



Denton County Department of Public Works



Engineering Division

Mary & Jim Horn Government Center

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March 12, 2019

Texas Commission on Environmental Quality
Storm Water and Pretreatment Team (MC-148)
P.O. Box 13087
Austin, Texas 78711-3087

Re: Phase II MS4 Annual Report Transmittal for Denton County
TPDES Permit Number: TXR040244

Dear Ms. Villalba:

This letter serves to transmit the Year 5 Annual Report for the Texas Pollutant Discharge Elimination System (TPDES) Small Municipal Separate Storm Sewer System (MS4) General Permit, Authorization Number TXR040244 for Denton County.

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

Sincerely,

A handwritten signature in blue ink that reads "Fred Ehler".

Fred Ehler, P.E., CFM
Director of Public Works

Cc: TCEQ
2309 Gravel Drive
Fort Worth, Texas 76118

Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number TXR040000

A. General Information

Authorization Number: **TXR040244**

Reporting Year (year will be either 1, 2, 3, 4, or 5): 5

Annual Reporting Year Option Selected by MS4:

Calendar Year _____

Permit Year x

Fiscal Year: _____ Last day of fiscal year: (_____)

Reporting period beginning date: (month/date/year) 12/13/17

Reporting period end date (month/date/year) 12/12/18

MS4 Operator Level: 2 Name of MS4: Denton County

Contact Name: Stephen Belknap Telephone Number: 940-349-2998

Mailing Address: 1505 E McKinney Denton, TX 76209

E-mail Address: Stephen.belknap@dentoncounty.com

A copy of the annual report was submitted to the TCEQ Region **YES** x **NO** _____
Region the annual report was submitted. 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 Section B.2.):

	Yes	No	Explain
Permittee is currently in compliance with the SWMP as submitted to and approved by the TCEQ.	xx		
Permittee is currently in compliance with recordkeeping and reporting requirements.	xx		
Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.)	xx		

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

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (yes or no). Explain.
MCM #1 Public Education, Involvement, and Outreach	BMP 1: Maintain a website describing Denton County's Storm Water Management Plan (SWMP).	Yes. The website provides a convenient resource for the public to increase their awareness about the County's SWMP.
MCM #1	BMP 2: Representatives of the Engineering/Stormwater group will attend DSC meetings.	Yes. Attending these meetings provides the opportunity for staff to (1) convey the importance of adhering to the SWMP; (2) define applicable rules and regulations that apply to the proposed development project; (3) answer questions about the County's development/storm water quality requirements.
MCM #1	BMP 3: Provide educational programs/publications to the public.	Yes. This BMP provides easily accessible information for citizens to learn (1) about the County's SWMP; (2) what they can do personally to reduce the discharge of pollutants into the County's storm water system; and (3) who to contact if they have questions or observations regarding the program and/or potential violations.
MCM #1	BMP 4: Participate in the NCTCOG Regional Strategy for Managing Stormwater Quality.	Yes. Completed the commitment response form and participated in cost share.

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MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (yes or no). Explain.
MCM #1	BMP 5: Continue use of portable information booth at public events.	Yes. The attendance of public events afford the Public Works Department an opportunity to interact with citizens on an individual, family or group basis in order to increase awareness of and answer questions about the SWMP.
MCM #1	BMP 6: Provide local residents with information about SmartScape through fliers or news clips.	Yes. The link to the Texas SmartScape website provides a convenient educational resource for the public.
MCM #1	BMP 7: Update and circulate Construction Storm Water Management Program brochure	Yes. This educational brochure presents information about the Storm Water Management Program in an “easy to read” text and picture format.
MCM #1	BMP 8: Comply with applicable public notice requirements in the planning and implementation activities related to implementing this SWMP.	Yes. The County will comply with all required public notices.
MCM #1	BMP 9: Continue use of Stormwater website display of contact phone numbers for public and County employees to report illicit discharges and other stormwater related issues.	Yes. Contact information on the Storm Water web page provides an avenue for the public to ask questions and to report concerns and/or violations.

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MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (yes or no). Explain.
MCM #1	BMP 10: Continue to expand the Adopt-A-County Road program for litter abatement along roadways.	Yes. The Adopt-a-Road program assists in the removal of litter from roadway areas. This litter would potentially otherwise enter a waterway.
MCM #2 Illicit Discharge Detection and Elimination	BMP 11: Continue training County field personnel in recognition and reporting of illicit discharges.	Yes. Continued training will assist the County in identifying and resolving violations and potential violations in a consistent and timely manner.
MCM #2	BMP 12: Continue to notify violators of potential or confirmed illicit discharges and take appropriate corrective actions.	Yes. Notifying violators will help to ensure illicit discharges are addressed.
MCM #2	BMP 13: Inspect and permit newly installed septic systems.	Yes. Ensuring septic systems are installed and operating correctly will reduce the number of potential illicit discharges.
MCM #2	BMP 14: Inspect illegal dumping activities based on reports.	Yes. Inspecting and taking action on illegal dumping will assist in keeping waterways clean.
MCM #2	BMP 15: Update layers on CAD/GIS/GPS to identify all outfalls and their receiving waters.	Yes. Identifying these features on the GIS map will assist the County in maintaining outfalls and identifying and resolving water quality concerns and complaints in a timely manner.
MCM #2	BMP 16: Review reports forwarded by NCTCOG regarding illegal dumping.	Yes. Partnering with NCTCOG will assist the County with monitoring illegal dumping.

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MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (yes or no). Explain.
MCM #3 Construction Site Stormwater Runoff Control	BMP 17: Construction Site Review	Yes. The review of construction plans and construction activities will identify and address any potential or actual water quality issues.
MCM #3	BMP 18: Construction site inspections	Yes. Inspecting construction sites will ensure that the approved water quality control standards are in place and are being effective.
MCM #3	BMP 19: Circulation of the "Preventing Stormwater Pollution at Construction Sites" Brochure.	Yes. This educational brochure, for both the public and contractors, presents examples of construction site BMPs an "easy to read" text and picture format.
MCM #3	BMP 20: Documentation of County projects.	Yes. County projects will be documented and permitted to be in compliance with the Construction General Permit.
MCM #3	BMP 21: Staff training	Yes. Training will ensure County employees are consistent and knowledgeable about construction plan storm water review and site inspection procedures.
MCM #4 Post-Construction Stormwater Management In New Development and Redevelopment	BMP 22: Permit application and plan review.	Yes. Written application and permit review procedures and checklists will support employees in consistently and effectively reviewing site plans.
MCM #4	BMP 23: Post-Construction stormwater controls inspection and maintenance.	Yes. Inspection after project completion will ensure that construction site stabilization controls are both in-place and effective until permanent stabilization is achieved.

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MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (yes or no). Explain.
MCM #5 Pollution Prevention/Good Housekeeping for Municipal Operations	BMP 24: Train employees involved in implementing pollution prevention.	Yes. Training will ensure that County employees are current on implementing pollution prevention and Good Housekeeping practices and procedures.
MCM #5	BMP 25: Facility inventory	Yes. A facility inventory allows the County to effectively monitor all County owned property for SWMP compliance.
MCM #5	BMP 26: Written procedures for proper disposal of waste generated during storm water maintenance.	Yes. Written procedures will ensure the proper disposal of storm water waste in an effective and consistent manner.
MCM #5	BMP 27: Contractor oversight procedures.	Yes. Written procedures will ensure that contractors clearly understand what is expected of them and their operations for compliance with facility with facility- and site specific requirements.

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3. Describe progress towards reducing the discharge of pollutants to the maximum extent practicable. Summarize any information used (such as visual observation, amount of materials removed or prevented from entering the MS4, or if required monitoring data, etc.) to evaluate reductions in the discharge of pollutants.

Since implementation of the SWMP, stormwater management at construction sites, both private and public, has greatly improved. The County strives to reduce the discharge of pollutants to the maximum extent possible through implementation of BMP's contained in our SWMP.

Through training programs and increased diligence, the County is able to identify violations and potential violations in a timely manner. The County is also effectively working with developers to prevent and more quickly resolve water quality issues through establishing working relationships during the Pre-development and Development Service Committee meetings.

The County's goal is to communicate and collaborate with all our users and the public to ensure compliance with the SWMP.

Note: Quantitative information is provided in the next section.

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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**):

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MCM(s)	(BMP) Measurable Goal(s)	Explain progress toward goal or how goal was achieved If goal was not accomplished please explain
1	(1) Record number of hits to web site.	Met goal. Recorded website "hits" per quarter: Q1 – 2615; Q2 – 2868; Q3 – 2662; Q4 – 2339 Website "hits" increased 25% over last year.
1	(2) Attend 75% of DSC meetings	Met goal. Attended 91% of DSC meetings.
1	(3) Distribute at least 200 articles annually	Met goal. Distributed 410 brochures.
1	(4) Complete NCTCOG commitment response form	Met goal. Completed the commitment response form and participated in cost share
1	(5) Participate in at least 1 public event per year.	Met goal. The Public Works Department along with other County staff participated in the North Texas Fair and Rodeo from August 17 – 25, 2018. Bags with educational materials (including SWMP related) were handed out to visitors at the booth.
1	(6) Provide a link to SmartScape on the County web site.	Met goal. Link to Texas SmartScape is provided on Public Works Department Engineering website.
1	(7) Distribute information to 100% of contractors attending DSC meetings.	Met goal. Information was available to contractors attending the DSC meetings for pickup.
1	(8) Publish public notice when required.	Met goal. No legal public notifications were required in 2018.

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1	(9) Record and track reports of illicit discharges.	Met goal. There were no reports of illicit discharges this year.
1	(10) Record number of Adopt-a-Road agreements signed annually with goal of at least one per year.	Did not meet goal. There were no new adoption applications in 2018.
2	(11) Train 30% of employees each year.	Met goal. 30% of appropriate employees received training.
2	(12) Notify 100% of violators.	Met goal. We have taken appropriate action when violations have occurred.
2	(13) Inspect 100% of new septic systems.	Met goal. All septic systems permitted and constructed in 2018 have been inspected by the Environmental Health Department.
2	(14) Inspect 100% of illegal dumping reports.	Met goal. No illegal dumping reports were received in 2018.
2	(15) Update 20% of map each year.	Met Goal 100 % of the map has been updated.
2	(16) Respond to 100% of reports of illegal dumping.	Met goal. No reports of illegal dumping were received in the reporting year.

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3	(17) Written review process documented. File copy of NOI and document County's review for each applicable construction activity.	Met goal. Written review process completed. NOI review is ongoing as they are received.
3	(18) Inspect 100% of large construction projects.	Met goal. All large construction sites were inspected.
3	(19) Make Construction SWM brochure available at County offices and issue with permits. Document number and location of circulations.	Met goal. Brochures are available at the Public Works Department office. We distributed 615 brochures with permits.
3	(20) Prepare permit applications and NOI documentation for submission to TCEQ for applicable projects.	Met goal. The County had no projects requiring NOI's during this reporting year.

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3	(21) Train 100% of applicable staff in stormwater control procedures.	Met goal. Complete.
4	(22) Checklist and process documented.	Met goal. Reviews are ongoing.
4	(23) Inspect sites following receipt of NOT.	Met goal. Sites were inspected following receipt of NOT.
5	(24) Conduct at least one training session annually for Road & Bridge and Facility Maintenance garage.	Met goal. Conducted one training session each for Road and Bridge East and West.
5	(25) Complete inventory of facilities. Evaluate 25% of facilities annually.	Met goal. Inventory completed. 100% of facilities evaluated.
5	(26) Waste disposal procedure developed.	Met goal.
5	(27) Contractor oversight procedure developed.	Met goal.

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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.? (Refer to the MS4 General Permit TXR040000 Part IV Section B.2.(b))

Denton County is not required to provide analytical monitoring as part of the Phase II SWMP. Inspections for stormwater related issues are conducted concurrently with routine road inspections conducted in the County. No violations were noted.

D. Impaired Waterbodies

1. 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: (Refer to MS4 General Permit TXR040000 Part IV Section B.2.(c))

The upper segment of Grapevine Lake (Segment ID 0826_07) is impaired for pH in the upper portion of the reservoir east of Marshall Creek Park. There is no information regarding the specific pollutant and pollutant source. Denton County does not have enough information to ascertain if its stormwater discharges are contributing to pH impairment.

The Elm Fork Trinity River below Lewisville Lake is impaired for sulfate in two segments in Denton County. Segment 0822_04 Upper 1.5 miles of segment and Segment 0822_03 1.0 miles upstream to 4.5 miles downstream of SH 121. Denton County does not have enough information to ascertain if its stormwater discharges are contributing to sulfate impairment.

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2. Describe the implementation of targeted controls if the small MS4 discharges to an impaired water body with an approved TMDL (Refer to the MS4 General permit TXR040000; Part II Section D.4.(a)):

A TMDL has not been established for either of these segments.

3. Report the benchmark identified by the MS4 and assessment activities (Refer to the MS4 General permit TXR040000; Part II Section D.4.(a)(6)):

There are no BMP's addressing the pH or sulfate impairments. If information becomes available indicating the County's discharges contribute to these impairments, focused BMP's will be implemented along with corresponding measurable goals to eliminate the discharge.

E. Stormwater Activities

Describe stormwater activities the MS4 operator plans to undertake during the next reporting year. You may use the table below (Refer to the MS4 General Permit TXR040000 Part IV Section B.2.(d)):

The County is preparing the new SWMP for the issuance of the new permit. Until that time the County will focus its efforts on continuing the same work from the last year of the permit cycle. Once the SWMP is approved, the County will revise as necessary to meet the new permit requirements.

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F. SWMP Modifications

1. 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 (Refer to the MS4 General Permit TXR040000 Part IV Section B.2.(e)):

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.

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

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G. Additional Information

1. Is the permittee relying on another entity to satisfy some of its permit obligations? (refer to the MS4 General Permit TXR040000 Part IV Section B.2.(g))

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:

Name and Explanation:

Name and Explanation:

Name and Explanation:

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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: _____
Authorization Number: _____	Permittee: _____
Authorization Number: _____	Permittee: _____
Authorization Number: _____	Permittee: _____

H. Construction Activities

1. The number of construction activities that occurred in the jurisdictional area of the MS4 (Notices of intent and site notices received; Refer to the MS4 General Permit TXR040000 Part IV Section B.2.(h)) 30

2a. Does the permittee utilize the optional 7th MCM related to construction?

Yes **No**

2b. If 'yes,' then provide the following information for this permit year (refer to the MS4 General Permit TXR040000 Part IV Section B.2.(i)):

The number of municipal construction activities authorized under this general permit	
The total number of acres disturbed for municipal construction projects	

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

I. Certification

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): Fred Ehler Title: Director of Public Works

Signature:  Date: 3-13-2019

Name of MS4 Denton County

Name (printed): _____ Title: _____

Signature: _____ Date: _____

Name of MS4

Name (printed): _____ Title: _____

Signature: _____ Date: _____