Prepared for the City of University Park

City of University Park
Stormwater Management Program
2025-2029

AVO 58281

Stormwater Management Program

for the

City of University Park, Texas

Developed to comply with the requirements of

Texas Pollutant Discharge Elimination System

General Permit No. TXR040000, issued August 15, 2024

Stormwater Phase II MS4 Permit Authorization No. TXR040025

Coverage Effective: November 7, 2025

2025-2029

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AVO 58281

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List of Acronyms

BMP	Best Management Practice
CWA	Clean Water Act
EPA	United States Environmental Protection Agency
ISWM	Integrated Stormwater Management
MCM	Minimum Control Measure
MEP	Maximum Extent Practicable
MS4	Municipal Separate Storm Sewer System
NOC	Notice of Change
NOI	Notice of Intent
NOT	Notice of Termination
NPDES	National Pollutant Discharge Elimination System
SWMP	Stormwater Management Program
SWPPP	Stormwater Pollution Prevention Plan
TCEQ	Texas Commission on Environmental Quality
TPDES	Texas Pollutant Discharge Elimination System
UA	Urbanized Area

Executive Summary

The City of University Park has developed a Stormwater Management Program (SWMP) to comply with the Texas Pollutant Discharge Elimination System (TPDES) General Permit No. TXR040000 (see Appendix B). This regulatory framework is essential for managing stormwater discharges from the City's Municipal Separate Storm Sewer System (MS4) and aims to reduce pollutant levels to protect local water quality.

The original permit was issued on August 13, 2007, a subsequent permit was issued on December 13, 2013, and the third permit was issued on January 24, 2019. A new permit was issued on August 15, 2024, and this new permit supersedes and replaces the previous permit issued in 2019. On November 7, 2025, the City received approval of its Notice of Intent application for authorization under the general stormwater discharge permit. Coverage under the newly issued permit became effective the same day.

The SWMP includes a listing of Best Management Practices (BMPs) that will be implemented by the City to work towards the regulatory standard of reducing pollutants in the City's stormwater to the "maximum extent practicable" (MEP). Existing University Park stormwater programs and activities designed to protect the City's water quality will be supplemented with the BMP activities as needed. The City will follow the measurable goals and implementation schedule provided by TCEQ in the general permit for each of the required BMPs in the SWMP. For the MCMs with selectable BMPs, the City chose BMPs that best align with current practices at the City to continue implementing under this SWMP. The City will abide and meet all specific permit requirements with the goal to reduce pollutants in the City's stormwater to the maximum extent practicable.

This SWMP revises the provisions of the former Stormwater Management Program, dated July 2019. Revisions were made to meet new permit requirements, and changes were made based on the implementation process of BMPs during the previous permit term. This revised SWMP reinforces the City's dedication to protecting water quality, preserving environmental health, and meeting state and federal stormwater management standards. By integrating innovative practices and building on the successes of previous permit terms, the City will continue to reduce pollutants in stormwater, promote community involvement, and ensure compliance with regulatory expectations. The MS4 General Permit, issued on August 15, 2024, will expire on August 14, 2029, unless amended.

1. Plan Development Process

1.1 BACKGROUND

The City of University Park is a predominantly residential community of approximately 25,278 residents and 7,174 residences based on the 2020 census. The City is located approximately five miles north of downtown Dallas, Texas, and is the home of Southern Methodist University. For the period 1995 through 2025, the North Central Texas Council of Governments (NCTCOG) does not anticipate that the number of households will significantly increase as the City is currently fully built-out. The City includes a total land area of 3.7 square miles. A majority of the City is developed, and much of the community was constructed immediately after World War II. The only major water body that transects the City is Turtle Creek.

In developing the SWMP, the City took into consideration its unique characteristics, which include a high percentage of residential and institutional land uses. There are no industrial facilities in the City. An aerial photograph, shown in Figure 1.1, illustrates existing residential development within the City. No major land use changes are anticipated in the near future. Redevelopment of portions of the City for residential or commercial use is anticipated. As a result, the program is focused upon maintenance of existing infrastructure and Best Management Practices (BMPs) that will protect the water quality in an extensively developed community. One of the initial goals of the plan was to better define the location and condition of the storm sewer system, and now the City plans to maintain and update this information.

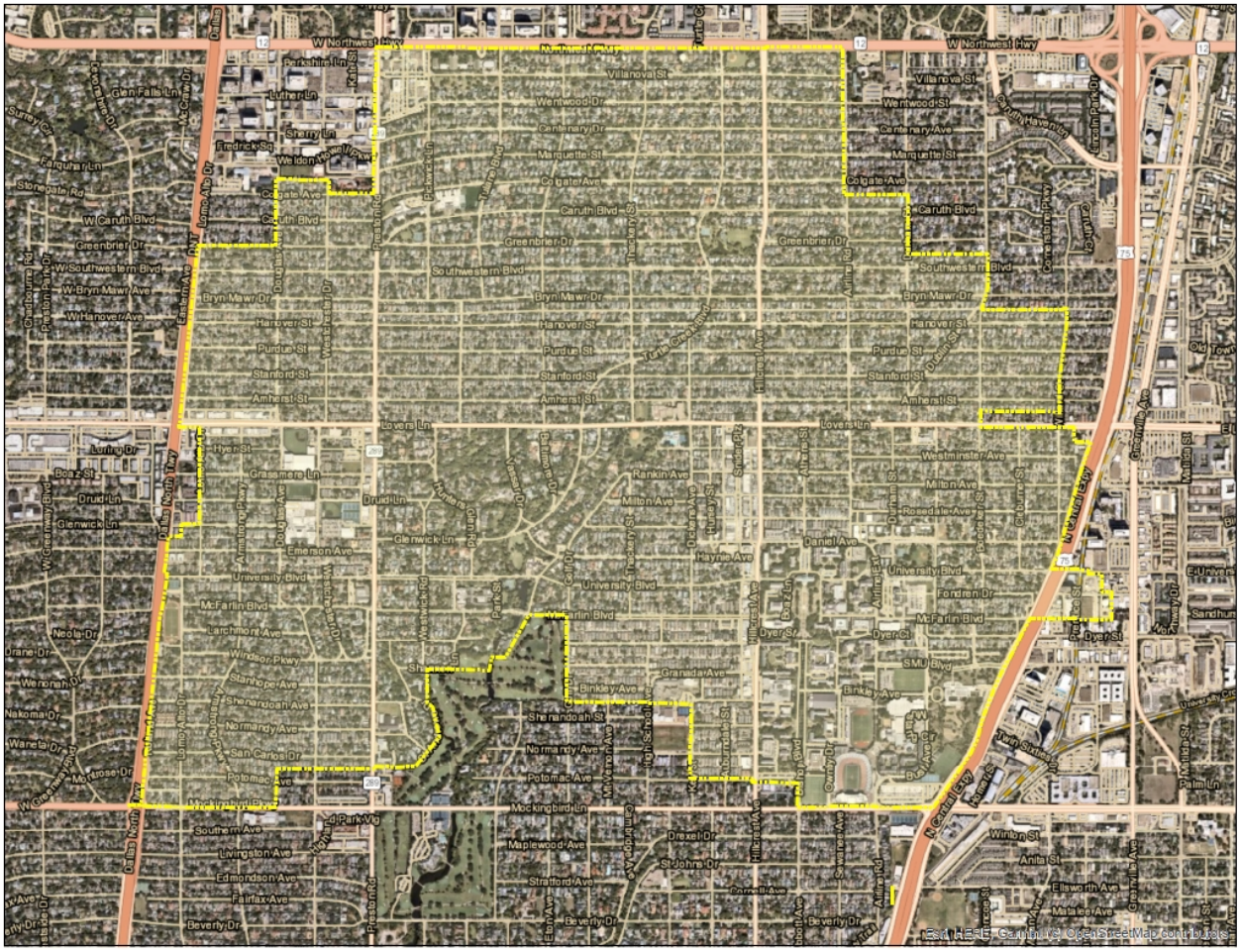
The new permit divides MS4 operators into four levels based on the population served within the 2020 urbanized area. The City of University Park was determined to be a Level 2a Regulated Small MS4, based on the U.S. Census Bureau 2020 census. This category includes traditional small MS4s that serve a population of at least 10,000 but less than 40,000 within an “urban area with a population of at least 50,000 people”.

1.2 PURPOSE AND SCOPE

The City of University Park has developed a Stormwater Management Program (SWMP) in accordance with Texas Pollutant Discharge Elimination System (TPDES) requirements for obtaining authorization for stormwater discharges and certain non-stormwater discharges. This SWMP has been developed in accordance with guidelines published by the Texas Commission on Environmental Quality (TCEQ) for coverage under TPDES General Permit TXR040000 (General Permit). The SWMP has been developed to facilitate the City’s efforts in reducing stormwater pollutants from the City’s municipal separate storm sewer system to the maximum extent practicable as required by the TPDES General Permit.

The SWMP describes specific actions that will be taken over a five-year period to reduce pollutants and protect the City’s stormwater quality. The specific activities to be implemented are referred to as “Best Management Practices” (BMPs). TCEQ has developed these required BMPs that the City will implement for each of the six “Minimum Control Measures” (MCMs) required by the General Permit for Level 2a Small MS4s, such as the City of University Park.

Figure 1: City of University Park Aerial Photograph



Source: Esri, HERE, Garmin, (c) OpenStreetMap contributors

2. Impaired Water Bodies and Total Maximum Daily Load (TMDL) Requirements

2.1 SELECTION OF BENCHMARK AND TARGETED CONTROLS

The City of University Park is located within the watershed for the Upper Trinity River Segment 0805 and indirectly discharges into Upper Trinity River (Segment ID 0805_04), which is in the 5c impairment category according to the 2024 Texas Integrated Report – Texas 303(d) List (Category 5). Table 1 describes the impaired water bodies in the 2024 Texas Integrated Report and I-Plan.

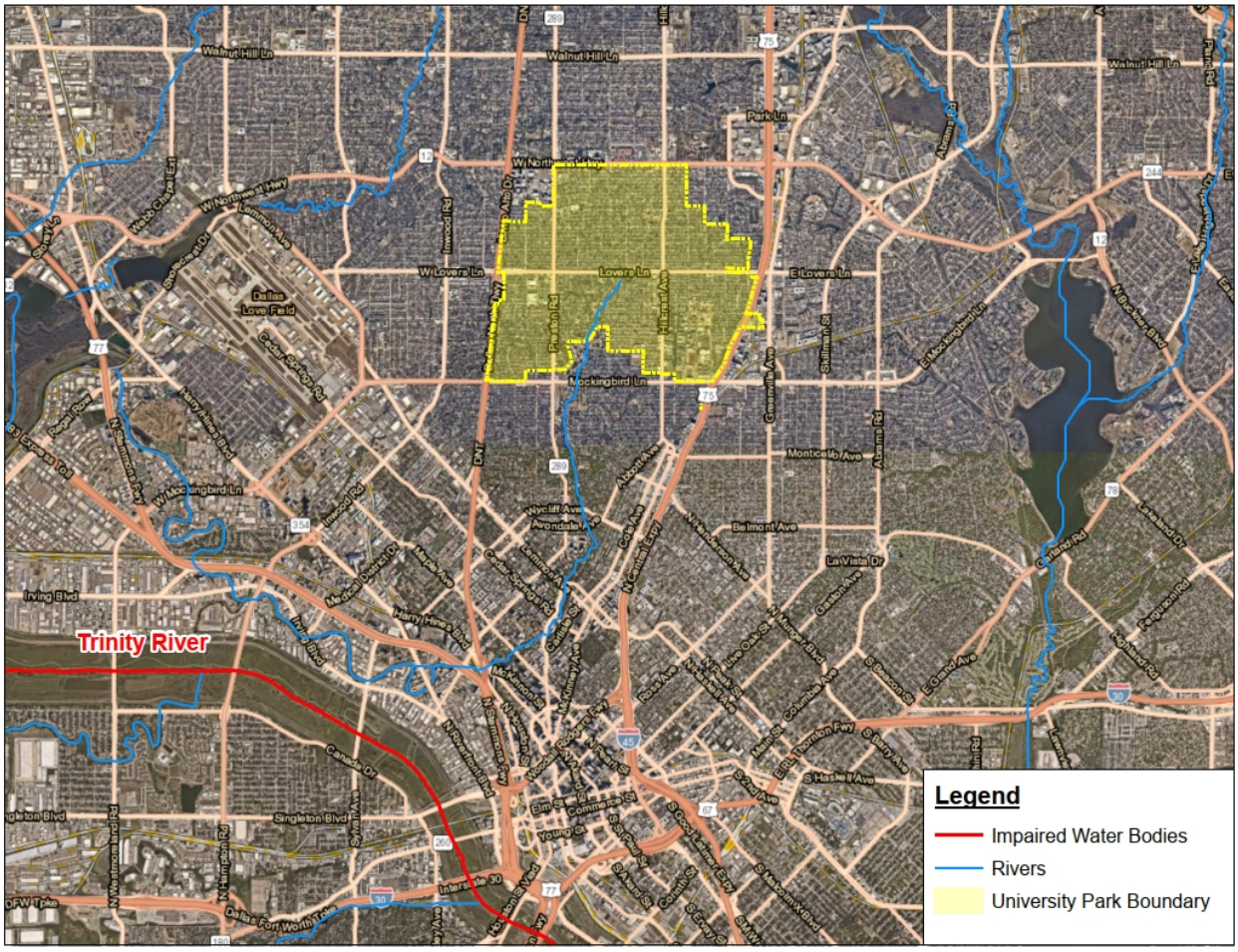
Table 1. Texas 303(d) List - Impaired Water Body

Segment ID	Segment Name	AU ID	Impairment Description	Year First Listed	Impairment Category
0805	Upper Trinity River	0805_04	Dioxin in edible tissue	2010	5c
			PCBs in edible tissue	2002	5c

Discharges indirectly reach the Upper Trinity River segment (0805_04) which is listed on the TMDL Summary Table for chlordane in tissue and bacteria. However, chlordane in tissue is no longer an impairment parameter on the Texas 303(d) List or the Index of All Impaired Waters; therefore, all additional impairment BMPs included in this SWMP are targeted to address bacteria.

Because the Upper Trinity River Segment 0805 is an impaired water body and has a Total Maximum Daily Load (TMDL) associated with it for bacteria, the City must meet requirements in *Part III* of the General Permit for “Impaired Water Bodies and Total Maximum Daily Load (TMDL) Requirements”. A benchmark must be determined along with targeted controls to address implementation towards reducing bacteria levels. A map with the City’s impaired water bodies is shown in Figure 2.

Figure 2: Impaired Water Bodies



“Implementation Plan for Twenty-One Total Maximum Daily Loads for Bacteria in the Greater Trinity River Region” was developed to address steps toward reducing bacteria levels within the Trinity River Region. The original implementation plan (I-Plan) was approved by the TCEQ on December 11, 2013, and addresses implementation strategies for reducing bacteria levels in the watershed. The I-Plan was revised by the TMDL Coordination Committee and stakeholders within the TMDL, on June 27, 2024. The TMDL Coordination Committee periodically assesses the I-Plan for efficiency and effectiveness of the implementation strategies.

The TCEQ determines whether water quality in a water body meets the primary contact recreation use by measuring the levels of indicator bacteria. Escherichia coli (E. coli) are the preferred indicator bacteria for assessment for recreational use in fresh water and were used for analysis to support TMDL development on water bodies in the Greater Trinity River region.

In accordance with the general permit requirements, a benchmark must be determined. Benchmarks are designed to assist in determining if the BMPs established are effective in addressing the pollutant of concern in stormwater discharges from the MS4 to the maximum extent practicable. The benchmark is intended to be a guideline for evaluating progress towards reducing pollutant discharges.

The City has elected to use the Waste Load Allocations (WLA) identified in the I-Plan as the benchmark (See Table 2). All loads are expressed as billion MPN/day, where MPN represents the most probable number. The City of University Park is in Assessment Unit (AU) 0805_04. According to the I-Plan, AU 0805_04 of the Upper Trinity River contains no Wastewater Treatment Facilities (WWTFs) but does contain three permitted industrial facilities and one permitted domestic water treatment plant. However, none of these lies within the City of University Park.

Table 2. TMDL Allocations for the Impaired Assessment Unit

Assessment Unit	Segment Name	TMDL	WLA_{WWTF}[a]	WLA_{SW}[b]	LA_{USL}[c]	MOS[d]	FG[e]
0805_04	Upper Trinity River	22,890	0	1,480	21,310	78.79	16.57

All loads expressed as billion MPN/day
[a]WLA_{WWTF} = waste load allocation for wastewater treatment facilities
[b]WLA_{SW} = waste load allocation for permitted stormwater
[c]LA_{USL} = upstream load application entering the assessment unit
[d]MOS = margin of safety load
[e]FG = future growth loads

The City must also identify an assessment plan to monitor progress as well as targeted controls as a part of the SWMP. Targeted controls are BMPs with measurable goals focused specifically on bacteria as the pollutant of concern.

2.2 IMPAIRMENT FOR BACTERIA

Specific Requirements as stated in the General Permit, *Part III.A.5*, for Level 2a small MS4s:

Italicized and quoted text indicates direct quotes from the TPDES General Permit.

"Since the POC is bacteria, the permittee shall implement BMPs addressing each of the below areas, as applicable, in the SWMP and implement as appropriate. If a TMDL I-Plan is available, the permittee must do one of the following: (1) refer to the I-Plan for appropriate BMPs, or (2) implement alternative equivalent BMPs. Table 1 in the General Permit includes the appropriate alternative equivalent BMPs to implement for item (2) above or when a TMDL I-Plan is not available. Where BMPs included in the TMDL I-Plan for item (1) above are completed or where the I-Plan does not address all the below areas, the permittee shall refer to Table 1 in the general permit for the appropriate BMPs to implement so that each of the areas below are addressed, as applicable.

The SWMP and annual report must include the selected BMPs. Permittees may not exclude BMPs associated with the minimum control measures (MCMs) required under 40 CFR § 122.34 from their list of BMPs."

Table 9 outlines these BMPs for bacteria impairment.

3. BMPs, Measurable Goals, and Implementation Schedule

The City is required to participate in minimum control measure (MCM) 1 through MCM 6. MCM 7 only applies to Level 4 small MS4s so this MCM does not apply to the City due to being a Level 2a operator. The City has the option of participating in MCM 8, authorization for construction activities where the small MS4 is the site operator. The City has elected not to participate in MCM 8.

The SWMP also sets measurable goals and provides a schedule for the implementation of the BMPs. Implementation of the selected BMPs is expected to result in reductions of pollutants discharged into the City of University Park's waterways. The six required MCMs are:

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

Specific requirements of each MCM for Level 2 Small MS4s are provided below. Following the listing of MCM requirements, tables are provided that list the BMPs for each MCM, along with a description of the BMP and its measurable goals and implementation schedule in Table 3 through Table 8.

3.1 MCM 1 - PUBLIC EDUCATION AND OUTREACH

Specific Requirements as stated in the General Permit, *Part IV.D.1*, for Level 2a small MS4s:

"(a) The small MS4 operator shall implement a public education and outreach program to distribute educational materials to the community and conduct equivalent outreach about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff.

(1) The public education and outreach program shall at a minimum include the following target audiences, as applicable:

a. Traditional MS4s and counties shall address the residents being served;

b. Non-traditional MS4s (other than counties) shall address the community served by the MS4 as listed below:

(i) Universities shall target the faculty, other staff, and students;

(ii) Military bases shall target military personnel (and dependents), and employees (including contractors);

(iii) Prison complexes or other multi-building complexes shall target staff and contractors;

(iv) Municipal Utility Districts and other special districts shall target residents served, staff, and contractors; and

(v) Transportation authorities shall address staff, contractors, and users.

c. Small MS4 operators shall address additional target audiences within the small MS4 service area (such as but not limited to, those listed in Table 2) as listed below:

(i) Levels 1, 2a, and 2b: No requirement for additional audiences;

(ii) Level 3: A minimum of one additional audience; or

(iii) Level 4: A minimum of two additional audiences."

MCM 1 Public Education and Outreach Target Audience(s):

The following are the target audience(s) the City of University Park has identified:

- Residents being served in the community

"(2) Small MS4 operators shall target specific pollutant(s) in the permittee's education program (such as, but not limited to, those listed in Table 3). Each small MS4 shall have a minimum of one target pollutant for each target audience from Part IV.D.1(a)(1).a-c of this permit. Small MS4s may implement more than one target pollutant where desired or appropriate to address pollutants in stormwater discharges to the MEP. The target pollutant must be appropriate for the target audience. The same pollutant may be used for more than one target audience and the target pollutant(s) may change annually as needed."

MCM 1 Public Education and Outreach Target Pollutants:

The following are the target pollutants the City has identified:

- Fertilizer and pesticides
- Grass clippings and leaf litter
- Pet waste

"(3) Small MS4 operators must use appropriate educational resources as BMPs (materials, events, activities, etc.) in conjunction with the selected pollutants for the selected audiences. The message delivered by these BMPs must be applicable to the target audience and relate to the target pollutant (such as a newsletter article about updated illegal dumping and discharge ordinances distributed to auto mechanic businesses or a hazardous household waste disposal flyer when applying for trash or recycling services). BMPs which are ongoing throughout the year or permit term may be counted as one annual BMP. Permittees shall explain how each BMP relates to the target pollutant and target audience. Small MS4 operators may change BMPs during the permit cycle if determined appropriate through annual reviews and a different BMP may be more effective for the small MS4's target pollutant or target audience. Any changes shall be reflected in the SWMP and explained in the annual report.

a. If the permittee has a public website, the permittee shall post its SWMP and the annual reports required under Part V.B.2 or a summary of the annual report on the permittee's website.

(i) The SWMP must be posted no later than 30 days after the NOI or NOC approval date; and

(ii) The annual report no later than 30 days after the due date.

b. Over the permit term, small MS4 operators shall implement a minimum number of public education and outreach BMPs from Table 4, as follows:

(i) Level 1: three BMPs;

(ii) Levels 2a and 2b: four BMPs; or

(iii) Levels 3 and 4: five BMPs.

c. Small MS4 operators shall create/host or support the public education and outreach BMP(s) in Part IV.D.1.(a)(3) and Table 4. To be considered support given to the coordinating groups, the small MS4 operator shall at minimum conduct at least one of the following or similar:

(i) Plan, or assist with planning, the distribution of materials;

(ii) Coordinate volunteers;

(iii) Contribute supplies, materials, tools, or equipment;

(iv) Provide assistance from MS4 staff to distribute the materials; or

(v) Provide financial support.

d. Small MS4 operators may partner with other MS4 operators to maximize the program and cost effectiveness of the required outreach."

Public Education and Outreach Selected BMPs:

The City of University Park has selected the following four BMPs in this section due to being a level 2a operator plus one additional BMP due to bacteria impairment:

- Information on the MS4 operator's website
- Social media posts, social media campaign
- Maintain or mark storm drains and inlets with, "No Dumping – Drains to Creek" or similar message
- Publish articles in local newspaper or newsletter, may be electronic
- Fact sheets/brochures/utility bill inserts/door hangers

The BMP description, responsibility, implementation schedule, and measurable goals for these BMPs are in Table 3.

3.2 MCM 2 - PUBLIC INVOLVEMENT / PARTICIPATION

Specific Requirements as stated in the General Permit, *Part IV.D.2*, for Level 2a small MS4s:

"All permittees, except prisons/correctional facilities, shall involve the public, and, at minimum, comply with any state and local public notice requirements in the planning and implementation

activities related to developing and implementing the SWMP. The small MS4 operator must create opportunities, or support activities that are coordinated by citizen groups, for residents and others to become involved with the SWMP. The activities/BMPs must demonstrate an impact on stormwater runoff by improving water quality.

(a) Over the permit term, small MS4 operators shall implement a minimum number of public involvement/participation activities and measurable goals from Table 5 as follows:

(1) Level 1 small MS4: two BMPs;

(2) Levels 2a and 2b small MS4: three BMPs; or

(3) Levels 3 and 4 small MS4: four BMP

(b) Small MS4 operators shall create/host or support the public involvement/participation BMP(s) in Part IV.D.2.(a) and Table 5. To be considered support given to the coordinating groups the small MS4 operator shall at minimum conduct at least one of the following or similar:

(1) Plan, or assist with planning, the event or activity;

(2) Contribute supplies, materials, tools, or equipment;

(3) Provide assistance from MS4 staff during the activity;

(4) Provide assistance with recruiting volunteers for events;

(5) Make a space available for projects, meetings, or events;

(6) Advertisement for the events;

(7) Supply disposal services;

(8) Arrange land or stream access;

(9) Provide financial support; or

(10) Provide donations of goods and services such as food.

(c) Small MS4 operators may partner with other MS4 operators to maximize the program and cost effectiveness of the required public involvement/participation activities."

Public Involvement / Participation Selected BMPs:

The City of University Park was able to select the following three BMPs in this section due to being a level 2a operator:

- MS4 area-wide stormwater survey for input on program implementation
- Educational display/booth at a school, public event, or similar event to provide information or displays that work to improve public understanding of issues related to water quality
- Public meeting for input on the program implementation such as a city council meeting, board meeting, or stakeholder meeting

The BMP description, responsibility, implementation schedule, and measurable goals for these BMPs are in Table 4.

3.3 MCM 3 - ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE)

Specific Requirements as stated in the General Permit, *Part IV.D.3*, for Level 2a small MS4s:

"(a) Program Development

(1) All permittees shall develop, implement, and enforce a program to investigate, detect, and eliminate illicit discharges into the small MS4. The program must include a plan to detect and address non-stormwater discharges, including illegal dumping to the small MS4.

The Illicit Discharge Detection and Elimination (IDDE) program must include the following:

a. A current and accurate MS4 map (see Part IV.D.3.(c)(1);

b. Methods for informing and training MS4 field staff (see Part IV.D.3.(c)(2));

c. Methods for facilitating public reporting of illicit discharges and illegal dumping (see Part IV.D.3.(c)(3));

d. Procedures for responding to illicit discharge, illegal dumping, and spills (see Part IV.D.3.(c)(4));

e. Procedures for tracing the source of an illicit discharge and illegal dumping (see Part IV. D.3.(c)(5));

f. Procedures for removing the source of the illicit discharge and illegal dumping (see Part IV.D.3.(c)(5));

g. Conduct inspections in response to complaints including follow-up inspections, and procedures for inspections (see Part IV.D.3.(c)(6));

h. For Levels 2, 3 and 4, if applicable, procedures to prevent and correct any leaking on-site sewage disposal systems that discharge into the small MS4;

i. For Level 4, procedures for identifying priority areas within the small MS4 likely to have illicit discharges and illegal dumping, and a list of all such areas identified in the small MS4 (see Part IV.D.3.(e)(1));

j. For Level 4, dry weather field screening to detect illicit discharges and illegal dumping (see Part IV.D.3.(e)(2)); and

k. For Level 4, procedures to reduce the discharge of floatables in the small MS4 (see Part IV.D.3.(e)(3)).

(2) For non-traditional small MS4s, if illicit connections, illegal dumping, or illicit discharges are observed related to another operator's MS4, the permittee shall notify the other MS4 operator within 48 hours of discovery. If notification to the other MS4 operator

is not practicable, then the permittee shall notify the appropriate TCEQ Regional Office of the possible illicit connection, illegal dumping, or illicit discharge.

(3) If another MS4 operator notifies the permittee of an illegal connection, illegal dumping, or illicit discharge to the small MS4, then the permittee shall follow the requirements specified in Part IV.D.3.(c)(5).

(b) Allowable Non-Stormwater Discharges Non-stormwater discharges listed in Part II.D do not need to be considered by the permittee as an illicit discharge requiring elimination unless the permittee or the TCEQ identifies the discharge as a significant source of pollutants to the small MS4.

(c) Requirements for All Permittees All permittees shall meet all the following requirements, including Table 6.

(1) MS4 Mapping

All permittees shall maintain a current and accurate MS4 map, which must be located on site and available for review by TCEQ. The MS4 map must show at a minimum the following information:

a. The location of all small MS4 outfalls that are operated by the permittee and that discharge into Waters of the U.S.;

b. The location and name of all surface waters receiving discharges from the small MS4 outfalls; and

c. Priority areas identified under Part IV.D.3.(e)(1), if applicable.

(2) Education and Training

All permittees shall implement a method for informing or training all the permittee's field staff that may come into contact with or otherwise observe an illicit discharge, illegal dumping, or illicit connection to the small MS4 as part of their normal job responsibilities. Training program materials and attendance lists must be maintained onsite and made available for review by the TCEQ.

(3) Public Reporting of Illicit Discharges and Spills

All permittees shall publicize and facilitate public reporting of illicit discharges, illegal dumping, or water quality impacts associated with discharges into or from the small MS4. The permittee shall provide a central contact point to receive reports; for example, by including a telephone number for complaints and spill reporting.

(4) All permittees shall develop and maintain onsite procedures for responding to illicit discharges, illegal dumping, and spills.

(5) Source Investigation and Elimination

a. Minimum Investigation Requirements – Upon becoming aware of an illicit discharge or illegal dumping, all permittees shall conduct an investigation to

identify and locate the source of such illicit discharge or illegal dumping as soon as practicable.

(i) All permittees shall prioritize the investigation of discharges based on their relative risk of pollution. For example, sanitary sewage may be considered a high priority discharge.

(ii) All permittees shall report to the TCEQ immediately upon becoming aware of the occurrence of any illicit flows believed to be an immediate threat to human health or the environment.

(iii) All permittees shall track all investigations and document, at a minimum, the date(s) the illicit discharge or illegal dumping was observed; the results of the investigation; any follow-up of the investigation; and the date the investigation was closed.

b. Identification and Investigation of the Source of the Illicit Discharge

All permittees shall investigate and document the source of illicit discharges and illegal dumping where the permittees have jurisdiction to complete such an investigation. If the source of illicit discharge or illegal dumping extends outside the permittee's boundary, all permittees shall notify the adjacent permitted MS4 operator or the appropriate TCEQ Regional Office.

c. Corrective Action to Eliminate Illicit Discharge

If and when the source of the illicit discharge or illegal dumping has been determined, all permittees shall immediately notify the responsible party of the problem and shall require the responsible party to perform all necessary corrective actions to eliminate the illicit discharge and illegal dumping.

(6) Inspections - The permittee shall conduct inspections, in response to complaints, and shall conduct follow-up inspections to ensure that corrective measures have been implemented by the responsible party.

The permittee shall develop written procedures describing the basis for conducting inspections in response to complaints and conducting follow-up inspections."

Illicit Discharge Detection and Elimination Required BMPs:

The City of University Park must implement the following required BMPs for level 2a operators:

- Maintain a current and accurate MS4 map as described in *Part IV.D.3.(c)(1)*
- Conduct training for all the permittee's field staff as described in *Part IV.D.3.(c)(2)*
- Maintain and publicize a public reporting method for the public to report illicit discharges, illegal dumping, or water quality impacts associated with discharges into or from the small MS4 such as a reporting hotline, online form, or other similar mechanism as described in *Part IV.D.3.(c)(3)*
- Develop and maintain procedures for responding to illicit discharges, illegal dumping, and spills as described in *Part IV.D.3.(c)(4)*

- Source investigation and elimination of illicit discharges and illegal dumping as described in *Part IV.D.3.(c)(5)*
- Corrective action to eliminate illicit discharges and illegal dumping as described in *Part IV.D.3.(c)(5)*
- Inspection Procedures as described in *Part IV.D.3.(c)(6)*
- Inspections in response to complaints as described in *Part IV.D.3.(c)(6)*

The BMP description, responsibility, implementation schedule, and measurable goals for these BMPs are in Table 5.

3.4 MCM 4 - CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

Specific Requirements as stated in the General Permit, *Part IV.D.4*, for Level 2a small MS4s:

"(a) Requirements and Control Measures

All permittees shall develop, implement, and enforce a program requiring operators of small and large construction activities to select, install, implement, and maintain stormwater control measures that prevent illicit discharges to the MEP. The program must include the development and implementation of an ordinance or other regulatory mechanism, as well as sanctions to ensure compliance to the extent allowable under state, federal, and local law, to require erosion and sediment control.

If TCEQ waives requirements for stormwater discharges associated with small construction from a specific site(s), the permittee is not required to enforce the program to reduce pollutant discharges from such site(s).

(b) Requirements for All Permittees

All permittees shall meet the following requirements including Table 9.

> *(1) All permittees shall require that construction site operators implement appropriate erosion and sediment control BMPs. The permittee's construction program must ensure erosion and sediment controls, soil stabilization, and BMP requirements are effectively implemented for all small and large construction activities discharging to its small MS4 consistent with the TPDES CGP, TXR150000.*
>
> *(2) Prohibited Discharges - The following discharges are prohibited:*
>
> > *a. Wastewater from washout of concrete and wastewater from water well drilling operations, unless managed by an appropriate control;*
> >
> > *b. Wastewater from washout and cleanout of stucco, paint, from release oils, and other construction materials;*
> >
> > *c. Fuels, oils, or other pollutants used in vehicle and equipment operation and maintenance;*
> >
> > *d. Soaps or solvents used in vehicle and equipment washing; and*

e. Discharges from dewatering activities, including discharges from dewatering of trenches and excavations, unless managed by appropriate BMPs.

(3) Construction Plan Review Procedures

To the extent allowable by state, federal, and local law, all permittees shall maintain and implement site plan review procedures that describe which plans will be reviewed as well as when an operator may begin construction. For those permittees without legal authority to enforce site plan reviews, this requirement is limited to those sites operated by the permittee and its contractors and located within the permittee's regulated area. The site plan procedures must meet the following minimum requirements:

a. The site plan review procedures must incorporate consideration of potential water quality impacts.

b. The permittee may not approve any plans unless the plans contain appropriate site-specific construction site control measures that, at a minimum, meet the requirements described in the TPDES CGP, TXR150000.

The permittee may require and accept a plan, such as a stormwater pollution prevention plan (SWP3), that has been developed pursuant to the TPDES CGP, TXR150000.

(4) Construction Site Inspections and Enforcement

To the extent allowable by state, federal, and local law, all permittees shall implement procedures for inspecting large and small construction projects. Permittees without legal authority to inspect construction sites shall at a minimum conduct inspection of sites operated by the permittee or its contractors and that are located in the permittee's regulated area.

a. The permittee shall conduct inspections based on the evaluation of factors that are a threat to water quality, such as: soil erosion potential; site slope; project size and type; sensitivity of receiving water bodies; proximity to receiving water bodies; non-stormwater discharges; and past record of non-compliance by the operators of the construction site.

b. Inspections must occur during the active construction phase.

(i) All permittees shall develop and implement updated written procedures outlining the inspection and enforcement requirements. These procedures must be maintained on-site or in the SWMP and be made available to TCEQ.

(ii) Inspections of construction sites must, at a minimum:

1. Determine whether the site has appropriate coverage under the TPDES CGP, TXR150000. If no coverage exists, notify the permittee of the need for permit coverage;

2. Conduct a site inspection to determine if control measures have been selected, installed, implemented, and maintained according to the small MS4's requirements;

3. Assess compliance with the permittee's ordinances and other regulations; and

4. Provide a written or electronic inspection report.

c. Based on site inspection findings, all permittees shall take all necessary follow-up actions (for example, follow-up-inspections or enforcement) to ensure compliance with permit requirements and the SWMP. These follow-up and enforcement actions must be tracked and documentation maintained for review by the TCEQ.

For non-traditional small MS4s with no enforcement powers, the permittee shall notify the adjacent MS4 operator with enforcement authority or the appropriate TCEQ Regional Office.

(5) Information Submitted By the Public

All permittees shall develop, implement, and maintain procedures for receipt and consideration of information submitted by the public.

(6) MS4 Staff Training

All permittees shall ensure that all staff whose primary job duties are related to implementing the construction stormwater program (including permitting, plan review, construction site inspections, and enforcement) are informed or trained to conduct these activities. The training may be conducted by the permittee or by outside trainers."

Construction Site Stormwater Runoff Control BMPs:

The City of University Park must implement the following required BMPs for level 2a operators:

- Develop and maintain an ordinance or other regulatory mechanism as described in *Part IV.D.4.(a)*
- Prohibit discharges as described in *Part IV.D.4.(b)(2)*
- Maintain and implement site plan review procedures that describe which plans will be reviewed as well as when an operator may begin construction as described in *Part IV.D.4.(b)(3)*
- Implement procedures for inspecting large and small construction projects as described in *Part IV.D.4.(b)(4)*
- Conduct construction site inspections as described in *Part IV.D.4.(b)(4)*
- Develop, implement, and maintain procedures for receipt and consideration of information submitted by the public as described in *Part IV.D.4.(b)(5)*
- Conduct training for all the MS4 staff whose primary job duties are related to implementing the construction stormwater program as described in *Part IV.D.4.(b)(6)*

The BMP description, responsibility, implementation schedule, and measurable goals for these BMPs are in Table 6.

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

Specific Requirements as stated in the General Permit, *Part IV.D.5*, for Level 2a small MS4s:

"(a) Post-Construction Stormwater Management Program

All permittees shall meet the requirements below including Table 11.

> *(1) All permittees shall 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, including projects that disturb less than one acre that are part of a larger common plan of development or sale. The program must be established for private and public development sites. The program may utilize an offsite mitigation and payment in lieu of components to address this requirement.*
>
> *(2) All permittees shall use, to the extent allowable under state, federal, and local law and local development standards, an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects. The permittees shall establish, implement, and enforce a requirement that owners or operators of new development and redeveloped sites design, install, implement, and maintain a combination of structural and non-structural BMPs appropriate for the community and that protects water quality. If the construction of permanent structures is not feasible due to space limitations, health and safety concerns, cost effectiveness, or highway construction codes, the permittee may propose an alternative approach to TCEQ.*

(b) Requirements for All Permittees

All permittees shall meet all the following requirements including Table 11.

> *(1) All permittees shall document and maintain records of enforcement actions and make them available for review by the TCEQ.*
>
> *(2) Long-Term Maintenance of Post-Construction Stormwater Control Measures*
>
> *All permittees shall, to the extent allowable under state, federal, and local law, ensure the long-term operation and maintenance of structural stormwater control measures installed through one or both of the following approaches:*
>
> > *a. Maintenance performed by the permittee. (See Part IV.D.6)*
> >
> > *b. Maintenance performed by the owner or operator of a new development or redeveloped site under a maintenance plan. The maintenance plan must be filed in the real property records of the county in which the property is located. The permittee shall require the owner or operator of any new development or redeveloped site to develop and implement a maintenance plan addressing maintenance requirement for any structural control measures installed on site. The permittee shall require operation and maintenance performed is documented*

and retained on site, such as at the offices of the owner or operator and made available for review by the small MS4."

Post Construction Stormwater Management in New Development and Redevelopment BMPs:

The City of University Park must implement the following required BMPs for level 2a operators:

- Develop and maintain an ordinance or other regulatory mechanism as described in *Part IV.D.5.(a)(2)*
- Document and maintain records of enforcement actions and make them available for review by the TCEQ as described in *Part IV.D.5.(b)(1)*
- Ensure the long term operation and maintenance of structural stormwater control measures installed as described in *Part IV.D.5.(b)(2)*

The BMP description, responsibility, implementation schedule, and measurable goals for these BMPs are in Table 7.

3.6 MCM 6 - POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

Specific Requirements as stated in the General Permit, *Part IV.D.6*, for Level 2a small MS4s:

"(a) Program Development

All permittees shall develop and implement an operation and maintenance program (O&M), including an employee training component that has the ultimate goal of preventing or reducing pollutant runoff from municipal activities and municipally owned areas including but not limited to: park and open space maintenance; street, road, or highway maintenance; fleet and building maintenance; stormwater system maintenance; new construction and land disturbances; municipal parking lots; vehicle and equipment maintenance and storage yards; waste transfer stations; and salt/sand storage locations.

(b) Requirements for All Permittees

All permittees shall meet the requirements described below including Table 13.

(1) Permittee-owned Facilities and Control Inventory

All permittees shall develop and maintain an inventory of facilities and stormwater controls that it owns and operates within the regulated area of the small MS4. The inventory must include all applicable permit numbers, registration numbers, and authorizations for each facility or controls. The inventory must be available for review by TCEQ and must include, but is not limited, to the following, as applicable:

a. Composting facilities;

b. Equipment storage and maintenance facilities;

c. Fuel storage facilities;

d. Hazardous waste disposal facilities;

e. Hazardous waste handling and transfer facilities;

f. Incinerators;

g. Landfills;

h. Materials storage yards;

i. Pesticide storage facilities;

j. Buildings, including schools, libraries, police stations, fire stations, and office buildings;

k. Parking lots;

l. Golf courses;

m. Swimming pools;

n. Public works yards;

o. Recycling facilities;

p. Salt storage facilities;

q. Solid waste handling and transfer facilities;

r. Street repair and maintenance sites;

s. Vehicle storage and maintenance yards; and

t. Structural stormwater controls.

(2) Training and Education

All permittees shall inform or train appropriate employees involved in implementing pollution prevention and good housekeeping practices. All permittees shall maintain a training attendance list for review by TCEQ when requested.

(3) Disposal of Waste Material – Waste materials removed from the small MS4 must be disposed of in accordance with 30 TAC Chapters 330 or 335, as applicable.

(4) Contractor Requirements and Oversight

a. Any contractors hired by the permittee to perform maintenance activities on permittee-owned facilities must be 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).

b. All permittees shall provide oversight of contractor activities to ensure that contractors are using appropriate control measures and SOPs. Oversight procedures must be maintained on-site and made available for inspection by TCEQ.

(5) Municipal Operation and Maintenance Activities

a. Assessment of permittee-owned operations

All permittees shall evaluate operation and maintenance (O&M) activities for their potential to discharge pollutants in stormwater, including but not limited to:

(i) Road and parking lot maintenance, including such areas as pothole repair, pavement marking, sealing, and re-paving;

(ii) Bridge maintenance, including such areas as re-chipping, grinding, and saw cutting;

(iii) Cold weather operations, including plowing, sanding, and application of deicing and anti-icing compounds and maintenance of snow disposal areas; and

(iv) Right-of-way maintenance, including mowing, herbicide and pesticide application, and planting vegetation.

b. All permittees shall identify pollutants of concern that could be discharged from the above O&M activities (for example, metals; chlorides; hydrocarbons such as benzene, toluene, ethyl benzene, and xylenes; sediment; and trash).

c. All permittees shall develop and implement a set of pollution prevention measures that will reduce the discharge of pollutants in stormwater from the above activities. These pollution prevention measures must include at least two the following:

(i) Replacing materials and chemicals with more environmentally friendly materials or methods;

(ii) Tracking application of deicing and anti-icing compounds;

(iii) Using suspended tarps, booms, or vacuums to capture paint, solvents, rust, paint chips and other pollutants generated by regular bridge maintenance; and

(iv) Placing barriers around or conducting runoff away from deicing chemical storage areas to prevent discharge into surface waters.

d. Inspection of pollution prevention measures - All pollution prevention measures implemented at permittee-owned facilities must be visually inspected to ensure they are working properly. The permittee shall develop written procedures that describes frequency of inspections occurring at least one time annually and how they will be conducted. A log of inspections must be maintained and made available for review by the TCEQ upon request.

(6) Structural Control Maintenance

If BMPs include structural controls, maintenance of the controls must be performed by the permittee and consistent with maintaining the effectiveness of the BMP. The

permittee shall develop written procedures that define the frequency of inspections occurring at least one time annually and how they will be conducted."

Pollution Prevention and Good Housekeeping for Municipal Operations BMPs:

The City of University Park must implement the following required BMPs for level 2a operators:

- Permittee-owned Facilities and Control Inventory as described by *Part IV.D.6.(b)(1)*
- Training and Education as described in *Part IV.D.6.(b)(2)*
- Disposal of Waste Material as described in *Part IV.D.6.(b)(3)*
- Contractor Requirements and Oversight as described in *Part IV.D.6.(b)(4)*
- Assessment of permittee-owned operations as described in *Part IV.D.6.(b)(5)a*
- Identify pollutants of concern as described in *Part IV.D.6.(b)(5)b*
- Pollution Prevention Measures as described in *Part IV.D.6.(b)(5)c*
- Inspection of Pollution Prevention Measures as described in *Part IV.D.6.(b)(5)d*
- Structural Control Maintenance as described by *Part IV.D.6.(b)(6)*

The BMP description, responsibility, implementation schedule, and measurable goals for these BMPs are in Table 8.

Unless otherwise specified, tasks will be completed by December 31st of each year listed in the Implementation Schedule.

Table 3 - Minimum Control Measure 1: Public Education and Outreach

Best Management Practices	BMP Description	Responsibility	Implementation Schedule	Measurable Goals
Information on the MS4 operator's website.	Maintain a stormwater page on the City's website. The web page will include stormwater education in general per the TCEQ general permit guidelines. The web page will also provide specific information regarding the City's TPDES Phase II program, and may include educational and participatory opportunities, and links to other local, state, and national stormwater websites.	Public Works	December 2025 (and then annually)	Maintain a webpage with current and accurate information working links. • All links shall be checked, and the page shall be updated as necessary 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.	Continue to place storm drain markers on local storm drains in an effort to increase awareness and to prevent dumping into the storm drain system.	Public Works	December 2025 (and then annually)	• Placard, stencil, or paint a minimum of 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 MS4 operator or impairment watersheds within the MS4 area each year.

Best Management Practices	BMP Description	Responsibility	Implementation Schedule	Measurable Goals
Publish articles in local newspaper or newsletter, may be electronic.	Distribute educational material to residents via City newsletters. The articles will include stormwater education per the TCEQ general permit guidelines and will cover topics such as fertilizer, herbicide, and pesticide usage in lawn and garden care, proper disposal of household hazardous waste and oils, pet waste management, water conservation, illicit discharges, illegal dumping and discharge ordinances, how to report improper actions through the hotline or the City's web page, and / or other educational and participatory opportunities.	Community Information Officer	December 2025 (and then annually)	• Develop article topics that are group specific and address activities or pollutants of concern at a seasonally appropriate time. • A minimum of two articles must be published or emailed to target audience groups each year.
Social media posts, social media campaign.	The City will post four times, once a quarter, annually on the City's social media page. These posts will be related to ways residents can minimize or avoid adverse stormwater impacts or practices to improve the quality of stormwater runoff.	Communications and social media team	December 2025 (and then annually)	Post a minimum of four times each year on a minimum of one social media platform. • 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. • Must make a minimum of one post per quarter and all quarterly posts must be visible by attendees for the full year, each year.

Best Management Practices	BMP Description	Responsibility	Implementation Schedule	Measurable Goals
Fact sheets/brochures/ utility bill inserts/door hangers.	Distribute educational material to residents via utility bill inserts. The inserts will include stormwater education per the TCEQ general permit guidelines. The inserts will also provide information on topics such as information specifically relating to fertilizer, herbicide, and pesticide usage in lawn and garden care, proper disposal of household hazardous waste and oils, pet waste management, water conservation, illicit discharges, illegal dumping and discharge ordinances, how to report improper actions through the hotline or the City's web page, and other educational and participatory opportunities.	Community Information Officer	December 2025 (and then annually)	• Develop material topics that are group specific and address activities or pollutants of concern. • Fact sheets, brochures, bill inserts, door hangers, or handouts shall be distributed each year for at least 75% of the intended audience. • Develop and implement a tracking system to estimate what percentage of the intended audience is reached for determining BMP effectiveness.

Table 4 - Minimum Control Measure 2: Public Involvement/Participation

Best Management Practices	BMP Description	Responsibility	Implementation Schedule	Measurable Goals
MS4 area-wide stormwater survey for input on program implementation.	The City will develop and distribute an MS4 area-wide stormwater survey for input on program implementation and will track the estimated percentage of the audience reached.	Public Works	December 2025 (and then annually)	• Provide or support a minimum of one 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 for determining BMP effectiveness.
Educational display/booth at a school, public event, or similar event to provide information or displays that work to improve public understanding of issues related to water quality.	The City will have an educational display/booth at public event, such as a 4th of July event or Christmas event. This display/booth put on from the City will improve public understanding of issues related to water quality.	Public Works	December 2025 (and then annually)	• Provide or support one booth or display at minimum annually. • The booth or display must be staffed during the time which the event is open to the public.

Public meeting for input on the program implementation such as a city council meeting, board meeting, or stakeholder meeting.	Conduct public meetings to present on the City's stormwater management program and solicit feedback. This will be conducted during a City Council meeting, board meeting, or stakeholder meeting.	Public Works	December 2025 (and then annually)	• Host or support a minimum of one meeting annually for input on the program implementation to be advertised to at least 75% of the intended audience. • Develop and implement a tracking system to estimate what percentage of the intended audience is reached for determining BMP effectiveness.

Table 5 - Minimum Control Measure 3: Illicit Discharge Detection and Elimination (IDDE)

Best Management Practices	BMP Description	Responsibility	Implementation Schedule	Measurable Goals
Maintain a current and accurate MS4 map as described in Part IV.D.3.(c)(1).	Maintain the map of the City, showing the location of the City outfalls and storm sewer system components as well as names and locations of surface waters receiving discharges from the City.	Public Works	December 2025 (and then annually)	• Review and update, as necessary, at least one time annually to include features which have been added, removed, or changed.
Conduct training for all the permittee's field staff as described in Part IV.D.3.(c)(2). Training may be conducted in person or using self-paced training materials such as videos or reading	The City will provide illicit discharge detection and elimination training to field staff so the staff is able to identify an illicit discharge, illegal dumping, or illicit connection to the small MS4.	Public Works, Community Development	December 2025 (and then annually)	• Conduct a minimum of one training annually 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 small MS4 as part of their normal job responsibilities.

materials.				
Maintain and publicize a public reporting method for the public to report illicit discharges, illegal dumping, or water quality impacts associated with discharges into or from the small MS4 such as a reporting hotline, online form, or other similar mechanism as described in Part IV.D.3.(c)(3).	The City currently maintains a 311 hotline for citizens to report illicit discharges, illegal dumping, or water quality impacts associated with discharges into or from the small MS4. Service Requests may also be submitted online. As part of the public information program, the City will track calls and service requests related to stormwater issues. The City will inform residents that they can report stormwater complaints, potential violations, and other stormwater issues by calling 311 or submitting a service request through the City's CRM through the overall public information effort.	Public Works, 311	December 2025 (and then annually)	• Maintain a minimum of one public reporting mechanism 100% of the time during the permit term. • 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. • In addition, if the MS4 operator has a public website, the public reporting mechanism must be publicized 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 as described in Part IV.D.3.(c)(4).	The City will develop and maintain procedures for responding to illicit discharges, illegal dumping, and spills. These procedures will be assessed annually, and the City will document any changes or improvements made.	Public Works	December 2025 (and then annually)	• Review and update the procedures at least one time annually to address changes and make improvements to the established procedures where applicable.

Source investigation and elimination of illicit discharges and illegal dumping as described in Part IV.D.3.(c)(5).	The City will conduct investigations to determine the source of illicit discharges and illegal dumping activities for 100% of incidents, high priority discharges, illicit discharges, and illegal dumping incidents. The City will also contact TCEQ for 100% of any illicit flows investigated that pose a threat to health and safety.	Public Works	December 2025 (and then annually)	• Respond to 100% of known illicit discharges and illegal dumping incidents each year to investigate sources (or some Level 2b MS4s must notify the appropriate agency with the authority to act). • Respond to 100% of high priority discharges each year, such as sanitary sewer discharges within 24 hours (or some Level 2b MS4s must notify the appropriate agency with the authority to act). • 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 as described in Part IV.D.3.(c)(5).	The City will take corrective action against illicit discharges and illegal dumping as needed. Enforcement can also be aided by the City's existing ordinances such as pool design, litter, liquid waste management, control of grass clippings, grease and grit trap waste, right-of-way erosion, and prohibited discharge standards.	Community Development, Public Works, Sanitation, Police	December 2025 (and then annually)	• 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 as described in Part IV.D.3.(c)(6).	The City will maintain procedures and update annually as needed to best detect illicit discharges and illegal dumping.	Public Works	December 2025 (and then annually)	• 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 as described in Part IV.D.3.(c)(6).	The City will conduct inspections to determine the source of illicit discharges and illegal dumping activities. Inspections will be performed for 100% of the complaints via the hotline or other methods complaints may be received such as a service request, email or in person.	Public Works	December 2025 (and then annually)	• Conduct inspections in response to 100% of complaints each year according to the established procedures (or some Level 2b MS4s must notify the appropriate agency with the authority to act). • Conduct follow up inspections in 100% of cases each year where necessary as described in the established procedures (except for some Level 2b MS4s without the appropriate authority to act).

Table 6 - Minimum Control Measure 4: Construction Site Stormwater Runoff Control

Best Management Practices	BMP Description	Responsibility	Implementation Schedule	Measurable Goals
Develop and maintain an ordinance or other regulatory mechanism as described in Part IV.D.4.(a).	The City of University Park has existing requirements for construction site one acre and greater (including larger common plan). Existing ordinances address stormwater runoff from construction sites and prohibits illicit discharges such as wash out and other pollutants. The City has also adopted iSWM which addresses material and waste controls from construction sites. A City ordinance also requires a stormwater pollution prevention plan in accordance with the TPDES Construction General Permit TXR150000.	Legal, Community Development	By December 2028	• Review and update the ordinance or other regulatory mechanism at least one time during the permit term to address changes and make improvements to the ordinance where applicable.
Prohibit discharges as described in Part IV.D.4.(b)(2).	Existing ordinances address stormwater runoff from construction sites and prohibits illicit discharges such as wash out and other pollutants.	Public Works	By December 2028	• Develop and maintain an ordinance or other regulatory mechanism to prohibit these discharges. • Review and update the ordinance or other regulatory mechanism at least one time during the permit term to address changes and make improvements to the ordinance where applicable.

Maintain and implement site plan review procedures that describe which plans will be reviewed as well as when an operator may begin construction as described in Part IV.D.4.(b)(3).	The City of University Park requires a SWPPP for construction sites in excess of one (1) acre, and a procedure for review of each SWPPP is developed and utilized. The review process utilizes a checklist to ensure each SWPPP contains the required information per the TPDES CGP, TXR150000.	Public Works, Community Development	December 2025 (and then annually)	• 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 site plan review procedures for 100% of new construction site plans received each year.
Implement procedures for inspecting large and small construction projects as described in Part IV.D.4.(b)(4).	The City of University Park has a program for review of stormwater controls on construction sites one (1) acre or larger.	Public Works, Community Development	December 2025 (and then annually)	• 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 as described in Part IV.D.4.(b)(4).	The City of University Park has an existing construction site inspection program. The City requires an inspection for all construction that requires a permit. The inspection program includes erosion and sediment controls and construction site waste management, including portable toilet facilities, in order to mitigate possible bacteria discharge from construction sites. The City also has current licensing requirements for portable toilet	Engineering, Planning, Community Development	December 2025 (and then annually)	• Conduct inspections at a minimum of 80% of active construction sites annually according to the established procedures (or some Level 2b small MS4s must notify the appropriate agency with the authority to act). • Each year, conduct follow up inspections in 100% of cases where necessary as described in the established procedures (except for some Level 2b small

	vendors. Additional inspections are performed on construction sites one (1) acre in size or larger. These inspections focus on the installation and function of stormwater controls and stormwater inspections as required by the SWPPP.			MS4s without the appropriate authority to act).
Develop, implement, and maintain procedures for receipt and consideration of information submitted by the public as described in Part IV.D.4.(b)(5).	Continue to implement the program for the receipt and consideration of public comments regarding construction site stormwater runoff control.	Public Works, Community Information Officer	December 2025 (and then annually)	• 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. • Maintain one webpage, hotline, or similar method for receipt of information submitted by the public throughout the permit term.
Conduct training for all the MS4 staff whose primary job duties are related to implementing the construction stormwater program as described in Part IV.D.4.(b)(6). Training may be conducted in person or using	Continue training City of University Park staff for controlling construction site runoff.	Public Works	December 2025 (and then annually)	• Conduct a minimum of one training annually for 100% of MS4 staff whose primary job duties are related to implementing the construction stormwater program.

self-paced training materials such as videos or reading materials.				

Table 7 - Minimum Control Measure 5: Post Construction Stormwater Management in New Development and Redevelopment

Best Management Practices	BMP Description	Responsibility	Implementation Schedule	Measurable Goals
Develop and maintain an ordinance or other regulatory mechanism as described in Part IV.D.5.(a)(2).	Continue to utilize the City's existing land use plan and existing development ordinances. The City will review existing codes and ordinances and revise as necessary to address the discharge of bacteria, nutrients, and other substances that could contribute to bacterial growth in the environment. Water restrictions will be considered that would reduce runoff and pollutants. The City has also adopted the iSWM manual and developed a stormwater ordinance in order to set controls in place to address runoff, include the use of structural and/or non-structural BMPs, and regulate discharges from new development and redevelopment activities of one acre and greater (including larger common plan).	Public Works, Legal, Community Development	By December 2028	• Review and update the ordinance or other regulatory mechanism at least one time during the permit term to address changes and make improvements to the ordinance where applicable.
Document and maintain records of enforcement actions and make them available for review by the TCEQ as described in Part IV.D.5.(b)(1).	Continue to implement and enforce post construction stormwater management requirements that owners or operators of new development and redeveloped sites design, install, implement, and maintain a combination of structural and non-structural BMPs appropriate for the community that protect water quality. Program addresses	Community Development, Public Works, Police	December 2025 (and then annually)	• Maintain records of 100% of enforcement actions taken each year. • Make 100% of enforcement records available to TCEQ for review within 24 hours of request.

Best Management Practices	BMP Description	Responsibility	Implementation Schedule	Measurable Goals
	stormwater runoff from new development and redeveloped sites that discharge into the small MS4 that disturb one acre or more, including projects that disturb less than one acre that are part of a larger common plan of development or sale.			
Ensure the long term operation and maintenance of structural stormwater control measures installed as described in Part IV.D.5.(b)(2).	Continue implementation of a long-term operation and maintenance review program for post-construction BMPs.	Public Works, Community Development	December 2025 (and then annually)	• Each year, implement a maintenance plan and schedule established by the small MS4 operator addressing 100% of stormwater control measures where the small MS4 operator is responsible for maintenance. • Each year, require 100% of the owners or operators of any new development or redeveloped sites to develop and implement a maintenance plan addressing maintenance requirement for any structural control measures installed on site. • Require the site owner or operators to maintain documentation, such as a tracking log, onsite of 100% of the maintenance performed and made available for review by the small MS4 operator or TCEQ within 24 hours of the request.

Table 8 - Minimum Control Measure 6: Pollution Prevention and Good Housekeeping for Municipal Operations

Best Management Practices	BMP Description	Responsibility	Implementation Schedule	Measurable Goals
Permittee-owned Facilities and Control Inventory as described by Part IV.D.6.(b)(1).	Continue to maintain an inventory of the City's facilities, stormwater controls, and structural controls.	Public Works	December 2025 (and then annually)	• 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 as described in Part IV.D.6.(b)(2). Training may be conducted in person or using self-paced training materials such as videos or reading materials.	Continue good housekeeping and pollution prevention training for municipal operations to existing employee training programs for the Public Works Department.	Public Works	December 2025 (and then annually)	• Conduct a minimum of one training annually for 100% of employees involved in implementing pollution prevention and good housekeeping practices. • 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 as described in Part IV.D.6.(b)(3).	The City will properly dispose of 100% of their waste material in accordance with 30 TAC Chapters 330 or 335, annually.	Public Works	December 2025 (and then annually)	• Ensure that 100% of waste from the MS4 is disposed of in accordance with 30 TAC Chapters 330 or 335, as applicable each year.

Best Management Practices	BMP Description	Responsibility	Implementation Schedule	Measurable Goals
Contractor Requirements and Oversight as described in Part IV.D.6.(b)(4).	Contractors hired by the City are required to comply with all of the stormwater control measures, good housekeeping practices, and City operating procedures.	Public Works	December 2025 (and then annually)	• Each year, 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 described in Parts IV D.6.(b)(2)-(6). • Implement oversight procedures of contractor activities in 100% of contracts to ensure that contractors are using appropriate control measures and 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.
Assessment of permittee-owned operations as described in Part IV.D.6.(b)(5)a.	Continue the existing operation and maintenance (O&M) program, including the employee training component, to reduce/prevent pollution from municipal activities and municipally owned areas. Update program as needed. Evaluate O&M activities for their potential to discharge pollutants in stormwater.	Public Works	December 2025 (and then annually)	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;

Best Management Practices	BMP Description	Responsibility	Implementation Schedule	Measurable Goals
				• 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.
Identify pollutants of concern as described in Part IV.D.6.(b)(5)b.	The City will identify and evaluate pollutants of concern that could be discharged from O&M activities and maintain a list of 100% of the pollutants identified.	Public Works	December 2025 (and then annually)	• 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, ethyl benzene, 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 as described in	The City will develop and implement a set of pollution prevention measures to reduce discharge of pollutants in	Public Works	December 2025 (and then annually)	Develop and implement a set of pollution prevention measures that will reduce the discharge of pollutants in

Best Management Practices	BMP Description	Responsibility	Implementation Schedule	Measurable Goals
Part IV.D.6.(b)(5)c.	stormwater from permittee-owned operations. The City will track all applications and amounts of deicing and anti-icing compounds used in the MS4 areas. The City will also place barriers around or conduct runoff away from 100% of deicing chemical storage areas to prevent discharge from getting into surface water.			stormwater from the permittee-owned operations. Implement at least two of the following pollution prevention measures (**bold** indicates selected 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.**
Inspection of Pollution Prevention Measures as described in	The City will develop inspection procedures for pollution prevention measures at permittee-owned facilities. The frequency of these inspections will also be	Public Works	December 2025 (and then annually)	• At least one time annually, visually inspect 100% of pollution prevention measures implemented at permittee-owned

Best Management Practices	BMP Description	Responsibility	Implementation Schedule	Measurable Goals
Part IV.D.6.(b)(5)d.	depicted in these procedures. The City will review these procedures annually and update as needed. A log will also be created to track 100% of the inspections conducted annually.			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 as described by Part IV.D.6.(b)(6).	The City will develop inspection procedures for structure control maintenance. These inspections will take place according to the plan and schedule developed by the City. The City will also review these procedures annually and update as needed.	Public Works	December 2025 (and then annually)	• 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

Best Management Practices	BMP Description	Responsibility	Implementation Schedule	Measurable Goals
				one time annually to address changes or additions to the pollution prevention measures.

Table 9 – Bacteria Impaired Water Bodies BMPs

Best Management Practices	BMP Description	Responsibility	Implementation Schedule	Measurable Goals
Sanitary Sewer Systems as described by Part III.A.5.(a).	The City will review 100% of the sanitary sewer system in the MS4 area within the impairment watershed and identify areas of improvement. Also, the City will continue to track and investigate the number of sanitary sewer overflows that occur yearly within the City. The City currently does not have any lift stations in their MS4 area so no inspections will be conducted, but if that changes over the permit term they will then conduct inspections going forward.	Public Works	December 2025 (and then annually)	• Conduct a review of 100% of the sanitary sewer system in the MS4 area within the impairment watershed to identify areas for improvement within the first two years of the permit term. Initiate all feasible improvement projects by the end of the permit term. • Conduct weekly lift station inspections at 100% of the MS4 owned and operated lift stations in the MS4 area within the impairment watershed each year. • Investigate and address 100% of sanitary sewer overflow complaints identified through the public reporting mechanism implemented by the MS4 each year. • Strengthen sanitary sewer use requirements to reduce blockage from fats, oils, and grease by reviewing and updating ordinances or other regulatory mechanisms and inspection programs at least one time annually.

On Site Sewage Facilities (OSSFs) as described by Part III.A.5.(b).	The City currently does not have OSSFs in their MS4 boundary and will not be able to carry out this BMP. However, if any OSSFs are added within the MS4 boundary during the permit term the City will then implement and follow the measurable goals outlined in the permit.	Public Works	December 2025 (and then annually)	Develop and implement procedures to screen 20% of the MS4 area within the impairment watershed annually to identify failing OSSFs. • Maintain an inventory of 100% of the identified OSSFs and their status each year. o Review and update this inventory at least one time each year to address changes or additions. • Address 100% of failing OSSFs each year by requiring the responsible party to perform all necessary corrective actions to eliminate the illicit discharge. Investigate and address 100% of OSSF complaints identified through the public reporting mechanism implemented by the MS4 each year.
Illicit Discharges and Dumping as described by Part III.A.5.(c).	The City will address discharges that contribute bacteria. The City will follow all procedures and ordinances for BMPs established in MCM3.	Public Works, Community Development	December 2025 (and then annually)	• Ensure 100% of procedures and ordinances or other regulatory mechanisms established for BMPs in MCM 3: Illicit Discharge Detection and Elimination address discharges that may contribute bacteria including from OSSFs, grease traps, and grit traps.

Animal Sources as described by Part III.A.5.(d).	The City currently provides pet waste management stations throughout City parks. Residents are responsible for proper disposal of their pet's waste by ordinance. The City will continue to maintain at least one pet stations in 100% of public parks or similar greenspaces in the MS4 area.	Public Works, Parks	December 2025 (and then annually)	Implement at least one of the following (**bold** indicates selected measures): • **Provide and maintain at least one pet waste station in 100% of public parks or similar greenspaces in the MS4 area within the impairment watershed each year.** • Assess and address, if feasible, 100% of complaints received about feral hogs in the MS4 area within the impairment watershed each year. If infeasible to address the complaint, maintain documentation of the reason. Prohibit the feeding of ducks and geese in 100% of public parks or similar greenspaces the MS4 area within the impairment watershed each year. • Develop and distribute educational materials related to animal sources of bacteria to 75% of the intended audiences identified by the MS4 in MCM 1: Public Education and Outreach each year. Develop and implement a tracking system to estimate what percentage of the intended audience is reached for determining BMP effectiveness.

Residential Education as described by Part III.A.5.(e).	Only one additional Public Education and Outreach BMP required for bacterial impairment. This additional BMP is added in Table 3.	Public Works	December 2025 (and then annually)	Implement at least one additional BMP from MCM 1: Public Education and Outreach and Table 4 annually (e.g., a Level 1 small MS4 operator must implement at least four total BMPs under MCM 1 each year in the permit cycle instead of the three BMPs required by Part IV.D.1.(a)3.b). In addition, ensure at least one of the BMPs implemented for MCM 1: Public Education and Outreach focuses on at least one of the following: • Bacteria discharging from a residential site either during runoff events or directly; • Fats, oils, and grease clogging sanitary sewer lines and resulting overflows; • Identifying and reporting illicit discharges or illegal dumping; • Maintenance and operation of decorative ponds; and • Proper disposal of pet waste.

4. Allowable Non-Stormwater Discharges

Specific Requirements as stated in the General Permit, *Part II.D*, for Level 2a small MS4s:

"The following non-stormwater sources may be discharged from the small MS4 and are not required to be addressed in the small MS4's Illicit Discharge and Detection or other minimum control measures, unless they are determined by the permittee or TCEQ to be significant contributors of pollutants to the small MS4, or they are otherwise prohibited by the MS4 operator:

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 wastewater;*
15. *Discharges or flows from emergency fire-fighting activities (emergency fire-fighting activities do not include washing of trucks, runoff water from training activities, test water from fire suppression systems, and similar activities);*
16. *Other allowable non-stormwater discharges listed in 40 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."*

5. Recordkeeping and Reporting

5.1 RECORDKEEPING

Specific Requirements as stated in the General Permit, *Part V.A*, for Level 2a small MS4s:

1. *"The permittee shall retain all records, a copy of this TPDES general permit (maintained physically or electronically), and records of all data used to complete the application (NOI) for this general permit, for a period of at least three years, or for the remainder of*

the term of this general permit, whichever is longer. This period may be extended by request of the executive director at any time.

2. *The permittee shall submit the records to the executive director only when specifically asked to do so. The SWMP required by this general permit must be retained at a location accessible to the TCEQ for review upon request.*
3. *The permittee shall make the NOI and the SWMP available to the public at reasonable times during regular business hours, if requested to do so in writing. Copies of the SWMP must be made available within ten working days of receipt of a written request. Other records must be provided in accordance with the Texas Public Information Act. However, all requests for records from federal facilities must be made in accordance with the Freedom of Information Act.*
4. *The period during which records are required to be kept shall be automatically extended to the date of the final disposition of any administrative or judicial enforcement action that may be instituted against the permittee."*

5.2 GENERAL REPORTING REQUIREMENTS

Specific Requirements as stated in the General Permit, *Part V.B.1*, for Level 2a small MS4s:

"(a) Noncompliance Notification

According to 30 TAC § 305.125(9), any noncompliance which may endanger human health or safety, or the environment, must be reported by the permittee to the TCEQ.

Report of such information must be provided orally or by fax to the TCEQ Regional Office within 24 hours of becoming aware of the noncompliance. A written report must be provided by the permittee to the appropriate TCEQ Regional Office and to the TCEQ Enforcement Division (MC-224) within five working days of becoming aware of the noncompliance. The written report must contain:

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

(b) Other Information

When the permittee becomes aware that it either submitted incorrect information or failed to submit complete and accurate information requested in an NOI, NOT, NOC, Option 1 Waiver, Option 2 Waiver, or any other report, the permittee shall promptly submit the facts or information to the executive director."

5.3 ANNUAL REPORT

Specific Requirements as stated in the General Permit, *Part V.B.2*, for Level 2a small MS4s:

"The small MS4 operator shall submit a concise annual report to the executive director by March 31st of each year for the previous calendar year.

The first annual report for this general permit shall address the period beginning on the day that authorization is obtained and ending on December 31 of that same year.

The small MS4 operator shall make a copy of the annual report readily available for review by TCEQ personnel upon request.

The annual report must include:

(a) The status of the compliance with permit conditions, an assessment of the appropriateness of the identified activities/BMPs, progress towards achieving the statutory goal of reducing the discharge of pollutants to the MEP, the measurable goals for each of the MCMs, and an evaluation of the success of the implementation of the measurable goals;
(b) A summary of the results of information collected and analyzed, during the reporting period, including monitoring data used to assess the success of the program at reducing the discharge of pollutants to the MEP;
(c) If applicable for receiving water bodies, a summary of any activities taken to address the discharge to impaired water bodies, including a summary of the small MS4s BMPs used to address the pollutant of concern, and if sampling was conducted include the sampling results;
(d) A summary of the stormwater activities the small MS4 operator plans to undertake during the next reporting year;
(e) Proposed changes to the SWMP, including changes to any activities/BMPs or any identified measurable goals that apply to the program elements;
(f) A description and schedule for implementation of additional activities/BMP's that may be necessary, based on monitoring results, to ensure compliance with applicable TMDLs and implementation plans. For water bodies that are listed as impaired after discharge authorization pursuant to Part III., include a list of such water bodies and the pollutant(s) causing the impairment, and a summary of any actions taken to comply with the requirements of Part III.;
(g) Notice that the small MS4 operator is relying on another government entity to satisfy some of its permit obligations (if applicable);
(h) The number of construction activities where the small MS4 is the operator and authorized under the optional 8th MCM, including the total number of acres disturbed; and
(i) The number of construction activities that occurred within the jurisdictional area of the small MS4 (as noticed to the permittee by the construction operator), and that were not authorized under the optional 8th MCM.

Small MS4s authorized under the 2019 TPDES Small MS4 General Permit must prepare an annual report whether or not the NOI has been approved by the TCEQ. If the permittee has either not implemented the SWMP or not begun to implement the SWMP because it has not received approval of the NOI, then the annual report may include that information.

The annual report must be signed (in accordance with 30 TAC § 305.128 relating to Signatories to Reports) and submitted using the online electronic reporting system, NeT-MS4, available through the TCEQ website unless the permittee requests and obtains an Electronic Reporting Waiver."

6. Appendices

APPENDIX A
Notice of Intent (NOI) Application

City of University Park

Stormwater Management Program

AVO 58592

APPENDIX B
General Permit TXR040000

City of University Park

Stormwater Management Program

AVO 58592

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APPENDIX C
Storm Drain Map

City of University Park

Stormwater Management Program

AVO 58592