



# Stormwater Management Permitting and Compliance Update

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# Outline

- Background on Stormwater & State Permitting
- Highlights of FY2024 Compliance Activities
- Updates in the New General Permit for Small MS4s
- General Permit Requirements
- Next Steps
- Questions & Feedback

# Background

Our Municipal Separate Storm Sewer System (MS4) is the network of channels, curbs, ditches, and storm drains that helps convey rainfall runoff to reduce flash flooding. Stormwater flows directly to streams, rivers, and lakes without being treated.



The Texas Commission on Environmental Quality (TCEQ) has maintained a General Permit for Small MS4s since 2007. The General Permit standardizes the criteria for MS4 operators to **minimize the amount of pollution being discharged with stormwater runoff.**

# Background

Traditional small MS4s are categorized by the size of the population they serve.

- Level 1: Population of less than 10,000
- Level 2: Population of at least 10,000 but less than 40,000
- **Level 3: Population of at least 40,000 but less than 100,000 ← *City of Burleson***
- Level 4: Population of at least 100,000

Every 5-year permit cycle, the state's requirements increase in scope. Our FY2024 stormwater compliance activities were based on the 2019 General Permit requirements. Compliance activities for 2025 through 2029 will be based on the new (current) General Permit requirements.

# Highlights of FY2024 Activities

- **Business Education:** “Compactor Tips” flyers delivered and discussed in-person with managers at grocery stores with trash compactors.
- **Public Education:** “DIY Composting” class presented at Russell Farm on 5/11/2024. City staff participated in the NCTCOG Public Education Task Force.
- **Street Sweeping:** 1,435 lane miles swept.



- **Clean-Ups:** The 2024 Spring & Fall Trash Bash had a combined total of 737 volunteers and collected an estimated 11,055 pounds of litter.
- **Adopt-A-Spot:** During FY2024, we had 7 active Adopt-A-Spot groups that conducted a total of 34 cleanups.

# Highlights of FY2024 Activities

- **Employee Training:** 39 new field staff completed our online stormwater training course.
- **Illegal Dumping:** 311 Customer Service representatives fielded a total of 38 illegal dumping complaints.
- **Construction Site Inspections:** City inspectors conducted 1,476 construction site inspections. 247 warnings were issued. 10 Notices of Violation were issued.
- **Social Media:** Communications posted 28 stormwater-related Facebook posts in FY2024. (*“Stormwater Tip of the Month,” HHW collection Event, Trash Bash, Fall Recycling Event, etc.*)



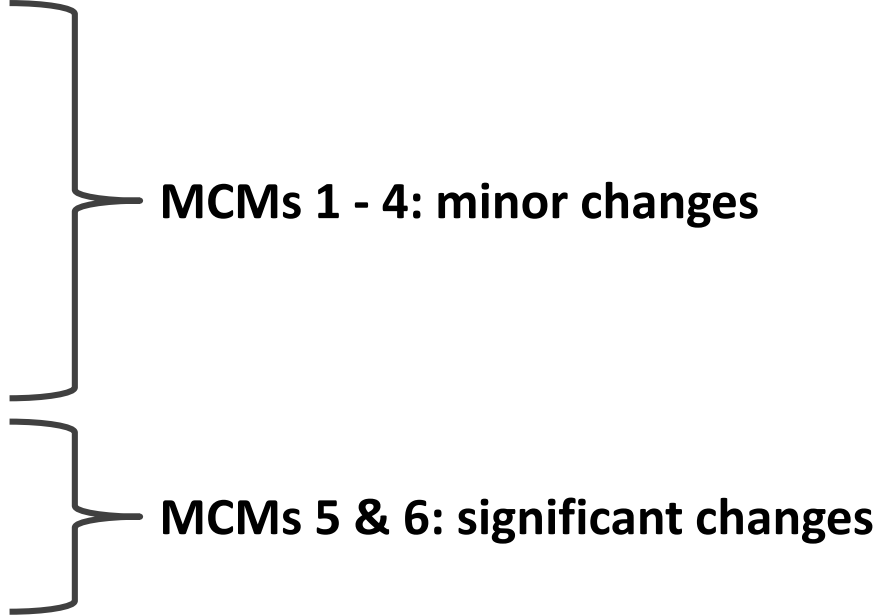
# New General Permit Updates

## Noteworthy Changes with the new General Permit:

- Application, approval, and annual reporting will be **online**.
- All small MS4s will be moving to a **calendar-year reporting period**.
- MS4 operators now choose from a pre-approved set of Best Management Practices (BMPs) for the “Public Education & Outreach” and “Public Involvement & Participation” requirements.
- Requirements for “Pollution Prevention & Good Housekeeping” at City facilities have expanded significantly (*from 8 BMPs on the 2019 Permit to 22 BMPs on the 2024 General Permit*).

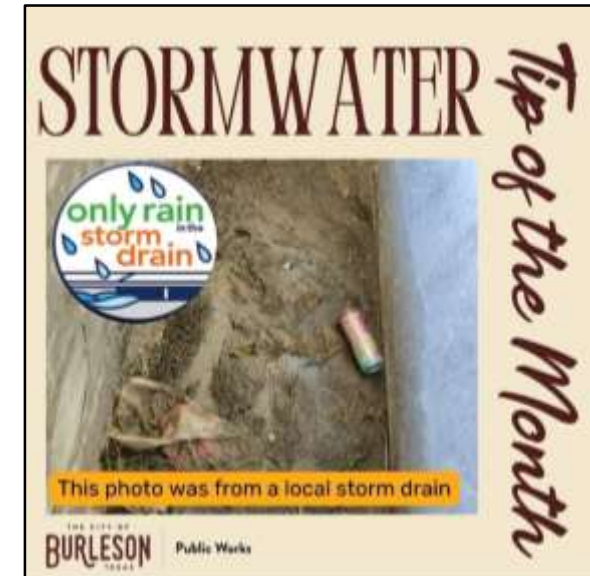
# Minimum Control Measures

## New Phase II MS4 General Permit

- MCM 1: Public Education & Outreach
  - MCM 2: Public Involvement & Participation
  - MCM 3: Illicit Discharge Detection & Elimination (IDDE)
  - MCM 4: Construction
  - MCM 5: Post-Construction
  - MCM 6: Pollution Prevention & Good Housekeeping
  - MCM 7: Industrial Stormwater Sources *(Not applicable - only required for Level 4 MS4s)*
  - MCM 8: Authorization for Construction Activities *(Optional)*
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- MCMs 1 - 4: minor changes
- MCMs 5 & 6: significant changes

# MCM 1: Public Education & Outreach

- **1.1 Stormwater Webpage:** Maintain a stormwater webpage with current and accurate information and working links.
- **1.2 Social Media:** Post a minimum of four times each year (once per quarter) on social media.
- **1.3 City Newsletter:** Publish or email a minimum of two stormwater articles each year.
- **1.4 Educational Materials:** Distribute educational materials such as fact sheets, brochures, bill inserts, door hangers, or handouts each year to address specific activities or pollutants of concern.
- **1.5 Educational Trainings:** Hold, host, or promote a minimum of two events annually that address ways attendees can minimize adverse impacts to stormwater.
- **1.6 Targeted Education Campaign:** Distribute targeted educational materials via mail, email, or in-person



# MCM 2: Public Involvement & Participation



- **2.1 Clean-up Events:** Host at least two litter clean-up events annually.
  - *Spring & Fall Trash Bash – Tentatively scheduled for 4/5/2025 & 9/20/2025.*
- **2.2 Educational Display:** Have at least one display annually at a public event to help improve public understanding of water quality issues.
  - *City Fest 2/6/2025, Civic Academy 2/13/2025, etc.*
- **2.3 Training Event:** Hold at least one event annually to train residents on stormwater-related topics such as building rain barrels, fertilizer application training, recognizing illicit discharges, etc.
  - *Working with TRWD. “Gardening for Stormwater: Raingardens and Beyond” class is scheduled for 4/12/2025.*
- **2.4 Stormwater Speaker Series:** Provide two stormwater-related speaker events annually.
  - *Working with TRWD. “Tough Texas Lawn Care” scheduled for 5/17/2025. “DIY Sprinkler Repair” scheduled for 5/31/2025. Topical to stormwater issues due to water conservation and lawn chemical run-off.*

# MCM 3: Illicit Discharge Detection & Elimination (IDDE)

- **3.1 Storm System Map:** Maintain a current and accurate MS4 map. Review and update annually.
- **3.2 Field Staff Training:** Conduct annual stormwater training for 100% of field staff that may come into contact with illicit discharges as part of their normal job duties.
  - *Our field staff are an excellent early warning system when they spot something that doesn't look right.*
- **3.3 Public Reporting:** Maintain a public reporting method for illicit discharges and illegal dumping.
  - 311
- **3.4 IDDE Procedures:** Develop and maintain procedures for responding to illicit discharges and illegal dumping.



# MCM 3: Illicit Discharge Detection & Elimination (IDDE)



- **3.5 Source Investigation:** Identify and locate source of illicit discharges. Respond to high priority discharges such as sanitary sewer discharges within 24 hours.
- **3.6 Corrective Action:** If and when the source has been determined, notify responsible party and require the responsible party to perform necessary corrective actions to eliminate the illicit discharge.
- **3.7 Inspection Procedures:** Review and update IDDE inspection procedures annually to address changes and make improvements where applicable
- **3.8 IDDE Complaints:** Conduct inspections in response to 100% of IDDE complaints.
- **3.9 Follow-Up Investigations:** Conduct follow-up inspections where necessary to verify that the discharge has been eliminated.

# MCM 3: Illicit Discharge Detection & Elimination (IDDE)

- **3.10 Sanitary Sewer Overflows (SSOs):** Review 100% of the sanitary sewer system in the MS4 to identify areas for improvement within the first two years of the permit term. Inspect 100% of City-owned lift stations weekly. Investigate and address 100% of SSO complaints.

- *Department: Public Works - Wastewater*

- **3.11 On-Site Sewage Facilities (OSSFs):** Maintain an inventory of 100% of identified OSSFs and their status each year. Address 100% of failing OSSFs each year by requiring the responsible party to perform necessary corrective actions to eliminate the illicit discharge. Investigate 100% of OSSF complaints.



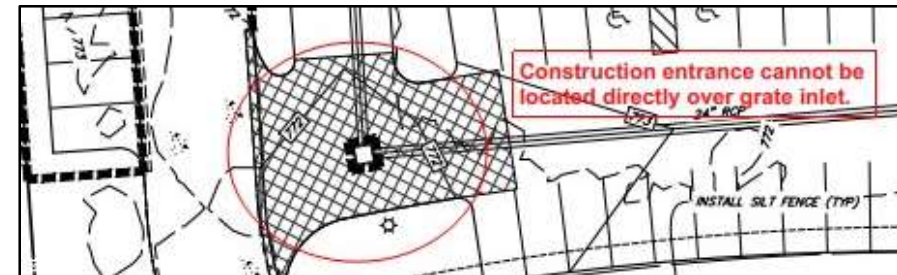
- *Department: Development Services*

- **3.12 Animal Sources:** Develop and distribute educational materials related to animal sources of bacteria.

- *Departments: Community Services - Animal Services, Public Works - Environmental*

# MCM 4: Construction Sites

- **4.1 Construction Ordinance:** Review construction ordinance at least once during permit term and update where applicable.
  - § 82, Article IV, “Stormwater Pollution Control”
- **4.2 Prohibited Discharges:** Maintain an ordinance to prohibit discharges as described in Part IV.D.4.(b)(2) of the General Permit. Review at least once during permit term and update where applicable.
  - § 82-166, “Specific prohibitions and requirements”
- **4.3 Plan Review:** Maintain and implement construction site plan review procedures.
- **4.4 Inspection Procedures:** Implement procedures for inspecting large and small construction projects.



# MCM 4: Construction Sites



- **4.5 Construction Site Inspections:** Conduct construction site inspections as described in the General Permit.
- **4.6 Receipt of Information Submitted by the Public:** Maintain a webpage, hotline, or similar method throughout the permit term for receipt of information submitted by the public.
  - *311*
- **4.7 Stormwater Inspector Training:** Conduct annual training for stormwater inspectors.
  - *Engineering Inspectors & Environmental Inspector*
- **4.8 Construction Site Inventory:** Maintain an annual inventory of TPDES permitted public and private construction sites within the MS4.

# MCM 5: Post-Construction Stormwater Management

- **5.1 Post-Construction Ordinance:** Review post-construction ordinance at least once during permit term and update where applicable.
  - *Appendix A, Article 6, “Subdivision and Development: Drainage and Environmental Standards”*
- **5.2 Enforcement Action:** Document and maintain records of enforcement actions.
- **5.3 Maintenance Requirements:** Ensure the long term operation and maintenance of structural stormwater control measures. Require 100% of the owners or operators of any *new* development to implement a maintenance plan addressing maintenance requirements for any structural control measures installed on site.



# MCM 6: Pollution Prevention & Good Housekeeping

- **6.1 Inventory of Municipal Facilities:** Develop and maintain an annual inventory for 100% of municipal facilities and pollution controls.
- **6.2 Employee Training:** Conduct a minimum of one training annually for 100% of employees involved in implementing pollution prevention and good housekeeping practices.
- **6.3 Waste Disposal:** Ensure that 100% of City solid waste and hazardous waste material is disposed of appropriately (as described in the General Permit and 30 TAC Chapters 330/335).
- **6.4 City Contractors:** Ensure that 100% of contractors hired by the City of Burleson comply with stormwater control measures and good housekeeping practices. Implement oversight procedures.



# MCM 6: Pollution Prevention & Good Housekeeping



- **6.5 Operation and Maintenance Activities:** Evaluate 100% of operation and maintenance activities annually for their potential to discharge pollutants in stormwater.
- **6.6 Pollutants of Concern:** Identify pollutants of concern that could be discharged from City operations, such as metals, chlorides, hydrocarbons, sediment, and trash.
- **6.7 Pollution Prevention Measures:** Develop and implement a set of pollution prevention measures that will reduce the discharge of pollutants in stormwater from City operations. Track 100% of the application of deicing compounds in the City each year.
- **6.8 Self-Inspections:** Annually inspect 100% of pollution prevention measures implemented at City-owned facilities to ensure they are working properly. Develop and maintain inspection procedures and inspection logs.
- **6.9 Structural Controls:** Develop and maintain written procedures that define the frequency of inspections and maintenance on City-owned structural controls.

# MCM 6: Pollution Prevention & Good Housekeeping

- **6.10 MS4 Maintenance Program:** Develop and implement an operation and maintenance program of the MS4 to reduce to the maximum extent practicable the collection of pollutants.
  - **Inspect at least 25% of City-owned detention basins annually.**
  - **Inspect at least 20% of City-owned stormwater inlets annually.**
- **6.11 Problem Areas:** Develop a list of potential problem areas for increased inspection (such as areas with recurrent illegal dumping).
- **6.12 Street Sweeping:** Where feasible, sweep at least 75% of the streets annually and 100% of streets at least twice by the end of the permit term.
- **6.13 Facility Map:** Maintain a map of City-owned facilities and stormwater controls. Review and update annually.
- **6.14 Facility Review:** Review all City facilities at least once per permit term for their potential to discharge pollutants.
- **6.15 High Priority Facilities:** Identify high priority facilities that have a high potential to generate stormwater pollutants. Review and update the list annually.
- **6.16 Facility Assessments:** Document the results of all self-inspection assessments described in BMP 6.8 and maintain copies of the site evaluation checklists, deficiencies identified, and corrective actions taken.



# MCM 6: Pollution Prevention & Good Housekeeping

- **6.17 Facility SOPs:** Develop facility-specific stormwater management SOPs for City owned facilities. A description of the BMPs developed to comply with good housekeeping must be included in each facility-specific SOP. Review and update annually.
- **6.18 Material Storage:** Shelter 100% of materials with potential to contribute to stormwater pollution (fertilizers, solvents, paints, automotive fluids, etc.)
- **6.19 De-icing Materials:** Store de-icing materials in a manner that prevents exposure to stormwater.
- **6.20 Spill Prevention:** Develop and implement SOPs that address spill prevention at City vehicle maintenance and fueling facilities.
- **6.21 Equipment and Vehicle Washing:** Develop and implement SOPs that address equipment and vehicle washing activities at City facilities.
- **6.22 Inspection Program:** Develop and implement an inspection program which must include 100% of high priority City facilities at least once per year. Document 100% of the inspections and observations.

# Minimum Control Measures 7 & 8

## ➤ MCM 7: Industrial Stormwater Sources

This MCM only applies to Level 4 small MS4s (population of at least 100,000). While Burleson is not required to implement this MCM, the Water division of Public Works conducts wastewater pre-treatment testing at industrial facilities to monitor for pollutants.



## ➤ MCM 8: Authorization for Construction Activities

This MCM is optional, and the City of Burleson will not be implementing this MCM.

# Next Steps – Addressing the Big Changes

- **Year 1 Annual Report:** covers calendar year 2025 and is due March 31, 2026.  
Every annual report provides an opportunity for us to adjust our goals and BMPs based on feedback and recommendations from Council and City Management.
- **BMPs 3.3, 3.4, & 6.11: Illegal Dumping**  
Increase focus on illegal dumping abatement and prevention. Strengthen inter-departmental cooperation. (*Police, Public Works, Parks, and Development Services*)
- **BMP 5.3: Long-term Maintenance of Stormwater Controls**  
Incorporate long-term maintenance requirements into our civil plan review process.
- **MCM 6: Pollution Prevention and Good Housekeeping**  
Coordinate with the different City departments to identify opportunities to improve chemical storage and good housekeeping practices at City facilities.

# Questions / Feedback?

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