



City of Lucas
665 Country Club Road
Lucas, Texas 75002

March 26, 2021

Texas Commission on Environmental Quality
Stormwater Team Leader (MC-148)
P.O. Box 13087
Austin, Texas 78711-3087

Re: Phase II MS4 Annual Report Transmittal for City of Lucas MS4
TPDES Authorization: TXR040547

Dear Team Leader:

This letter serves to transmit the required annual report for the Texas Pollutant Discharge Elimination System Small Municipal Separate Storm Sewer System General Permit, Authorization Number TXR040547 for the City of Lucas MS4.

The annual report is for Year 2. The reporting period beginning 01/01/2020 and ending 12/31/2020.

A separate Notice of Change has not been submitted based on the fact that changes have not been proposed for the next permit year.

As required by the general permit, a copy of the report has been mailed to the TCEQ's regional office 4 in Fort Worth, Texas.

Sincerely,

A handwritten signature in blue ink, appearing to read "Stanton Foerster, P.E.", is positioned below the word "Sincerely,".

Stanton Foerster, P.E.
City Engineer

CC: Mr. Jeff Tate (TCEQ Region 4)
Ms. Joni Clarke (City Manager)

Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number TXR040000

A. General Information

Authorization Number: TXR040547

Reporting Year: 2

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) 01/01/2020

Reporting period end date: (month/date/year) 12/31/2020

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

Contact Name: Stanton Foerster, P.E. Telephone Number: 972-912-1208

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

E-mail Address: stanton@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**):

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
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, contractual agreements for 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**):

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
1	1: Public Education & Outreach	Stormwater Flyers	2793	Flyers	Yes, Information to public enhances pollution precaution.
1	5: Waste Cleanup	Weight of Collected waste	4645	Pounds	Yes, the collected waste was removed from the MS4.
3	13: Construction Site Inspection	Construction Sites	170	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	20	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**):

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
1	(1) Distribute Stormwater Flyers to City Account Holders	Goal Met – Account holders were provided informational stormwater flyer with annual newsletter in Year 2. 2,793 Flyers were sent.
1	(2) City Employee Training	Goal Met – One Stormwater training video was emailed to all City employees in Year-2.
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-2.
1	(5) Waste Cleanup	Goal Met – A public involvement trash collection event was successfully organized by the City; resulting in 4,645 pounds of trash collected.
1	(6) Post SWMP on Website & Public Notice	Goal Met – Lucas’ SWMP and the Year 1 (2019) Annual Report are posted on City’s website.
1	(7) Website Education	Goal Met – Lucas’ website includes a stormwater education page, and one new video was added in Year-1.
1,2	(8) Public Stormwater Reporting	Goal Met – Reporting tool is on the City’s website, however there were no reports made in Year 2 (2020).
2	(9) IDDE Program Summary	Goal Not Met – IDDE program document was prepared and distributed to MS4 staff
2	(10) IDDE Enforcement	Goal Met – However there were no reported illicit discharges
2	(11) Storm Sewer Map	Goal Met – Stormwater system map was carried over from previous permit term.

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. 170 inspections & follow-up inspections were conducted.
4	(14) Post Construction SW Management	Goal Met – However no formal Maintenance Agreements were executed in Year-2
5	(15) Inventory Facilities & Stormwater Controls	Goal Met – The Permittee-Owned Inventory list was updated Year-2.
5	(16) Contractor Requirements & Oversight	Goal Met – Contractor Oversight Procedures document was carried over from previous term.
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 – City Council adopted SWMP ordinance. Twenty (20) enforcement actions were executed in Year-2.

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 an irregular basis as MS4 staff was deployed to the field. 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.

According to the 2020 Texas 303(d) List that was approved by the EPA on 5/12/20, Muddy Creek (0820C), which Directly receives a portion of the MS4's discharge, is Not Impaired. Lake Lavon (0821) & Lake Ray Hubbard (0820), which Indirectly receive the MS4's discharge, are also Not Impaired.

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.

Not Applicable

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:

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

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

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

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

Description of bacteria-focused BMP	Comments/Discussion
<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.

Benchmark Indicator	Description/Comments
<u>Not Applicable</u>	

E. Stormwater Activities

Describe activities planned for the next reporting year:

MCM(s)	BMP	Stormwater Activity	Description/Comments
1	1	Distribute Stormwater Pollution-Reduction Educational Flyers in Utility Bills Once Annually	
1	2	Email one Stormwater BMP Training Video to All City Employees	
2,3	3	Train New MS4 Staff of IDDE Program, Spill Response, Construction Site Erosion Control and Soil Stabilization Requirements	
5	4	Train City's New O&M Employees of Stormwater BMPs & Good Housekeeping for Hazardous Materials	
1	5	Organize & Conduct Public-Involvement Trash Collection Event	
1	6	Post Annual Report within 30-days of Due Date on Website (& Post NOC, if any)	
1	7	Post Educational Stormwater Videos or Informational Links on Website (One new video added or substituted annually)	
1,2	8	Document Reports and City Responses to Public Stormwater or Pollution-Related Concerns	
2	9	Continue Development of IDDE Program Summary & Provide Document to MS4 Staff	
2	10	Inspect Illicit Discharges & Assert Authorities as required to Remediate any Pollution Source & Document instances	
2	11	Formalize MS4 Map with CADD Software & Display Printed Map in workplace of City Stormwater Employees	

3	12	Require All Construction Site Operators within MS4 to provide copy of TCEQ Site Notice & Report Site Stabilization Violations (14-Day Delinquencies) to TCEQ Review SWP3 for all Construction Sites	
3	13	Perform Construction Site Inspections of Disturbed Sites & Follow-up Inspections (Document with Inspection Report Form)	
4	14	Require Maintenance Plan for Permanent, Privately-Owned, Stormwater Controls (Document Post Construction Drainage O&M Activities & Enforcement Actions)	We will assess current formal agreements and consider/ implement additional agreements.
5	15	Update Inventory List of Stormwater Controls & Facilities of Concern for Pollutant Handling that are Owned or Operated by the City	
5	16	Assert Contractor Oversight for City-Projects & Require Contractor Agreements for Stormwater Control Measures & Good Housekeeping Practices for City-Projects	
5	17	Evaluate use of Materials or Chemicals which have Potential to Pollute Stormwater & Employ Pollution Prevention Measures, as required	
2,3,4	18	Adopt Proposed Ordinance(s) (RQD: Within 2-years)	

F. SWMP Modifications

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

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 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 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):

3

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:

The number of municipal construction activities authorized under this general permit	
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): Joni Clarke Title: City Manager

Signature:  Date: 3/29/21

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.