

## Phase II (Small) MS4 Annual Report Form

**TPDES General Permit Number TXR040000**

### A. General Information

Authorization Number: TXR040547

Reporting Year: 6

Annual Reporting Year Option Selected by MS4:

Calendar Year: 12/31

Permit Year: \_\_\_\_\_

Fiscal Year: \_\_\_\_\_ Last day of fiscal year: (\_\_\_\_)

Reporting period beginning date: (month/date/year) 01/01/2024

Reporting period end date: (month/date/year) 12/31/2024

MS4 Operator Level: Level 1 Name of MS4: City of Lucas MS4

Contact Name: Patrick Hubbard Telephone Number: 972-912-1209

Mailing Address: 665 Country Club Road, Lucas, TX 75002

E-mail Address: phubbard@lucastexas.us

A copy of the annual report was submitted to the TCEQ Region: YES

Region the annual report was submitted to: TCEQ Region 4

### B. Status of Compliance with the MS4 GP and SWMP

1. Provide information on the status of complying with permit conditions:  
(TXR040000 Part IV.B.2)

|                                                                                              | Yes | No | Explain |
|----------------------------------------------------------------------------------------------|-----|----|---------|
| Permittee is currently in compliance with the SWMP as submitted to and approved by the TCEQ. | YES |    |         |
| Permittee is currently in compliance with recordkeeping and reporting requirements.          | YES |    |         |

|                                                                                                                                              |     |  |  |
|----------------------------------------------------------------------------------------------------------------------------------------------|-----|--|--|
| Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.). | YES |  |  |
| Permittee conducted an annual review of its SWMP in conjunction with preparation of the annual report                                        | YES |  |  |

2. Provide a general assessment of the appropriateness of the selected BMPs. You may use the table below to meet this requirement (**see Example 1 in instructions**):

| <b>MCM(s)</b>                          | <b>BMP</b>            | <b>BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)</b>                                                                                               |
|----------------------------------------|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1: Public Education & Outreach         | Waste Cleanup         | Yes, the annual waste cleanup in Lucas improves public awareness of the importance of pollution elimination. The event provides opportunity for exposure of the businesses and public to natural conservancy. |
| 2: IDDE                                | MS4 Staff Training    | Yes, MS4 staff is trained on the MS4 duties and methods to ensure compliance to the MEP.                                                                                                                      |
| 2: IDDE                                | Storm Sewer Map       | Yes, MS4 staff uses the storm sewer map. Keeping this map updated for changes to the system is important.                                                                                                     |
| 3: Construction Site SW Runoff Control | Plan Review           | Yes, continuing reviews of erosion runoff controls on construction sites is necessary to reduce pollution potential.                                                                                          |
| 4: Post Construction SW Management     | Management Agreements | Yes, ordinances and standards requiring maintenance of privately owned conveyance & controls ensures functionality of the systems.                                                                            |
| 5: Good Housekeeping O&M               | Self-Assessment       | Yes, evaluation of routine activities and City assets will uncover City's potential pollution sources that can be reduced.                                                                                    |
| 6: Legal Authority                     | Ordinance Adoption    | Yes, Enforcement powers are necessary to halt pollution sources.                                                                                                                                              |

3. Describe progress towards achieving the goal of reducing the discharge of pollutants to the MEP. If no progress was made or the BMP did not result in a reduction in pollutants, provide an explanation. Use the table below to meet this requirement (**see Example 2 in instructions**):

| <b>MCM</b> | <b>BMP</b>                       | <b>Information Used</b>   | <b>Quantity</b> | <b>Units</b>        | <b>Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)</b>       |
|------------|----------------------------------|---------------------------|-----------------|---------------------|--------------------------------------------------------------------------------------------------------|
| 1          | 1: Public Education & Outreach   | Stormwater Flyers         | 2,800           | Flyers              | Yes, Information to public enhances pollution precaution.                                              |
| 1          | 5: Waste Cleanup                 | Weight of Collected waste | 2,000           | Pounds              | Yes, the collected waste was removed from the MS4.                                                     |
| 3          | 13: Construction Site Inspection | Construction Sites        | 218             | Site Inspections    | Yes, assuring that the contractors install appropriate BMP control measures reduces erosion in runoff. |
| 2,3,4      | 18: Legal Authority              | Local SWMP Ordinance      | 4               | Enforcement Actions | Yes, the ordinance provides the City with authority to enforce BMP's to protect stormwater quality     |

4. Provide the measurable goals for each of the MCMs, and an evaluation of the success of the implementation of the measurable goals (**see Example 3 in instructions**):

| <b>MCM(s)</b> | <b>Measurable Goal(s)</b>                                | <b>Explain progress toward goal or how goal was achieved.<br/>If goal was not accomplished, please explain.</b>                                 |
|---------------|----------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|
| 1             | (1) Distribute Stormwater Flyers to City Account Holders | Goal Met – Account holders were provided informational stormwater flyer with annual newsletter in Year 6. Approximately 2,800 Flyers were sent. |
| 1             | (2) City Employee Training                               | Goal Met – One Stormwater training video was emailed to all City employees in Year 6.                                                           |
| 2,3           | (3) MS4 Staff Training                                   | Goal Met – IDDE training was provided to MS4 staff via online training video.                                                                   |
| 5             | (4) O&M Personnel Training                               | Goal Met – Training of O&M personnel was provided in Year 6.                                                                                    |
| 1             | (5) Waste Cleanup                                        | Goal Met – A public involvement trash collection event was successfully organized by the City; resulting in 2,000 pounds of trash collected.    |
| 1             | (6) Post SWMP on Website & Public Notice                 | Goal Met – Lucas' SWMP and the Year 5 (2023) Annual Report are posted on City's website.                                                        |
| 1             | (7) Website Education                                    | Goal Met – Lucas' website includes a stormwater education page which includes a video and links to resources.                                   |
| 1,2           | (8) Public Stormwater Reporting                          | Goal Met – Reporting tool is on the City's website, however there were no reports made in Year 6 (2024).                                        |
| 2             | (9) IDDE Program Summary                                 | Goal Met – Spill Response Plan is Managed by Lucas Fire Rescue Department.                                                                      |
| 2             | (10) IDDE Enforcement                                    | Goal Met – Reported incidents of trash/debris or dumping were resolved by Code Enforcement or Public Works as applicable.                       |

|       |                                                          |                                                                                                                                                            |
|-------|----------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2     | (11) Storm Sewer Map                                     | Goal Met – Stormwater system map has been revised, improved and entered into a GIS database.                                                               |
| 3     | (12) Construction Site Erosion Control/ Site Plan Review | Goal Met – All construction site plans & SWP3(s) in the MS4 were reviewed.                                                                                 |
| 3     | (13) Construction Site Inspection & Enforcement          | Goal Met – All Construction sites in the MS4 were inspected for erosion control BMPs. 218 inspections & follow-up inspections were conducted by MS4 staff. |
| 4     | (14) Post Construction SW Management                     | Goal Partially Met – No formal Maintenance Agreements were executed in Year-6.                                                                             |
| 5     | (15) Inventory Facilities & Stormwater Controls          | Goal Met – Inventory of all Lucas owned and maintained facilities is complete.                                                                             |
| 5     | (16) Contractor Requirements & Oversight                 | Goal Met – Contractors were monitored by MS4 staff to verify stormwater requirements were met.                                                             |
| 5     | (17) O&M Self Assessment & BMPs                          | Goal Met – No new activities were identified which have potential to pollute stormwater.                                                                   |
| 2,3,4 | (18) Legal Authority                                     | Goal Met – Four (4) enforcement actions were executed in Year-5.                                                                                           |

### C. Stormwater Data Summary

Provide a summary of all information used, including any lab results (if sampling was conducted) to assess the success of the SWMP at reducing the discharge of pollutants to the MEP. For example, did the MS4 conduct visual inspections, clean the inlets, look for illicit discharge, clean streets, look for flow during dry weather, etc.?

Sampling was not required to be conducted. MS4 staff checked & cleared debris from culvert inlets as required. Visual inspections were conducted on a regular basis as part of the MS4's Culvert Inspection Program. The MS4 staff duties have contributed to the ongoing reduction of stormwater pollutants to the maximum extent practicable.

## D. Impaired Waterbodies

1. Identify whether an impaired water within the permitted area was added to the latest EPA-approved 303(d) list or the Texas Integrated Report of Surface Water Quality for CWA Sections 305(b) and 303(d). List any newly-identified impaired waters below by including the name of the water body and the cause of impairment.

None

2. If applicable, explain below any activities taken to address the discharge to impaired waterbodies, including any sampling results and a summary of the small MS4's BMPs used to address the pollutant of concern.

None

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

Not Applicable

4. Report the benchmark identified by the MS4 and assessment activities:

| <b>Benchmark Parameter<br/>(Ex: Total Suspended Solids)</b> | <b>Benchmark Value</b> | <b>Description of additional sampling or other assessment activities</b> | <b>Year(s) conducted</b> |
|-------------------------------------------------------------|------------------------|--------------------------------------------------------------------------|--------------------------|
|                                                             |                        | <u>Not Applicable</u>                                                    |                          |

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

| <b>Benchmark Parameter</b> | <b>Selected BMP</b>   | <b>Contribution to achieving Benchmark</b> |
|----------------------------|-----------------------|--------------------------------------------|
|                            | <u>Not Applicable</u> |                                            |

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

| <b>Description of<br/>bacteria-focused BMP</b> | <b>Comments/Discussion</b> |
|------------------------------------------------|----------------------------|
| <u>Not Applicable</u>                          |                            |

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

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

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

| <b>Benchmark Indicator</b> | <b>Description/Comments</b> |
|----------------------------|-----------------------------|
| <u>Not Applicable</u>      |                             |

## E. Stormwater Activities

Describe activities planned for the next reporting year:

| MCM(s) | BMP | Stormwater Activity                                                                                                                   | Description/Comments                                             |
|--------|-----|---------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------|
| 1      | 1   | <del>Distribute Stormwater Pollution Reduction Educational Flyers in Utility Bills Once Annually</del>                                | Program is now governed under newly adopted SWMP beginning 2025. |
| 1      | 2   | <del>Email one Stormwater BMP Training Video to All City Employees</del>                                                              | Program is now governed under newly adopted SWMP beginning 2025. |
| 2,3    | 3   | <del>Train New MS4 Staff of IDDE Program, Spill Response, Construction Site Erosion Control and Soil Stabilization Requirements</del> | Program is now governed under newly adopted SWMP beginning 2025. |
| 5      | 4   | <del>Train City's New O&amp;M Employees of Stormwater BMPs &amp; Good Housekeeping for Hazardous Materials</del>                      | Program is now governed under newly adopted SWMP beginning 2025. |
| 1      | 5   | <del>Organize &amp; Conduct Public Involvement Trash Collection Event</del>                                                           | Program is now governed under newly adopted SWMP beginning 2025. |
| 1      | 6   | <del>Post Annual Report within 30 days of Due Date on Website (&amp; Post NOC, if any)</del>                                          | Program is now governed under newly adopted SWMP beginning 2025. |
| 1      | 7   | <del>Post Educational Stormwater Videos or Informational Links on Website (One new video added or substituted annually)</del>         | Program is now governed under newly adopted SWMP beginning 2025. |
| 1,2    | 8   | <del>Document Reports and City Responses to Public Stormwater or Pollution Related Concerns</del>                                     | Program is now governed under newly adopted SWMP beginning 2025. |
| 2      | 9   | <del>Continue Development of IDDE Program Summary &amp; Provide Document to MS4 Staff</del>                                           | Program is now governed under newly adopted SWMP beginning 2025. |
| 2      | 10  | <del>Inspect Illicit Discharges &amp; Assert Authorities as required to Remediate any Pollution Source &amp; Document instances</del> | Program is now governed under newly adopted SWMP beginning 2025. |

|       |    |                                                                                                                                                                                                                                      |                                                                  |
|-------|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------|
| 2     | 11 | <del>Formalize MS4 Map with CADD Software &amp; Display Printed Map in workplace of City Stormwater Employees</del>                                                                                                                  | Program is now governed under newly adopted SWMP beginning 2025. |
| 3     | 12 | <del>Require All Construction Site Operators within MS4 to provide copy of TCEQ Site Notice &amp; Report Site Stabilization Violations (14-Day Delinquencies) to TCEQ</del><br><br><del>Review SWP3 for all Construction Sites</del> | Program is now governed under newly adopted SWMP beginning 2025. |
| 3     | 13 | <del>Perform Construction Site Inspections of Disturbed Sites &amp; Follow-up Inspections (Document with Inspection Report Form)</del>                                                                                               | Program is now governed under newly adopted SWMP beginning 2025. |
| 4     | 14 | <del>Require Maintenance Plan for Permanent, Privately Owned, Stormwater Controls</del><br><br><del>(Document Post Construction Drainage O&amp;M Activities &amp; Enforcement Actions)</del>                                         | Program is now governed under newly adopted SWMP beginning 2025. |
| 5     | 15 | <del>Update Inventory List of Stormwater Controls &amp; Facilities of Concern for Pollutant Handling that are Owned or Operated by the City</del>                                                                                    | Program is now governed under newly adopted SWMP beginning 2025. |
| 5     | 16 | <del>Assert Contractor Oversight for City Projects &amp; Require Contractor Agreements for Stormwater Control Measures &amp; Good Housekeeping Practices for City Projects</del>                                                     | Program is now governed under newly adopted SWMP beginning 2025. |
| 5     | 17 | <del>Evaluate use of Materials or Chemicals which have Potential to Pollute Stormwater &amp; Employ Pollution Prevention Measures, as required</del>                                                                                 | Program is now governed under newly adopted SWMP beginning 2025. |
| 2,3,4 | 18 | <del>Adopt Proposed Ordinance(s) (RQD: Within 2-years)</del>                                                                                                                                                                         | Program is now governed under newly adopted SWMP beginning 2025. |

## F. SWMP Modifications

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

☒ X Yes ☐ No

2. Changes have been made or are proposed to the SWMP since the NOI or the last annual report, including changes in response to TCEQ's review.

\_\_\_ Yes X No

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

| MCM(s) | Measurable Goal(s) or BMP(s) | Implemented or Proposed Changes (Submit NOC as needed) |
|--------|------------------------------|--------------------------------------------------------|
|        | <u>Not Applicable</u>        |                                                        |

**Note:** If changes include additions or substitutions of BMPs, include a written analysis explaining why the original BMP is ineffective or not feasible, and why the replacement BMP is expected to achieve the goals of the original BMP.

3. Explain additional changes or proposed changes not previously mentioned (i.e. dates, contacts, procedures, annexation of land, etc.).

## G. Additional BMPs for TMDLs and I-Plans

Provide a description and schedule for implementation of additional BMPs that may be necessary, based on monitoring results, to ensure compliance with applicable TMDLs and implementation plans.

| BMP | Description           | Implementation Schedule (start date, etc.) | Status/Completion Date (completed, in progress, not started) |
|-----|-----------------------|--------------------------------------------|--------------------------------------------------------------|
|     | <u>Not Applicable</u> |                                            |                                                              |

## H. Additional Information

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

\_\_\_ Yes X No

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

Name and Explanation:

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

☐ Yes ☒ No

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

☐ Yes ☐ No

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

Authorization Number: \_\_\_\_\_ Permittee: \_\_\_\_\_

## I. Construction Activities

1. The number of construction activities that occurred in the jurisdictional area of the MS4 (Large and Small Site Notices submitted by construction site operators):

16

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

☐ Yes ☒ No

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

|                                                                                             |                       |
|---------------------------------------------------------------------------------------------|-----------------------|
| <b>The number of municipal construction activities authorized under this general permit</b> |                       |
| The total number of acres disturbed for municipal construction projects                     | <u>Not Applicable</u> |

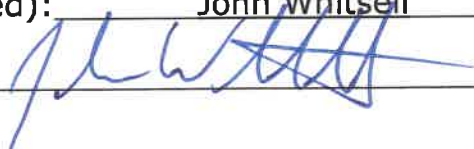
**Note:** Though the seventh MCM is optional, implementation must be requested on the NOI or on a NOC and approved by the TCEQ.

## J. Certification

If this is this a system-wide annual report including information for all permittees, each permittee shall sign and certify the annual report in accordance with 30 TAC §305.128 (relating to Signatories to Reports).

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

Name (printed): John Whitsell Title: City Manager

Signature:  Date: 3/20/25

Name of MS4 City of Lucas MS4

**If you have questions on how to fill out this form or about the Stormwater Permitting program, please contact us at 512-239-4671.**

Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, contact us at 512-239-3282.