



The City Of

San Angelo, Texas

Engineering Services Department

301 West Beauregard Ave, San Angelo, TX, 76903

April 18, 2023

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 San Angelo
TPDES Authorization: TXR040277

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 TXR040277 for the City of San Angelo.

The annual report is for Year 4. The reporting period's beginning 1/24/2022 and ending 1/23/2023.

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 provided to the TCEQ's regional office eight (8) in San Angelo and other applicable MS4s.

Sincerely,

A handwritten signature in blue ink that reads "Shelly Rohmfeld".

Shelly Rohmfeld
Stormwater Program Administrator
shelly.rohmfeld@cosatx.us

Attachment: Permit Year 4 MS4 Annual Report

Cc: Winona Henry, P.E., Regional Director – TCEQ Region 8
Chris Cowen, P.E., District Engineer – San Angelo TxDOT District
Judge Lane Carter, Tom Green County Judge, Tom Green County
Erika Alanis Unger, Stormwater Manager – Goodfellow Air Force Base
Sam Spooner, Stormwater Manager – Angelo State University

| | | | |
|--|---|--|---|
| Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.). | X | | All eligibility requirements met. |
| Permittee conducted an annual review of its SWMP in conjunction with preparation of the annual report | X | | Annual review of SWMP conducted while this report was prepared. |

2. Provide a general assessment of the appropriateness of the selected BMPs. You may use the table below to meet this requirement:

| MCM(s) | BMP | BMP is appropriate for reducing the discharge of pollutants in stormwater |
|---------------|---------------------------------------|--|
| 1 | 1. Stormwater Information Website | Yes. It offers an avenue to educate the public about pollution prevention and the importance of stormwater quality on a local level. |
| 1 | 2. Public Reference | Yes. Allows the public access to information in print. Creates awareness for the stormwater program. |
| 1 | 3. Stormwater Education Videos | Yes. Offers an opportunity to reach more of the public via YouTube channel and Public Access Channel. |
| 1, 2 | 4. Storm Drain Marking | Yes. Marked drains are obvious in public areas and promote understanding of the City's stormwater drainage system and pollution prevention. |
| 1 | 5. Youth Education Programs | Yes. Youth programs offer a fun way to learn about pollution prevention. Programs set a foundation for future adults to be stormwater smart. |
| 1 | 6. City Employee Stormwater Education | Yes. This program ensures that City employees understand the importance of being mindful regarding stormwater and pollution prevention. |

| | | |
|-----|---|---|
| 2 | 14. Bulk Trash Program | Yes. The curbside bulk pickup program reduces illegal dumping by offering citizens a way to dispose of large items that typically show up on the side of the road and often in storm drains. |
| 2 | 15. Sanitary Sewer Line Maintenance and Inspection | Yes. Maintenance and inspection of sewer lines reduce the likelihood of leaks infiltrating the soil and reaching surface waters. Proper care of sewer lines also reduces the probability of system failures and main breaks. |
| 2,3 | 16. Construction Site Operator Inspection and Enforcement | Yes. Regular inspections at public and private sector construction sites ensure that erosion control measures are regularly and adequately installed and maintained. It reduces the potential of sediment and other pollutants from leaving construction sites. |
| 3 | 17. Site Plan Review | Yes. Site plan reviews are the first line of defense in preventing contaminated stormwater discharges. Site plans also assist in ensuring that certain businesses implement permanent structural controls based on the type of discharges that may be present at the facility. |
| 4 | 18. Post-Construction Stormwater Management | Yes. The City's drainage ordinance and design specifications ensure that stormwater flows are metered to prevent flooding, erosion and offer an opportunity to reduce suspended solids in stormwater runoff. |
| 4 | 19. Engineering Design Review | Yes. This review program offers an avenue to safeguard the City and surrounding properties from flooding, unauthorized discharges, and other issues that may not be included in the short term of construction. This review program protects the City long-term and offers a variety of benefits. |

| | | |
|-------|-------------------------------------|--|
| 1,2,5 | 28. Keep San Angelo Beautiful | Yes. Programs offer another mechanism for public outreach and education, and community events to clean up the City. Trash collected from these events directly reduces the amount that reaches surface waters. |
| 1,2 | 29. Fats, Oils, and Greases Program | Yes. The evolution of this program educates citizens and businesses about their impacts on the City's sewer system when it comes to FOG. A reduction of sewer pipes clogged by FOG prevents sewer backups and ultimate discharges to the City's MS4. |

3. Describe progress towards achieving the goal of reducing the discharge of pollutants to the maximum extent practicable (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:

| MCM | BMP | Information Used | Quantity | Units | Does the BMP Demonstrate a Direct Reduction in Pollutants? |
|------------|------------|--------------------------------|-----------------|-----------------------------------|---|
| 1,2 | 1 | Stormwater Information Website | 970 | Page Views | No. Creates awareness and educated the public about measures to reduce pollutants in stormwater. |
| 1 | 2 | Public Reference | 998 | Door hangers / educational fliers | No. Offers another way to educate the public, leading to a reduction in contaminants. |
| 1 | 3 | Stormwater Educational Videos | 365 | Video airings | No. Educational videos reach a broad spectrum of citizens. Videos do create awareness and will lead to a reduction of pollutants. |

| | | | | | |
|-----------|----|-------------------------|-----|---------------------------------|--|
| 1,2,3,4,5 | 9 | City Inspector Training | 6 | Certified Stormwater Inspectors | Yes. The program ensures that inspectors quickly identify stormwater violations and allows the ability to ensure compliance is reached before discharges occur. |
| 1,2 | 10 | Public Reporting | 43 | Calls/Emails | Yes. The public can report Stormwater concerns and violations, which allows the City to respond quickly and prevent / mitigate discharges into the MS4. |
| 1,2 | 11 | Adopt-A-Spot | 12 | Events | Yes. Volunteers pick up trash and other debris in parks around the City. This directly reduces amount of trash and other debris from entering surface waters and reducing water quality. |
| 2 | 12 | IDDE Program | 11 | IDDE Inspections | Yes. Staff is trained to identify potential IDDE and conduct inspections, potentially identifying and mitigating a source of stormwater pollution. |
| 2 | 13 | MS4 Mapping | 396 | Map Additions / Revisions | No. Mapping does not directly reduce discharge of pollutants, it does assist in finding areas for dry weather screening and inspect outfalls for potential illicit discharges. |

| | | | | | |
|-------|----|--|-----|---------------------------|--|
| 4 | 18 | Post-construction Stormwater Controls | 4 | Inspections | Yes. Inspections of structural controls allows us to repair/maintenance controls to ensure their effectiveness. Structural controls that operate correctly directly reduce pollutants. |
| 4 | 19 | Engineering Design Review | 15 | Reviewed Drainage Studies | No. Drainage study reviews do not directly reduce pollutants. Drainage infrastructure installed will prevent pollutants and review is necessary to ensure design is adequate. |
| 5 | 20 | Chemical Applications and Material Management | 11 | Licensed Applicators | Yes. Proper training and licenses are essential to understand the importance of appropriate usage rates of chemicals and response to incidental spills. When applications are correctly applied, it reduces the likelihood of pesticides and herbicides from entering surface water. |
| 2,4,5 | 21 | Storm Sewer System / Structural Control Maintenance and Inspection | 249 | Tons of Debris | Yes. Maintenance of the City's MS4 system reduces the likelihood of pollutants reaching surface waters. This program removes debris and repairs voids in City-owned stormwater controls resulting in a direct reduction in pollutants. |

| | | | | | |
|-------|----|-----------------------------|-----|-----------------------|---|
| 1,2,5 | 27 | Pet Waste Reduction Program | 50 | Materials Distributed | Yes. This program not only offers educational components, but also offers waste receptacles in parks for pet waste. Removal of pet waste will cause a direct reduction in pollutants and this BMP also serves as a focused BMP for bacteria impairment. |
| 1,2,5 | 28 | Keep San Angelo Beautiful | 108 | Events | Yes. The cleanup events held by KSAB remove trash and hazardous waste from the City. |
| 1,2 | 29 | Fats, Oils, Greases | 0 | Inspections | Yes. This program ensures that grease and grit traps are maintained and prevents the City's sewer from being clogged with grease blocks, backing up the system, and creating unnecessary overflows. |

4. Provide the measurable goals for each of the MCMs, and an evaluation of the success of the implementation of the measurable goals:

Measurable goals for Permit Year 4 for each of the five minimum control measures, as well as progress made towards achieving those goals, are listed below. Some of the measurable goals highlight several MCMs; additional MCMs that apply are denoted with asterisks.

MCM 1 – Public Education and Outreach

| Measurable Goal | Progress toward goal or how goal was achieved. | Additional MCMs |
|------------------------|---|------------------------|
| Update/Revise Website | Met Goal – Updates were made to the website that included staffing updates and information updates. | |

| | | |
|--|---|--------------|
| Reach at least 50 members of the development community | Exceed Goal – During the HBA luncheon, there were various members of the development community, including, but not limited to, builders, engineers, developers, Council members and City staff. | *MCM 2,3,4 |
| Goal of 80% CSI for Engineering Inspectors | Exceeded Goal – 100% of engineering inspectors have their CSI. | *MCM 2,3,4,5 |
| One training for inspection staff annually | Met Goal – Staff conducted one training specifically for the inspection staff. | *MCM 2,3,4,5 |
| Stormwater reporting number/email will be advertised on the City's Facebook page twice a year. | Goal not met – The Stormwater Reporting number/email was not shared on the City's Facebook page. | *MCM 2 |
| Have at least five volunteer cleanup events annually | Exceeded Goal – There were 11 cleanups across the City and one adopt-a-spot cleanups documented. | *MCM 2 |

MCM 2 – Illicit Discharge Detection and Elimination (IDDE)

| Measurable Goal | Progress toward goal or how goal was achieved. | Additional MCMs |
|--|---|------------------------|
| Document 100% IDDE program and response | Met Goal – Staff documented and followed-up on 11 reported IDDE according to the procedures established in the procedural manual. | |
| Document all changes to MS4 outfalls/City-owned stormwater structures | Met Goal – 396 revisions and additions to the City's GIS MS4 mapping system made during the permit term. | |
| Evaluate program effectiveness to hit a measurable goal of 2% reduction annually | Exceeded Goal – Bulk collection decrease to 5,458.17 tons this permit year, which is over a 2% decrease from last year's 5,573.18 tons. | |
| Inspect at least 70,000 linear feet annually | Exceeded Goal – City crews inspected 325,000 feet of sewer lines. | |

MCM 5 – Municipal Pollution Prevention and Good Housekeeping

| Measurable Goal | Progress toward goal or how goal was achieved. | Additional MCMs |
|--|---|---------------------------------|
| Conduct/coordinate training for licensed and non-licensed applicators at least one time/year | Exceeded Goal – 11 Licensed Applicators and non-licensed applicators attended on average 4 required trainings each. | |
| Conduct maintenance on at least 10% of City-owned drains | Exceeded Goal – Open drains mowed, culverts cleaned, and 249 tons of debris cleaned from City-owned drains annually. Out of 48 network structures, all drains were maintained as necessary. | *MCM 2 & 4 |
| Inspect at least 20% of City- owned drains annually | Exceeded Goal – Over 50% of network structures were inspected. | *MCM 2 & 4 |
| Sweep at least 80% of City streets annually | Exceeded Goal: All lane miles within the City's jurisdiction were swept at least once a year, with a total of 4,813.2 miles swept. | |
| Public Spill Response | Met Goal – SAFD attend at least one HAZMAT Training. | *MCM 2 |
| Inspect all municipal facilities one time per year. | Met Goal – Created and implemented Pollution Prevention Plans for all 9 high priority facilities and inspected all 9 facilities. | |
| Conduct one document review and one site inspection per Industrial facility | Met Goal – One document review and site inspection was completed for each City Industrial facility. | |
| Conduct at least two river cleanups annually | Exceeded Goal – Seven river cleanups completed by Stormwater Operations and eleven river cleanups completed by Keep San Angelo Beautiful (KSAB) volunteers. | *MCM 2 <i>DDO Impairment</i> |

| Drain Cleaning/Structural Control Maintenance | |
|--|-------------------------------|
| Month | Debris Removal in Tons |
| January | 0 |
| February | 0 |
| March | 0 |
| April | 0 |
| May | 118.25 |
| June | 62.25 |
| July | 15.54 |
| August | 34.47 |
| September | 0 |
| October | 2.01 |
| November | 12.72 |
| December | 2.11 |
| January | 1.87 |
| Yearly Total | 247.35 |
| 2021 Total | 56.17 |
| 2020 Total | 39.95 |

Storm sewer system inspections are critical to the effectiveness of the City’s SWMP. The City’s visual inspection program occurs when a project is planned in a specific district. Crews will document the area, visually inspect drains, culverts, etc., and perform inspections on drains. Below you will find a monthly breakdown of the structural control inspections program:

| Structural Control Inspections | |
|---------------------------------------|--------------------|
| Month | Inspections |
| January | 0 |
| February | 0 |
| March | 0 |
| April | 0 |
| May | 0 |
| June | 1 |
| July | 0 |
| August | 0 |
| September | 1 |
| October | 0 |
| November | 0 |
| December | 1 |
| January | 1 |
| Yearly Total | 4 |
| 2021 Total | 0 |

practices to alleviate some of the issues associated with stormwater quality but understands the nature of the river impacts oxygen levels.

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.

Best management practices to address discharges for depressed dissolved oxygen and bacteria are described in detail below:

Depressed Dissolved Oxygen – As noted above, depressed dissolved oxygen is a problem the City will always face unless the river becomes an actual flowing river. Still, the City's stormwater management plan does include best management practices to reduce urban impacts. Methods include the City's street sweeping program, which removes organic matter and sediment from curbs and gutters. The City also participates in the chemicals and materials management program, focusing on the importance of proper chemical application, such as fertilizers in parks and drainage ways. The construction stormwater inspection program prevents sediment from entering the City's MS4. Other elements include park and river cleanup programs, illicit discharge detection and elimination programs, structural controls maintenance programs, and green infrastructure programs. Finally, the City is beginning to implement its Fats, Oils, and Greases (FOG) program to prevent sewer blockage and sewer overflow.

Bacteria – Although bacteria is removed from the 2016 Integrated Report, the City still applies best management practices to maintain improvements. The sanitary sewer inspection and line maintenance program offers an approach to prevent and mitigate issues before reaching surface waters. Small leaks or potentially significant issues identified by the inspection program can be repaired or maintained to avoid discharges. The SCADA system improvements to lift stations offer 24-hour monitoring in real-time for sewer overflows and other malfunctions that could create a pollutant release. On a smaller scale, the Pet Waste Reduction program provides information, materials, and waste receptacles in parks to address pet waste. This program will grow to reach a larger target audience in years to come, which will create more awareness of pet waste impacts on water quality.

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

The City of San Angelo does not discharge to an impaired water body with an approved TMDL. Therefore, targeted controls, measurable goals, and benchmarking requirements are not applicable.

4. Focused Best Management Practices for Bacteria Impairment:

| | | | |
|----|---------------|---|---|
| 8 | 1, 2, 3, 4 | Education for Development Community | Present one stormwater educational program to the developer/builder/engineer/realtor community. |
| 9 | 1, 2, 3, 4, 5 | City Engineering Inspectors Training | Provide one stormwater training per year for City Engineering Inspectors. |
| 10 | 1, 2 | Stormwater Hotline | Advertise stormwater hotline number and reporting email on social media at least twice a year. |
| 11 | 1, 2 | Cleanup Events | Conduct five volunteer cleanup events per year. |
| 12 | 2 | Illicit Discharge Detection and Elimination Program | Document 100% IDDE responses, enforcement actions, and follow-up investigations. |
| 13 | 2 | MS4 Mapping | Make revisions to the City's MS4 Mapping. |
| 14 | 2 | Illegal Dumping Reduction | Evaluate program effectiveness to reach the measurable goal of a 2% reduction in illegal dumping. |
| 15 | 2 | Sanitary Sewer Line Maintenance and Inspection | Inspect at least 70,000 linear feet of sanitary sewer line annually and insure the installation of SCADA on all lift stations. |
| 16 | 2, 3 | Construction Site Inspections | Inspect at least 70% private and public sector construction activities and complete document reviews at least twice a year. |
| 17 | 3 | Site Plan Review | Review at least 80% of site plans annually. |
| 18 | 4 | City-owned Structural Inspections | Develop SOP for privately owned structural control inspections and conduct four inspections annually on City-owned structural controls. |

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

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) |
|-----|-------------|--|--|
| N/A | N/A | N/A | N/A |

H. Additional Information

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

Yes No

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

Yes No

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):

151