other debris.)

- Ways to ensure that new flood management projects assess the impacts on water quality and examine existing projects for protection devices or practices.

7. Industrial Stormwater Sources

   This MCM is only applies to Level 4 MS4s. The City of Victoria is considered a Level 3 MS4 and is thereby exempt from this MCM. However, it is important to note that the City does have an Industrial Storm Water Ordinance that it uses to regulate, monitor, inspect and enforce stormwater discharges from local industries. While this SWMP will not specifically address this MCM, the City will continue to use the existing ordinance to regulate local industry and will update the ordinance as needed.

8. Authorization for Construction Activities where the Small MS4 is the Site Operator

   The development of this MCM for construction activities, where the small MS4 is the site operator, is optional and provides an alternative to the MS4 operator seeking coverage under General Permit TXR150000 for each construction activity. The City has chosen to opt out of this MCM as it rarely performs construction on a large enough scale to require coverage under the General Permit. Most large construction projects are performed by a contractor who would be considered the site operator and therefore required to obtain the permit coverage.

Definitions (40 Code of Federal Regulations §122)

BMPs (Best Management Practices) – schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of "waters of the United States." BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

CWA – Clean Water Act

General Permit – Refers to the TCEQ's General Permit to Discharge Stormwater under the Texas Pollutant Discharge elimination System.

Illicit Discharge – any discharge to a municipal separate storm sewer (MS4) that is not entirely composed of stormwater except discharges pursuant to the TPDES General permit No. TXR040000 or separate authorization and discharges resulting from firefighting activities.

MEP – Maximum Extent Practicable

MS4 – Municipal Separate Storm Sewer System – a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains).

NPDES (National Pollutant Discharge Elimination System) – National program for issuing, modifying, revoking and reissuing, terminating, imposing and enforcing pretreatment requirements, under sections 307, 402, 318, and 405 of CWA.

Outfall – a point source at the point where a municipal separate storm sewer discharges to waters of the United States.

Pollutant(s) of concern – For the purpose of this permit, includes biochemical oxygen demand (BOD), sediment or a parameter that addresses sediment (such as total suspended solids (TSS), turbidity or siltation), pathogens, oil and grease, and any pollutant that has been identified as cause of impairment of the water body that will receive a discharge from an MS4.

Redevelopment – alterations of a property that change the footprint of a site or building in such a way that results in the disturbance of equal to or greater than 1 acre of land.

Document Organization

This Stormwater Management Program (SWMP) is organized to aid development and implementation of the programs required by the Phase II Stormwater Regulations, and to assist in completion of permit notification documents (NOI) and tracking progress for the Annual Reports.

Part I of the Stormwater Management Program provides background information on the City of Victoria.

Following the City of Victoria's background description, the required six minimum control measures (MCMs) are described in Part II of the Stormwater Management Plan.

For each minimum control measure, the following are discussed:

Regulatory Requirement	The reference from the Small MS4 General Permits (TPDES General Permit TXR04000 – Dated August 15, 2024) is provided for each minimum control measure.
Selected BMPs	A description of the best management practices the City of Victoria will implement to address the regulatory requirement.

Part III of the Stormwater Management Plan provides the following:

Measurable Goals (MGs)	The TCEQ requires the City of Victoria to designate a measurable goal for each BMP.
Schedule	The implementation schedule for each BMP is described.
Responsible Persons	The person or position responsible for implementation of each BMP is provided.

The TCEQ has identified specific required elements to be included in the SWMP as part of the General Permit Application (Notice of Intent, NOI). The information is detailed in a manner that facilitates the implementation of the SWMP and ensures accurate documentation of progress in the mandatory Annual Report.

Part I: Background of the City of Victoria

Nestled beside the meandering Guadalupe River, the City of Victoria is located at the convergence of U.S. Highways 59, 77 and 87 in Victoria County. With a population of 65,800, Victoria is the largest city in the central coastal region known as the Golden Crescent, a group of seven Texas counties including Calhoun, Dewitt, Goliad, Gonzales, Jackson, and Lavaca. Major Texas metropolitan areas of Houston (124 miles), San Antonio (114 miles), Austin (122 miles), and Corpus Christi (85 miles) are within a two-hour drive. In addition, it is just 30 miles inland from the Gulf of Mexico.

The City of Victoria is accessible by three U.S. highways, rail, commercial air, and a barge canal connected to the Gulf Intra-coastal Waterway, it offers tremendous growth potential for manufacturing and distribution facilities as well as recreational and cultural opportunities. Victoria lies about 105 feet above sea level.

Victoria is located on the South-central Texas Coastal Plains; the area enjoys moderate temperatures and mild weather conditions throughout the year. At a latitude of 28 degrees above the equator, the area climate is comparable to Orlando, Florida. Annual precipitation averages 36 inches per year with a mean annual temperature of 71 degrees. The surrounding countryside is flat with a majority of the land being used for grazing and cultivation.

The City of Victoria is a home-rule city governed by a City Council, which appoints the City Manager, City Attorney and specified other officials.

The City of Victoria does not have zoning. However, it does have an active and professional Development Services Department. Land use is generally controlled through City requirements for building permits and certificates of occupancy. Land uses are further restricted through minimum construction requirements, infrastructure requirements, off-street parking requirements, screening-fence requirements, landscaping requirements and private restrictive covenants.

As a home-rule city in Texas, Victoria has authority to control many stormwater runoff issues.

Stormwater is generally managed by routing it through street gutters and various creeks and ditches to the Guadalupe River, which empties into the Gulf of Mexico. The City's Department of Public Works maintains and handles the design of the part of Victoria's network of stormwater discharge mechanisms that is owned or managed by the city. Settling basins are appropriate in some parts of Victoria's drainage system. However, due to Victoria's location on a coastal plain, in some areas, the grade is so slight that settling basins are unnecessary or impractical.

The City has four (4) building inspectors. In addition, the City's Public Works Department has five (5) construction inspectors and/or administrators and eight (8) Certified Stormwater Inspectors. All of these persons are empowered to inspect and correct stormwater or illicit discharge violations. The City's building inspectors will be able to inspect and implement construction regulations during their regular inspections of construction sites. The City's Public Works Department will be able to inspect and interdict many illegal discharges of non-stormwater into the City's stormwater collection system. The City's Public Information Officer will be able to engage in outreach and publicity concerning the SWMP.

On August 12, 2007, EPA delegated authority to issue MS4 Stormwater discharge permits to the State of Texas. Since that time, the City of Victoria has operated, complied and completed all requirements with said general permits during each renewal term. The new general permit, issued on August 15, 2024, requires the MS4 operators to update and revise their SWMP(s) to meet new requirements. The MCMs listed below have been designed to meet these requirements.

Part II: Minimum Control Measures
Regulatory Requirements for a Level 3 Phase II Small MS4

1. Public Education and Outreach

1.1 Regulatory Requirements

Refer to the MS4 General Permit, Part IV.D.1 for the MCM 1 – Public Education and Outreach requirements.

1.2 Selected BMPs

The City of Victoria currently focuses its Public Education and Outreach efforts on the general public using the following methods:

- BMP 1.1: MS4 Operator's Website
  The City of Victoria will continue to use the municipal website to inform the public about the stormwater management program. It will include general stormwater quality information as well as topics of interest to the general public to ensure that it is meeting the City's goal of educating the general public on the importance of stormwater pollution prevention.

- BMP 1.2: Social Media Posts/Campaign
  The City of Victoria will continue to use Facebook and Instagram social media platforms in collaboration with the Environmental Services, Solid Waste, and Public Information Office departments. The message shall address ways attendees can minimize or avoid adverse stormwater impacts or practices to improve the quality of stormwater runoff. The messages shall be seasonally appropriate. Posts shall be made each quarter and shall be visible for the full year, each year.

- BMP 1.3: Media/Advertising in Areas of High Visibility
  The City of Victoria will develop and advertise topics that address activities or pollutants of concern on a local billboard. The billboard will be active for minimum of 3 weeks each year.

- BMP 1.4: Publish Articles in Local Newspaper or Newsletter (may be electronic)
  The City of Victoria will continue to publish articles in the local newspaper containing relevant facts about Stormwater Pollution and Prevention to ensure the City's goal of educating the general public on stormwater pollution prevention is being met. Two articles must be published or emailed to target audience groups.
  each year.

- BMP 1.5: Fact Sheets/Brochures/Utility Bill Inserts/Door Hangers
  The City of Victoria will develop new stormwater education materials and distribute to all residents once a year. In addition, new account holders will receive the information when they visit the new account's office. Information will include messages about the Stormwater Management Program that are of interest to the general public and discuss residential issues. The City will review and update this material annually to ensure that it is meeting the goal of educating the general public on the importance of stormwater pollution prevention.

- BMP 1.6: Promote, Host, or Develop Educational Meetings, Seminars, or Trainings
  The City of Victoria will promote or host Do's and Don'ts trainings for other City departments, such as Parks, Environmental Services, and Solid Waste. The Department of Public Works also partners and promotes events with the City's Environmental Services Department Keep Victoria Beautiful clean up events. The Department of Public Works also provides educational information for kids and adults at events.

2. Public Involvement/Participation

2.1 Regulatory Requirement

Refer to the MS4 General Permit, Part IV.D.2. for the MCM 2 – Public Involvement/Participation.

2.2 Selected BMPs

- BMP 2.1: Educational display/booths
  The Department of Public Works participates in National Night Out annually. Educational materials will be available at this event.

- BMP 2.2: Clean-Up Events
  The Department of Public Works promotes and assists the Environmental Services Department with Spring and Fall Clean-Up events. The events consist of City staff and hundreds of volunteers collecting litter. The clean-up events take place along Zac Lentz Pkwy for approximately 2.2 miles. The Department of Public Works also provides bags with educational items at the events.

- BMP 2.3: Hold Events to Train Residents to Cover Stormwater Topics
  The City of Victoria will hold at least one project or training annually on a stormwater related topic.

- BMP 2.4: MS4 Area-Wide Stormwater Survey for Input
  The City of Victoria will develop a MS4 area-wide survey for all residents. The survey will be advertised in bill inserts and social media.

3. Illicit Discharge Detection and Elimination (IDDE)

3.1 Regulatory Requirement

Refer to the MS4 General Permit, Part IV.D.3. for the MCM 3 – Illicit Discharge Detection and Elimination (IDDE).

3.2 Selected BMPs

The City of Victoria currently has the following programs in regard to Illicit Discharge Detection and Elimination:

- BMP 3.1: MS4 Mapping
  The City of Victoria has developed a storm sewer system layer for the GIS map, showing the location of storm sewer pipes, ditches and other conveyances owned by the City of Victoria including the drainage area for each outfall and the location of all major outfalls and the names and locations of all waters of the U.S. that receive discharges from those outfalls.

- BMP 3.2: Staff Training
  The Department of Public Works conducts annual training for 100% of MS4 field staff that may come into contact with or otherwise observe an illicit discharge, illegal dumping, or illicit connection to the MS4 as a part of their normal job responsibilities.

- BMP 3.3: Public Reporting of Illicit Discharges and Spills
  The Department of Public Works has a Customer Service Request available on the City website. The Tracking system will need to be developed. The City will investigate 100% of known illicit discharge and illegal dumping incidents. The City will inspect the public reporting mechanism for functionality at least 1 time per year. The City will publicize the reporting mechanism at least 2 times per year.

- BMP 3.4: Onsite procedures for Responding to Spills
  The City will develop written procedures for responding to illicit discharges, illegal dumping, and spills that will be reviewed and updated annually to make improvements where applicable.

- BMP 3.5: Source Investigation and Elimination
  The City of Victoria has developed a program to detect and address illicit and non-stormwater discharges including illegal dumping into the storm sewer system. The City uses a work order tracking system that collects information such as date, time, issues, corrective actions, and photos. The City will evaluate existing programs and identify additional program requirements and resource needs.

- BMP 3.6: IDDE Corrective Actions
  The City will notify 100% of responsible parties of illicit discharges or illegal dumping where a source has been determined within 24 hours with the necessary corrective actions to eliminate the illicit discharge. The City uses a work order system to track corrective actions. Additionally, the City has procedures for notification, such as door tags.

- BMP 3.7: IDDE Inspection Procedures
  The City will develop written inspection procedures that will be reviewed and updated at least one time annually to address changes and make improvements.

- BMP 3.8: Inspections in Response to Complaints
  The City will conduct inspections and follow up inspections in response to 100% of complaints each year according to the established procedures.

- BMP 3.9: Follow-up Investigations/Field Screenings
  The City will conduct follow-up investigations or field screenings in response to 100% of notifications each year. Follow-up investigations must be completed within 5 business days, on average.

4. Construction Site Stormwater Runoff Controls

4.1 Regulatory Requirement

Refer to the MS4 General Permit, Part IV.D.4 for the MCM 4 – Construction Site Stormwater Controls.

4.2 Selected BMPs

- BMP 4.1: Ordinance
  The City of Victoria has developed, implemented and enforces a Construction Site Stormwater control ordinance and requires construction site operators to comply. In addition, the City has created and responds to a stormwater reporting hotline and has a plan review process for all construction sites.

- BMP 4.2: Site Review Procedures
  The City of Victoria will evaluate the existing site plan review process and implement any changes necessary to insure it conforms to any ordinances or other regulatory mechanisms regarding construction site stormwater control. Site plans are reviewed and placed on a tracking list to ensure Notice of Intents are received.

- BMP 4.3: Construction Site Inspection
  The City will review and update inspection procedures at least one time annually to address changes and make improvements to the established procedures where applicable. The City will conduct inspections at a minimum of 80% of active construction sites annually and conduct follow up inspections in 100% of cases where necessary.

- BMP 4.4: Public Reporting
  The Department of Public Works has a Customer Service Request available on the City website and will continue the use of its reporting hotline for information collection for the public to report construction site problems. This will continue to facilitate the ability of the public to provide information that will assist in detection of problem discharges.

- BMP 4.5: Staff Training
  The City of Victoria MS4 staff participate in the National Stormwater training annually that covers implementation of the construction stormwater program.

- BMP 4.6: Construction Site Inventory
  The City will develop and maintain an annual inventory of 100% of TPDES permitted active public and private construction sites in the small MS4 area, which result in a total land disturbance of one or more acres or that result in a total land disturbance of less than one acre if part of a larger common plan or development or sale.

5. Post Construction Stormwater Management for New Development and Redevelopment

5.1 Regulatory Requirement

Refer to the MS4 General Permit, Part IV.D.5 for the MCM 5 – Post Construction Stormwater Management for New Development and Redevelopment.

5.2 Selected BMPs

- BMP 5.1: Post Construction Ordinance
  The City of Victoria will review the existing Post Construction Storm Water Management Ordinance, as well as the Subdivision Ordinance and the Storm Drainage Design Criteria manual. If necessary, these documents will be updated to ensure that post-construction stormwater management for new development and redevelopment are updated to reflect requirements for post-construction runoff controls from new development and redevelopment and ensure proper long-term operation and maintenance of controls.

- BMP 5.2: Enforcement Records
  The City of Victoria will document and maintain records of 100% of enforcement actions taken each year and ensure 100% of enforcement records can be made available to TCEQ for review within 24 hours of request. The City will use its work order tracking system to notate actions and follow-up items.

- BMP 5.3: Operation and Maintenance of Stormwater Controls
  The City of Victoria will implement a maintenance plan and schedule addressing 100% of stormwater control measures where the small MS4 operator is responsible for maintenance annually. The City shall ensure the long-term operation and maintenance of structural stormwater control measures installed through the following approaches:

  (1) Maintenance performed by the permittee. (See Part IV.D.6)

6. Pollution Prevention and Good Housekeeping for Municipal Operations

6.1 Regulatory Requirement

Refer to the MS4 General Permit, Part IV.D.6 for the MCM 6 – Pollution Prevention and Good Housekeeping for Municipal Operations.

6.2 Selected BMPs

- BMP 6.1: Permittee-owned Facilities and Control Inventory
  The City of Victoria developed and maintains an inventory of facilities and stormwater controls that it owns and operates. These facilities are considered a priority because of their high potential to generate stormwater pollutants. The City also developed facility specific SOPs for high priority facilities. Each SOP includes stormwater controls that are specific to each high priority facility. The City also developed and implemented an annual inspection program for high priority facilities. In addition, the City identified those facilities and stormwater controls on its GIS stormwater layer. The City will continue to follow its SOPs and complete annual inspections for its high priority facilities.

- BMP 6.2: Staff Training
  The City of Victoria has developed and implemented a municipal employee training program. The City will evaluate its current training program for effectiveness and modify or obtain additional education tools as needed. The City will continue to provide appropriate training to employees.

- BMP 6.3: Disposal of Waste Materials
  The City of Victoria will continue to evaluate its current method of disposal of wastes removed from structural controls or collected as a result of municipal operation and maintenance activities.

- BMP 6.4: Contractor Requirements and Oversight
  The City of Victoria will review and update, if necessary, its current method to provide legal authority over contractors, who perform maintenance activities on City owned facilities, to ensure they comply with the City's stormwater control measures. The City will also evaluate the current contractor oversight procedures to ensure that contractors are complying with the City's stormwater requirements.

- BMP 6.5: Assessment of Permittee Operations and Maintenance
  The City of Victoria will evaluate its operation and maintenance activities for their potential to discharge pollutants, including pollutants of concern for each activity. Pollution prevention measures will be reviewed and updated as necessary, for each activity as well as an inspection program.

- BMP 6.6: Pollutants of Concern
  The City of Victoria has identified Pollutants of Concern (POCs) that could be discharged from all of the O&M activities. A list of 100% pollutants identified will be maintained. Permittee-owned facilities managed by other departments, such as Parks, Fleet Services, etc., conduct an annual inspection and provide the report to the Department of Public Works.

- BMP 6.7: Pollution Prevention Measures
  The City of Victoria will develop and implement the following pollution prevention measures that will reduce the discharge of pollutants in stormwater from the permittee-owned operations.
  (2) Place barriers around or conduct runoff away from 100% of deicing chemical storage areas to prevent discharge into surface waters each year.
  (3) 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.

- BMP 6.8: Inspection of Pollution Prevention Measures
  The City of Victoria will visually inspect 100% of pollution prevention measures implemented at permittee-owned facilities to ensure they are working properly at least one time annually. Written procedures will be developed and maintained that describe the frequency of inspections and how they will be conducted. Procedures will be reviewed and updated at least one time annually and records will be available for review by the TCEQ within 24 hours of a request.

- BMP 6.9: Structural Control Maintenance
  The City of Victoria has developed a program of maintaining structural controls in place and a program of long-term inspection procedures for those controls identified.

- BMP 6.10: Storm Sewer System Operation and Maintenance Program
  The City of Victoria developed and implemented an O&M program to reduce the collection of pollutants in catch basins and other surface draining structures each year. The following two measurable goals will be implemented:
  (1) Inspect at least 20% of the small MS4 owned and operated stormwater inlets in problem areas identified by the small MS4 operator.
  (2) Collect and dispose of or recycle used oil and other household hazardous waste (HHW) from the public in at least three events each year. An event is any day in which the public has an opportunity to dispose of or recycle HHW either through collection or drop off.

  The City of Victoria provides a household HHW collection service that is contracted to Waste Management. Residents can schedule a collection where a HHW kit is mailed and is collected at the resident's doorstep on an agreed-upon date. The service is available all year as many times as needed.

- BMP 6.11: Storm Sewer Operation and Maintenance Problem Areas
  The City will identify and prioritize problem areas for increased inspection. A list of 100% of the identified potential problem areas will be developed and maintained. The City will identify and prioritize problem areas for increased inspection and review and update the list of potential problem areas at least one time annually to address changes or additions to the list.

- BMP 6.12: Operations and Maintenance to Reduce Pollutants from Roads
  The City of Victoria has developed and implemented a comprehensive street sweeping program and believes that regular street sweeping is the best method of removing pollutants from our roadways. The entire City is swept bi-annually, and the City documents the amount of debris collected and disposed of. The City will review its street sweeping operations to make sure they are as effective as possible and will make changes as deemed necessary.

  The following measurable goals will be implemented:
  (1) A street sweeping and cleaning program to address 75% of the MS4 area where street sweeping is technically feasible annually.
  (2) Ensure that trash receptacles, or similar trash capturing devices are provided and maintained in 100% of the areas identified as high trash generating areas within the areas where street sweeping is technically infeasible (such as areas near parks, event spaces, etc.).

- BMP 6.13: Mapping of Facilities
  The City of Victoria will maintain and update, as necessary, the existing GIS map of City-owned and operated facilities and stormwater controls. The GIS map will be reviewed and updated at least one time annually.

- BMP 6.14: Facility Assessment
  The City of Victoria will review 100% of the facilities identified in Part IV.D.6.(b) at least one time per permit term for their potential to discharge pollutants into stormwater. Based on the assessment, the City shall identify as high priority those facilities that have a high potential to generate stormwater pollutants. A list of 100% of the identified facilities must be developed and maintained each year. The documentation must also include any identified deficiencies and corrective actions taken.

- BMP 6.15: Development of Facility-Specific Procedures
  The City of Victoria has developed facility-specific stormwater management SOPs for 100% of the MS4 owned and operated facilities. A description of 100% of the BMPs developed to comply with Part IV.D.6.(c)(6) must be included in each facility-specific SOP. The SOPs will be reviewed and updated at least one time annually to address changes or additions. If requested, SOPs must be made available to TCEQ within 24 hours of the request for review.

- BMP 6.16: Stormwater Controls for High Priority Facilities

  - *General Good Housekeeping*
    The City of Victoria will shelter from exposure to stormwater 100% of material with a potential to contribute to stormwater pollution (such as, fertilizers, solvents, paints, cleaners, automotive products, etc.) each year. The City utilizes silt fencing and secondary containment for hazardous materials.

  - *Deicing and Anti-Icing Material Storage*
    The City will ensure that 100% of stormwater runoff from storage piles of salt and other de-icing and anti-icing materials is not discharged each year. The City utilizes deicing rock where silt fencing is placed around the piles.

  - *Fueling and Vehicle Maintenance*
    The City will implement SOPs that address spill prevention and spill control at 100% of permittee-owned and operated vehicle fueling, vehicle maintenance, and bulk fuel delivery facilities each year. The SOPs will be reviewed and updated at least once annually.

  - *Equipment and Vehicle Washing*
    The City of Victoria will implement SOPs that address equipment and vehicle washing activities at 100% of the permittee-owned and operated facilities where washing occurs. The SOPs will be reviewed and updated at least one time annually.

To ensure that wastewater is not discharged under this general permit, the permittee's SOP must include one or more of the following:

- installing a vehicle wash reclaim system,
- capturing and hauling the wastewater for proper disposal,
- connecting to sanitary sewer (where applicable and approved by local authorities),
- ceasing the washing activity, or
- applying for and obtaining a separate TPDES permit.

- BMP 6.17: Inspections
  The City has implemented an inspection program, which at a minimum includes inspections of 100% of high priority permittee-owned facilities one time per year. The results of 100% of the inspections and observations must be documented and available for review by the TCEQ each year.

Part III: Implementation Schedule

MCM No.	BMP No.	BMP Description	Responsible Department	Target Audience	Pollutant	Measurable Goal	Goal Completed By				
							Year 1 '25-'26	Year 2 '26-'27	Year 3 '27-'28	Year 4 '28-'29	Year 5 '29
1	1.1	MS4 Operator's Website	Department of Public Works	Residents, Visitors, Businesses	(1) Grass clippings and leaf litter (2) Illegal disposal of hazardous waste (3) Oil, grease, fluids from vehicles (4) Washwater/grey water	Maintain website with current and accurate information at least 1x annually.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
						Post SWMP within 30 days after approval.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
						Post annual reports within 30 days after due date.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
1	1.2	Social Media Posts/Campaign	Department of Public Works	Residents, Businesses	(1) Grass clippings and leaf litter (2) Illegal disposal of hazardous waste (3) Oil, grease, fluids from vehicles (4) Washwater/grey water	Post a minimum of 1 post per quarter. Messages must be seasonally appropriate.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
1	1.3	Media/Advertising in Areas of High Visibility	Department of Public Works	Residents, Visitors, Businesses	(1) Grass clippings and leaf litter (2) Illegal disposal of hazardous waste (3) Oil, grease, fluids from vehicles (4) Washwater/grey water	Advertisement must be active for a minimum of 3 weeks each year.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
1	1.4	Publish Articles in Local Newspaper or Newsletter (may be electronic)	Department of Public Works	Residents, Businesses	(1) Grass clippings and leaf litter (2) Illegal disposal of hazardous waste (3) Oil, grease, fluids from vehicles (4) Washwater/grey water	Publish or email a minimum of 2 articles each year.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
1	1.5	Fact Sheets/ Brochures/ Utility Bill Inserts/ Door Hangers	Department of Public Works	Residents, Businesses	(1) Grass clippings and leaf litter (2) Illegal disposal of hazardous waste (3) Oil, grease, fluids from vehicles (4) Washwater/grey water	75% of intended audience.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
						Develop tracking system to estimate percentage of intended audience.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
1	1.6	Promote, Host, or Develop Educational Meetings, Seminars, or Trainings	Department of Public Works	Residents, Businesses	(1) Litter, trash containment	Two events annually.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31

MCM No.	BMP No.	BMP Description	Responsible Department	Measurable Goal	Goal Completed By				
					Year 1 '25-'26	Year 2 '26-'27	Year 3 '27-'28	Year 4 '28-'29	Year 5 '29
2	2.1	Educational display/booths	Department of Public Works	Provide or support 1 booth/display at minimum annually.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
2	2.2	Clean-Up Events	Department of Public Works	2 miles of roadside annually	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
2	2.3	Hold Events to Train Residents to Cover Stormwater Topics	Department of Public Works	Provide or support at minimum one project or training annually.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
2	2.4	MS4 Area-Wide Stormwater Survey for Input	Department of Public Works	Provide or support a minimum of 1 public survey annually for input on the program implementation to be distributed to at least 75% of the intended audience. Develop and implement a tracking system to estimate what percentage of the intended audience is reached.	July 31	July 31	July 31	July 31	July 31

MCM No.	BMP No.	BMP Description	Responsible Department	Measurable Goal	Goal Completed By				
					Year 1 '25-'26	Year 2 '26-'27	Year 3 '27-'28	Year 4 '28-'29	Year 5 '29
3	3.1	MS4 Mapping	Department of Public Works	Review and update at least 1x annually.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
3	3.2	Staff Training	Department of Public Works	Minimum of 1 training for 100% of MS4 field staff.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
3	3.3	Public Reporting of Illicit Discharges and Spills	Department of Public Works	Maintain a minimum of 1 reporting mechanism 100% of the time during permit term.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
				Publicize the public reporting mechanism a minimum of 2x annually.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
				Develop and implement a tracking system to estimate the percentage of intended audience.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
				Public reporting mechanism must be publicized on MS4 website.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
3	3.4	Onsite procedures for Responding to Spills	Department of Public Works	Review and update at least 1x annually.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
3	3.5	Source Investigation and Elimination	Department of Public Works	Respond to 100% of known illicit discharges and illegal dumping incidents each year.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
				Respond to 100% high priority discharges each year.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
				The City notifies the TCEQ regional office for 100% of known illicit discharges and illegal dumping incidents where the City does not have jurisdiction.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
				Notify the TCEQ immediately of 100% of illicit flows believed to be an immediate threat to human health or the environment.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
3	3.6	IDDE Corrective Actions	Department of Public Works	Notify 100% of responsible parties of illicit discharges or illegal dumping where a source has been determined within 24 hours with the necessary corrective actions to eliminate the illicit discharge.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
3	3.7	IDDE Inspection Procedures	Department of Public Works	Review and update at least 1x annually.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
3	3.8	Inspections in Response to Complaints	Department of Public Works	Conduct inspections in response to 100% of complaints each year.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
				Conduct follow up inspections in 100% of cases each year where necessary	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
3	3.9	Follow-up Investigations/ Field Screenings	Department of Public Works	Conduct follow-up investigations or field screening in response to 100% of notifications each year.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
				Complete follow-up investigations or field screenings within 5 business days, on average.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31

MCM No.	BMP No.	BMP Description	Responsible Department	Measurable Goal	Goal Completed By				
					Year 1 '25-'26	Year 2 '26-'27	Year 3 '27-'28	Year 4 '28-'29	Year 5 '29
4	4.1	Ordinance	Department of Public Works	Review and update at least 1x during permit term.				Dec. 31	
4	4.2	Site Review Procedures	Department of Public Works	Review and update at least 1x during permit term.				Dec. 31	
4	4.3	Construction Site Inspection	Department of Public Works	Review and update inspection procedures at least 1x annually	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
			Department of Public Works	Conduct inspections at a minimum of 80% of active construction sites annually.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
			Department of Public Works	Each year, conduct follow-up inspections in 100% of cases where necessary.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
4	4.4	Public Reporting	Department of Public Works	Review and update procedures of information submitted by the public at least 1x a year.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
			Department of Public Works	Maintain one webpage, hotline, or similar method for public reporting.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
4	4.5	Staff Training	Department of Public Works	Minimum of 1 training for 100% of MS4 field staff.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
4	4.6	Construction Site Inventory	Department of Public Works	Maintain an inventory of 100% of TPDES permitted active public and private construction sites.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31

MCM No.	BMP No.	BMP Description	Responsible Department	Measurable Goal	Goal Completed By				
					Year 1 '25-'26	Year 2 '26-'27	Year 3 '27-'28	Year 4 '28-'29	Year 5 '29
5	5.1	Post Construction Ordinance	Department of Public Works	Review and update at least 1x during permit term.				Dec. 31	
5	5.2	Enforcement Records	Department of Public Works	Maintain records of 100% of enforcement actions taken each year.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
5	5.3	Operation and Maintenance of Stormwater Controls	Department of Public Works	Each year, implement a maintenance plan and schedule addressing 100% of stormwater controls where the MS4 is the operator.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
				Each year, require 100% of owners or operators of any new development or redeveloped site to implement a maintenance plan for structural controls.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
				Require the site owner and operator to maintain documentation, such as a tracking log, onsite of 100% of the maintenance performed.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31

MCM No.	BMP No.	BMP Description	Responsible Department	Measurable Goal	Goal Completed By				
					Year 1 '25-'26	Year 2 '26-'27	Year 3 '27-'28	Year 4 '28-'29	Year 5 '29
6	6.1	Permittee-owned Facilities and Control Inventory	Department of Public Works	Develop and maintain an annual inventory for 100% of the MS4 owned and operated facilities and controls.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
6	6.2	Staff Training	Department of Public Works	Minimum of 1 training for 100% of employees involved in implementing pollution prevention and good housekeeping practices.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
6	6.3	Disposal of Waste Materials	Department of Public Works	Ensure 100% of waste from MS4 is disposed of properly.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
6	6.4	Contractor Requirements and Oversight	Department of Public Works	Ensure that 100% of contractors 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.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
				Implement oversight procedures of contractor activities in 100% of contracts to ensure that contractors are using appropriate control measures and SOPs each year.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
				Oversight procedures must be maintained on-site 100% of the time.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
6	6.5	Assessment of Permittee Operations and Maintenance	Department of Public Works	Evaluate 100% of O&M activities, in conjunction with procedure reviews if appropriate, for their potential to discharge pollutants in stormwater annually.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
6	6.6	Pollutants of Concern	Department of Public Works	Identify pollutants of concern that could be discharged from all of the O&M activities and maintain a list of 100% of the pollutants identified.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
6	6.7	Pollution Prevention Measures	Department of Public Works	Implement the following pollution prevention measures: (1) 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. (2) Place barriers around or conduct runoff away from 100% of deicing chemical storage areas each year.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
6	6.8	Inspection of Pollution Prevention Measures	Department of Public Works	Visually inspect 100% of pollution prevention measures implemented at permittee-owned facilities 1x year.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
				Develop and maintain written procedures that describe the frequency of inspections and how they will be conducted.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
				Review and update the inspection procedures at least 1x year.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
				Maintain a log of 100% of the inspections conducted annually.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
6	6.9	Structural Control Maintenance	Department of Public Works	Perform maintenance of 100% of the structural controls which require maintenance 1x year. Maintenance must follow a plan and schedule developed by the MS4.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31

				Develop and maintain written procedures that define the frequency of inspections and how they will be conducted.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
				Review and update the maintenance procedures at least 1x year.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
6	6.10	Storm Sewer System Operation and Maintenance Program	Department of Public Works	Implement the following: (1) Inspect at least 20% of the MS4 owned and operated stormwater inlets in problem areas identified by the small MS4 operator each year. (2) Collect and dispose of or recycle used oil and other HHW from the public in at least three events each year. An event is any day in which the public has an opportunity to dispose of or recycle HHW either through collection or drop off .	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
6	6.11	Storm Sewer System Operation and Maintenance Problem Areas	Department of Public Works	Develop a list of 100% of the identified potential problem areas. Identify and prioritize problem areas for increased inspection. Review and update the list of potential problem areas at least 1x annually.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
6	6.12	Operations and Maintenance to Reduce Pollutants from Roads	Department of Public Works	Implement the following: (1) A street sweeping and cleaning program to address 75% of the MS4 where street sweeping is feasible annually. Ensure 100% of the MS4 area where street sweeping is feasible is addressed at least 2x by the end of the permit term. One or a combination of the following non-street sweeping controls: (1) Ensure that trash receptacles, or similar trash capturing devices are provided and maintained in 100% of the areas identified as high trash generating areas within the areas where street sweeping is technically infeasible (such as areas near parks, event spaces, etc.).	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
6	6.13	Mapping of Facilities	Department of Public Works	Identify where 100% of the permittee-owned and operated facilities and stormwater controls are located. Review and update 1x annually.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
6	6.14	Facility Assessment	Department of Public Works	Review 100% of the facilities identified at least 1x per permit term.		Dec. 31		Dec. 31	
				Identify *high priority* facilities. A list of 100% of the identified facilities must be developed and maintained each year. Review and update the list of high priority facilities at least 1x annually.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
				Document the results of all the assessments and maintain copies of 100% of the site evaluation checklists used to conduct the assessments each year. The documentation must include the results of the permittee's initial assessment, and any identified deficiencies and corrective actions taken.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
6	6.15	Development of Facility-Specific Procedures	Department of Public Works	Develop facility-specific stormwater management SOPs for 100% of the MS4 owned and operated facilities. A description of 100% of the BMPs developed must be included in each SOP.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
				Review and update the facility-specific SOPs at least 1x annually.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31

6	6.16	Stormwater Controls for High Priority Facilities – *Good Housekeeping*	Department of Public Works	Shelter from exposure to stormwater 100% of material with a potential to contribute to stormwater pollution each year.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
6	6.16	Stormwater Controls for High Priority Facilities – *De-icing and anti-icing material storage*	Department of Public Works	Ensure that 100% of stormwater runoff from storage piles of salt and other de-icing and anti-icing materials is not discharged each year.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
6	6.16	Stormwater Controls for High Priority Facilities – *Fueling and Vehicle Maintenance*	Department of Public Works	Develop and implement SOPs that address spill prevention and spill control at 100% of permittee-owned and operated vehicle fueling, vehicle maintenance, and bulk fuel delivery facilities each year.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
				Review and update the facility specific SOPs at least 1x annually.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
6	6.16	Stormwater Controls for High Priority Facilities – *Equipment and Vehicle Washing*	Department of Public Works	Develop and implement SOPs that address equipment and vehicle washing activities at 100% of the permittee-owned and operated facilities where washing occurs.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
				The permittee's SOP must include one or more of the following and should be reviewed at least 1x annually: (1) installing a vehicle wash reclaim system, (2) capturing and hauling the wastewater for proper disposal, (3) connecting to sanitary sewer, (4) ceasing the washing activity, or (5) applying for and obtaining a separate TPDES permit	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31
6	6.17	Inspections	Department of Public Works	Develop and implement an inspection program, which at a minimum must include inspections of 100% of high priority permittee-owned facilities 1x annually. The results of 100% of the inspections and observations must be documented.	Dec. 31	Dec. 31	Dec. 31	Dec. 31	Dec. 31