Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number TXR040000

A. General Information

Authorization Number: TXR040336

Annual Reporting Year: (calendar year, permit year, or fiscal year): Fiscal Year (10/1/2014 -9/30/2015)

Last day of fiscal year, if applicable: September 30, 2015

MS4 Operator Level: 4

Name of MS4/Permittee: City of Bryan

Contact Name: Mark Jurica Telephone Number: (979) 209-5932

Mailing Address: P.O. Box 1000 Bryan, TX 77803

E-mail Address: mjurica@bryantx.gov

B. Narrative Provisions (Part IV Section B.2.(a))

1. Provide information on the status of complying with permit conditions: (Part V - Standard Permit Conditions):

	Yes	No	Explain
Permittee is currently in compliance with the SWMP as submitted to and approved by the TCEQ.		✓	See Attachment 1 Narrative Provisions
Permittee is currently in compliance with recordkeeping and reporting requirements.	✓		TBD
Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.)	✓		TMDL I-Plan Approved by TCEQ August 22, 2012

2. Provide a general assessment of the appropriateness of the selected BMPs. Use table below or attach a summary, as appropriate (See Example 1 in instructions):

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (yes or no). Explain.
1: Public Outreach	Community Education	Yes. Simple activities such as fertilizing, vehicle maintenance, and home improvements adversely impact our environment when performed incorrectly. Targeting educational materials to inform residents of safe alternatives and good housekeeping practices concerning home and yard maintenance will aid in lowering stormwater impact by this element.
1: Public Education	School Education	Yes. Students have the potential to impact stormwater and water quality in the MS4 and can also positively affect their families' outlook. The City promotes stormwater education within the schools through service learning opportunities, participating in guest speaking opportunities, and by supporting Keep Brazos Beautiful (KBB) in its school education efforts.
1: Public Education	Construction Site Operator Education	Yes. Runoff from construction sites has an identified potential to degrade water quality in the MS4. Waste management, erosion control, and sediment management are points of concern relating to construction sites. The combination of guidance materials and general meetings with City staff are vehicles used in educating construction site operators in protecting water quality within the MS4.
1: Public Education	City Staff Education	Yes. Educational information is disseminated to City employees through electronic announcements, internet websites, new employee orientation, and group meetings. Topics include illicit discharges, floatables and litter, proper management and disposal of used oil and household hazardous wastes, and proper use, application, and disposal of pesticides, herbicides, and fertilizers. Task-specific training is provided, as required, to personnel directly involved in spill prevention and response.
1: Public Education	Public Participation/Volunteer Activities	This measure includes opportunities for a wide variety of people who live, work, and play in Bryan to participate in SWMP development and implementation. Additionally, this measure promotes community awareness and protection of stormwater quality through participation in the storm drain marking, litter cleanup, and stream monitoring.
2: Illicit Discharge	Illicit Discharge Detection and Elimination	Yes. The City's Illicit Discharge Detection and Elimination practices are used to locate and remove prohibited discharges from entering the storm drainage
2: Illicit Discharge	Storm Sewer Screening and Illicit Discharge Inspections	Yes. Inspections are conducted in response to complaints received regarding illicit discharges and/or improper waste disposal or are triggered in response to information obtained through dry weather screening of the storm sewer system.
2: Illicit Discharge	Storm Sewer Map Verification and Update	Yes. Maintaining an updated and accurate map of the storms sewer system is critical to providing timely emergency response for spills and detecting illicit discharges
2: Illicit Discharge	Household Hazardous Waste and Oil Recycling	Yes. Most households routinely use small amounts of pesticides, herbicides, fertilizers, automotive fluids, batteries, paints, and solvents in the day-to-day upkeep of their homes, apartments and condominiums. Improper disposal of these materials through trash collection or poured down the storm drain can result in unwanted impact to the environment.

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (yes or no). Explain.
2: Illicit Discharge	Septic Tanks	Yes. Brazos County Health Department (BCHD) serves as the City's designated health official. The City maintains legal authority prohibiting use of a septic tank when public sewer service is unavailable. The City and BCHD maintain a working relationship allowing co-review of septic tank applications to determine applicability before installation is granted. The City also maintains legal authority addressing performance standards and closure requirements for failing septic tanks located within the city limits.
3: Construction Run Off	Construction Plan Review	No. Expansion of the plan and permit issuance process is needed to ensure construction activity and land disturbance conforms to TXR0150000 and the City' SWMP. See Attachment 1 – Narrative Provision. Amending legal authority to establish a stormwater permit process yields opportunity for improving this BMP. Review of internal policy and process relating to permit issuance for general construction and land disturbance (without amending the existing legal authority) serves as an alternative for BMP enhancement.
3: Construction Run Off	Inspection of Construction Sites and Enforcement of Control Measure Requirements	Yes. The inspection verifies that the structural and non-structural control measures as outlined on the Erosion Control Plan and in the Stormwater Pollution Prevention Plan (SWPPP) are accurately reflected on the site, and are functioning as intended (maintained) to prevent pollution from leaving the site. The City maintains legal authority to inspect construction sites and require site compliance. Opportunity for improvement to this BMP exists in creation of a central database for storage of records pertaining to site inspections, forms relating to the site's permit status, and enforcement actions. This task is expected to be complete in
3: Construction Run Off	Maintain Legal Authority and Guidelines	Yes. The City will maintain its legal authority and update as necessary to comply with the TXR150000, TXR040000, and TXR050000 General Permits. The City will maintain guidance documents for construction and design professionals and make them accessible through the internet. Maintain and revise as necessary the stormwater quality requirements in the standard construction contracts for capital improvement projects. See Attachment 6
4: Post Construction	Bryan City Code Review and Updates	Yes. Regular Code updates maintain the City's ability to enforce the requirements of the permit, in addition to staying current with any updates to state and federal laws.
4: Post Construction	Establish Post-Construction Stormwater Management Program	Some components of this program exist but development of a more formal program is still needed. For large residential sites and commercial sites, a one year warranty inspection is performed at which time any deficiencies are remedied by the owner. If no deficiencies are noted it is at that time that we insure all BMPs that were employed that are not long term BMPs (such as silt fence) are removed from the site. Items to discuss further include long term maintenance of post construction stormwater control measures.

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (yes or no). Explain.
4: Post Construction	Evaluation of Flood Control Projects	Yes. The City evaluates capital improvement projects each year that offer the potential to integrate water quality design features into flood management-focused design. Additionally, all development projects that come through the Site Development Review process are required to provide stormwater detention if greater than one (1) acre for commercial and two (2) acres for single residential lots or prove to the City why the detention would be more detrimental; exemptions to providing detention are only possible low in the watershed adjacent to primary systems where detention would cause stacking of peak flows in the watershed.
4: Post Construction	Implementation and Performance of Structural/Non-structural	Yes. Staffing issues hindered progress in this measure. Inspections were not performed this reporting period. An internal goal of 10 inspections per year is set and will be met going forward.
5: Pollution Prevention & Housekeeping	Municipal Facilities Identification	Yes. The City maintains SOPs for general good housekeeping, equipment washing, and fueling operations and vehicle maintenance, and chemical application. Furthermore, city-owned facility assessments are performed one time per period term.
5: Pollution Prevention & Housekeeping	Training for Municipal Employees	Yes. City employees are trained on the proper procedures for reporting, containing spills and preventing pollutants from entering the storm drains. The combination of monthly group meetings and area-specific focused meetings are used to satisfy the requirement of this element.
5: Pollution Prevention & Housekeeping	Contractor Training Oversight	Yes. Contractors hired by the City for maintaining City-owned facilities are required to comply with good housekeeping practices, stormwater control measures, and facility-specific stormwater management procedures.
5: Pollution Prevention & Housekeeping	Waste Management	Yes. Preventing environmental upset through waste management is as important for protecting the health and sanitation of the community. Disposal of regulated wastes such as motor oils, oil filters, automotive fluids, etc. used by the City are managed through contract or agreement with a service provider.
5: Pollution Prevention & Housekeeping	Pesticides, Herbicides and Fertilizer Application	Yes. Minimizing discharge of pollutants related to storage and application of pesticides, herbicides and fertilizers applied by City staff or contractors to public rights-of-way, parks, and other public property is a key component to protecting water quality.
5: Pollution Prevention & Housekeeping	Street Sweeping	Yes. Street sweeping is performed to limit litter and dust/dirt along public streets, public parking lots, and right-of-ways from being washed into the storm drain. Road debris from traffic flow can add to sediment loading of the storm drain if not properly managed.
5: Pollution Prevention & Housekeeping	Grass Clippings, Leaf Litter, and Animal Waste	Yes. Grass clippings, leaf litter and animal wastes are addressed through several different initiatives to limit biological wastes and nutrients discharges into the MS4. The TMDL and I-Plan establish control measures to address bacteria within the permit area. Existing ordinances will be continually reviewed and revised as needed to ensure success of this measure.
5: Pollution Prevention & Housekeeping	Road and Parking Lot Maintenance	Yes. Control of sediment and debris from municipally-owned road and parking lot maintenance is addressed through several different initiatives. Operating standards for road repair and maintenance (City and contractor) are established to protect water quality.

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (yes or no). Explain.
5: Pollution Prevention & Housekeeping	Cold Weather Conditions	Yes. Application of salt or sand to roadways and sidewalks is performed on a limited basis.
5: Pollution Prevention & Housekeeping	Spill Response	Yes. The City responds to spills and employs spill prevention procedures/practices for proper handling, storage, and disposal of hazardous and non-hazardous materials. HazMat services are used for circumstances requiring specialized handling and disposal of waste.
5: Pollution Prevention & Housekeeping	WWTP Performance	Yes. A waste load allocation of 36.25 CFU/100 mL is established in the Carters Creek TMDL I-Plan for *E. coli* loading associated effluent discharges from the Burton Creek WWTP. Proper operation and maintenance of each WWTP plays a key role in reducing *E. coli* loading to each plant's receiving stream. See Attachments 2, 3, 4
6: MS4 Maintenance Activities	System Repair and Maintenance	Yes. Structural controls within the MS4 that are owned, operated and maintained by the City include the conveyances (creeks and channels) and engineered control systems (drainage inlets and piping systems, culverts, and detention and retention ponds). Ongoing operations and maintenance of these structural controls reduce the discharge of pollutants from the MS4.
6: MS4 Maintenance Activities	Water Quality and Flood Control Structures	Yes. Structural controls within the MS4 that are owned, operated and maintained by the City include the conveyances (creeks and channels) and engineered control systems (drainage inlets and piping systems, culverts, and detention and retention ponds). Ongoing operations and maintenance of these structural controls reduce the discharge of pollutants from the MS4.
6: MS4 Maintenance Activities	Floatables	Yes. Structural controls, litter abatement programs are in place to reduce discharge of floatables into the MS4. Floatables removal improves surface water quality, channel aesthetics, and drainage system conveyance.
6: MS4 Maintenance Activities	Litter Abatement	Yes. The City partners with Keep Brazos Beautiful (KBB) for (1) promoting educational awareness regarding environmental stewardship, and (2) coordinating volunteer efforts in litter collection, and (3) benchmarking aesthetics for city streets and right-of-ways.

3. Describe progress towards reducing the discharge of pollutants to the maximum extent practicable. Summarize any information used (such as monitoring data) to evaluate reductions in the discharge of pollutants. Use a table or attach a narrative description as appropriate:

MCM	BMP	Parameter	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Yes / No / Explain)
1	Community Education	Outreach Materials	▪ $3,732 ▪ 15	▪ Dollars ▪ Events	Yes. Heavy emphasis on public education is focused to illegal dumping and general usage of the sewer system. Work order history combined with system overflows show a reduction in illicit discharges and system overflows.
2	Illicit Discharge & Elimination	Overflows/Releases	▪ 813 ▪ 501 ▪ 44.7	▪ SSOs ▪ Defects Found ▪ Mile of Pipe	Yes. Burton Creek and Country Club Branch are impaired stream segments located within the City of Bryan. A TMDL has been established for these stream segments. Requirements of the

				Tested	MS4 combined with the TDML I-Plan center on identification and elimination of point and non-point sources of *E. coli.* See Attachment 5
3	Construction Site Management	Plans Reviewed	47	Permits Issued	Yes. Sites were inspected on a regular basis with goal of inspecting at least monthly or more frequently if wet weather. Large sites were inspected more frequently than smaller sites.
4	Construction Site Management	Post Construction Controls	56	Inspections	Yes. Commercial and Residential subdivisions having public infrastructure associated with them were inspected at the 1 year warranty period to note any deficiencies and to remove any remaining temporary BMPs such as silt fence.
5	Training for Municipal Employees	Employees Trained	131	Employees Trained	Yes. Training on topics relating to MS4 increase employee education and awareness to permit conditions and responsibilities.
6	System Screening	Inlet Inspections	161	Inspections	Yes. Inlet inspections are databased through work order history. Work orders deter illicit discharges in the future by allowing utility managers the ability to track current and previous conditions/occurrences of an individual inlet.

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 2 in instructions):

MCM(s)	Measurable Goal(s)	Success
1: Public Education	a. Number of PSAs created b. Traffic count (website, application, media, etc.) c. Number of media avenues utilized d. Number of promotional items purchased	a. 0 b. Traffic counter has not been added to website. Staff is working to revamp the website and will add a traffic counter in the following reporting period c. City of Bryan Channel 16, City of Bryan Website, and City of Bryan social media pages are used as outreach to the public. Code Enforcement launched a monthly radio call in show on Radio Alegria (1240 AM) for Spanish speakers. The highlights of the show are published the following week in *La Voz* (Spanish newspaper) d. $3,732 was expensed for purchase of promotional items
1: Public Education	a. Number of presentations b. Number of school events attended c. Number of BEE Bins checked out	a. 15 b. 5 c. KBB's Executive Director left B/CS and transferred to Keep Katy Beautiful (KKB). Lacking leadership within KBB has stalled the organization's programs and outreach. Tracking of BEE Bin usage was not performed this reporting period by KBB
1: Public Education	a. Number of pre-construction meetings performed b. Number of outreach materials distributed	a. 104 b. 104

MCM(s)	Measurable Goal(s)	Success
1: Public Education	a. Number of employees trained in SWMP b. Number training sessions completed c. Number of employees trained in multi-sector permit	a. 119 b. 2 c. 12
1: Public Education	a. Number of cleanups performed by volunteers b. Number of volunteer sampling events (TMDL) c. Website updated	a. 0 b. Volunteer sampling for the TDML is coordinated by Texas Water Resource Institute (TWRI) using students from Texas A&M University. The number of sample sites and collection frequency is maintained by TWRI. c. Brazos Clean Water Website is maintained by Texas Water Resource Institute. Website is updated with information provided by the contributing entities (Bryan, College Station, TAMU, Brazos Co., etc.).
2: Illicit Discharge and Elimination	a. Number of illicit discharge sources identified and corrected b. Number and types of illicit discharge related work order requests issued c. TCEQ SSO Initiative objectives met	a. 1 b. 0 c. SSOI objectives met. SSOI report submitted to TCEQ on October 30, 2015.
2: Illicit Discharge and Elimination	a. Number of sanitary sewer SSOs b. Miles of sanitary sewer inspected using CCTV c. Miles of sanitary sewer pipe cleaned d. Miles of root control application completed e. Number of sewer sub-basins inspected using smoke testing f. Number of private-side sewer defects identified and repaired g. Number of public-side sewer defects identified and repaired h. Number of grease traps inspected i. Percent compliance for grease traps complying with pumping schedule j. Number of educational events attended k. Number of educational materials distributed l. TCEQ SSO Initiative objectives met	a. 813 b. 4.9 c. 87 d. 0 (27 SSOs were corrected by the City resulting from roots) e. 2 f. 435 g. 66 h. In Ground Grease Traps (148), Above Ground Grease Traps (57), Grit Traps (18), and Lint Traps (0) i. In Ground Grease Traps (65%), Above Ground Grease Traps (44%), Grit Traps (10%), and Lint Traps (0%) j. 12 k. Educational materials issued are not tracked. $3,732 was expensed for purchase of promotional items l. SSOI objectives met. Report submitted to TCEQ on October 30, 2015

MCM(s)	Measurable Goal(s)	Success
2: Illicit Discharge and Elimination	a. Number and types of updates to asset inventory and map b. Number of manholes and inlets inspected c. GIS layer updated and current	a. Assets are updated to GIS in real-time. Changes made to GIS are driven by (1) field observations and (2) new construction b. 179 manholes and 179 inlets were inspected this reporting period. c. GIS is updated daily to reflect changes and/or additions made to the water and sewer system base maps
2: Illicit Discharge and Elimination	a. Participation rates per HHW reporting year b. Number of HHW events hosted per year c. Volume of used motor oil and cooking oil recycled	a. Traffic Count: October 2014 (1,270) and April 2015 (1,700) b. 2 c. 985 gallons of used cooking oil was recycled. Recycled quantities for used motor oil and filters were not tracked. The City maintains a contract for collection and recycling services for used motor oil, oil filters, and cooking oil collected from the general public. A contract is also in place for collection and recycling of fluids from the City's mechanic shop.
2: Illicit Discharge and Elimination	a. Number of septic tanks installed in city limits b. Number of enforcement actions against septic tanks located in the city limits c. Number of septic tanks removed from service in the city limits	a. Septic tanks are regulated by the Brazos County Health Department. The City is working with Brazos County to develop a GIS layer for tracking locations of septic tank installation in the City of Bryan to assist both agencies with system management. Water Services is scheduled to extend sewer service along State Highway 21 in the next reporting period. Approximately, 20 +/- septic tanks could be removed from service as part of this effort b. See above c. See above
3: Construction Site Runoff	a. Number of outreach materials distributed b. Number of dual language materials created c. Number of Site Development Review cases d. Number of Building Permits issued e. Number of designed Capital Improvement Projects – percentage of Capital Improvement Projects with SWPPP f. Number of engineered construction plans related to public infrastructure	a. 100 b. 1 c. 209 new cases d. 627 total e. 16 – 100% f. 31
3: Construction Site Runoff	a. Number of complaint-driven inspections b. Number of engineered construction plans related to public infrastructure reviewed c. Number, type, and location of inspections completed	a. 10 b. 3 c. 56 commercial / subdivision construction site inspections; 265 new home sites were inspected by building services but no formal SWPPP inspection was documented. d. 28 total inspections where deficiencies were found out of 56 total inspections; e. 0

MCM(s)	Measurable Goal(s)	Success
	d. Number of inspections needing improvement vs. total number of inspections e. Number of enforcement	
3: Construction Site Runoff	a. Number of ordinances reviewed b. Number of ordinance amendments made or new ordinances adopted	a. 1 (Stormwater Protection Ordinance) b. 0
4: Post Construction Stormwater	a. Number of ordinances reviewed b. Number of ordinances modified c. Number of new ordinances adopted	a. 1 (Stormwater Protection Ordinance) b. 0 c. 0
4: Post Construction Stormwater	a. SOP drafted and practiced b. Database established c. Number of plans reviewed d. Number of site inspections performed e. Number of enforcement actions enacted f. Evaluate continued operation and maintenance practices	a. This needs to be developed in coordination with Development Services, Engineering, Streets and Drainage and Code Enforcement specifically in how to address development of long term maintenance plans, inspection and enforcement thereof b. Database established but needs to be used for post construction. c. We currently do not require or review long term maintenance plans d. 12 commercial/subdivision inspections performed e. 0 – voluntary compliance on issues noted f. As mentioned in (a) above, this area needs development
4: Post Construction Stormwater	a. Number of flood control and drainage capital improvement project design evaluated for water quality measures b. Number of flood control and drainage construction projects with water quality measures initiated c. Number of flood control and drainage construction projects with water quality measures completed d. Types and locations of measures implemented e. Evaluate continued operation and maintenance practices	a. 0 b. 0 c. 0 d. NA e. See Section E Stormwater Activities for planned stormwater activities in the next reporting period

MCM(s)	Measurable Goal(s)	Success
4: Post Construction Stormwater	a. Number of new and redevelopment projects over 1 acre b. Number, type(s) and locations of LID features implemented at City facilities c. Evaluate continued operation and maintenance practices	a. 17 – see Attachment 1 b. 0 c. Ongoing
5: Pollution Prevention & Housekeeping	a. Applicable facilities identified b. Database created c. GIS layer created	d. City-owned facilities identified, databased, and mapped. Assessments completed February 2015 e. City-owned facilities identified, databased, and mapped. Assessments completed February 2015 f. City-owned facilities identified, databased, and mapped. Assessments completed February 2015
5: Pollution Prevention & Housekeeping	a. Number of employees trained in SWMP b. Number training sessions completed c. Number of employees trained in multi-sector permit	a. 119 b. 2 c. 12
5: Pollution Prevention & Housekeeping	a. Number of contractors educated on City's SWMP b. Number of outreach	a. 100 b. General FAQs concerning contractor responsibilities is found on the City's website. *Keep it Clean* and *General Construction and Site Supervision to Improve Stormwater Quality* are brochures made available to the general public through the website, city-hosted education events, and permitting desk (Development Services)
5: Pollution Prevention & Housekeeping	a. Percentage or volume of waste recycled b. Number of waste types recycled	a. The volume and/or percentage of waste recycled are dependent on consumption and resource demand within each department. Tonnage of recycled goods collected from the general public is tracked by the Bryan Recycling Center. Recycled wastestreams processed through weekly in-house (e.g. paper collection, printer cartridges, and E-waste) collection is not tracked b. Oil, oil filters, fluorescent bulbs, brass and misc. water fittings, printer cartridges, office paper, computer and E-waste represent typical wastestreams recycled
5: Pollution Prevention & Housekeeping	a. SOP completed b. Schedule completed c. Number of licensed applicators employed by the City	a. SOPs completed – November 2014 b. General guidance for application and use is found in the SOP. Frequency and occurrence for application is based upon season and weather c. 5
5: Pollution Prevention & Housekeeping	a. Number of street miles swept b. Volume of debris collected through sweeping	a. All streets with a curb are scheduled to be swept 4 times per year. Staffing and equipment outage prevented the above-listed schedule to be met. 149 citizen requested sweep orders were completed. Citizen orders are added to the scheduled sweeping frequency b. ~1,040 yards of waste
5: Pollution Prevention & Housekeeping	a. Number of outreach materials created b. Number of PSAs created c. Percentage of city parks providing animal waste stations	a. 0 outreach materials were created this reporting period. b. 0 PSAs were created this reporting period c. 50%. Installation of the stations is determined by park age and size

MCM(s)	Measurable Goal(s)	Success
5: Pollution Prevention & Housekeeping	a. SOPs completed b. Number of deicing events (location and volume) c. Number of road projects completed (new) d. Number of road projects completed (maintenance)	a. SOPs completed – November 2014 b. 1 (Villa Maria – ~2 yds of sand was used) c. 11 d. 79 road projects completed, 157 concrete patches completed, 699 in house road repairs completed (asphalt), 69 sewer utility cuts completed and 82 water utility cuts completed.
5: Pollution Prevention & Housekeeping	a. Number of city employees trained in spill response b. Number and location of spill events requiring response	a. The Bryan Fire Department (114) serves as the City's lead for emergency response and site containment. Code Compliance Officers (8) and the Safety Officer (1) represent staff-level employees trained in basic spill response. b. Bryan Fire Department maintains an inventory record for dispatch calls and response. A fish kill occurred in the Copperfield Subdivision in March 2015. Notification of the kill was relayed to TCEQ Waco. City staff supported TCEQ and TPWD in field inspections. The Miramount Country Club was determined as the point-source of the fish kill.
5: Pollution Prevention & Housekeeping	a. TPDES Discharge Permit met b. Discharge monitoring reports submitted	a. Permit compliance met for WWTPs. TCEQ granted reduced sample frequency for *E. coli* at Burton Creek and Still Creek WWTPs b. Monthly and reclaimed water discharge monitoring reports submitted monthly.
6: MS4 Maintenance	a. Number of pipe areas scheduled for maintenance b. Number of repairs completed c. GIS layer created d. Database created e. Number of roadside ditches and culverts repaired f. Number of roadside culverts replaced g. Volume of debris removed h. Number of city-maintained ponds inspected	a. Scheduled maintenance is not forecasted for pipe. Performed work on pipe is driven by findings from manhole and inlet inspections. b. ~1,000 ft of pipe was been repaired c. GIS layer is established and updated by projects are complete d. GIS layer is a database of new installed or existing inspected pipes. The actual inspection record is kept in the work order system. When rehab projects change pipe segments the GIS layer is updated usually within 1 year to reflect the changes. e. 205 ditches and culverts were repaired f. 0 g. Volume of waste/debris removed is not tracked. This benchmark will be removed in future reports. h. 8
6: MS4 Maintenance	a. Number of inlets protected b. Number of events where litter intervention is provided c. Volume of debris collected from street cleaning/right-of-way management	a. 4,170 inlets citywide have a stormwater quality notice posted on the inlet. b. Two (2) community wide used tire cleanups were completed this reporting year. Likewise, cleanup of illegal dump sites and non-point litter/debris located within the public right-of-way is a shared duty between Solid Waste and Code Enforcement c. ~1,040 yards of waste are collected and removed through street sweeping. Waste associated with tree trimming and right-of-way clearance is not tracked

MCM(s)	Measurable Goal(s)	Success
6: MS4 Maintenance	a. Number of cleanup events participated in by City staff b. Number of KBB-led events performed c. Volume of debris collected from Solid Waste Assessment Workers	a. 2 illegal tire collection roundups were completed. ~2,500-3,000 illegally dumped tires were collected and removed b. 0 collection events were performed by KBB. Executive Director resigned December 2014 c. 3 fulltime employees are hired to perform litter collection and removal from the right-of-way. Volume of waste collected is not tracked

C. Stormwater Monitoring Data (Part IV Section B.2.(b))

1. The MS4 has conducted monitoring of stormwater quality and submitted in the annual report (i.e. analytical and visual observations).

   Yes ✓ No

   a. Explain below or attach a summary to submit along with any monitoring data used to evaluate the success of the SWMP at reducing pollutants to the maximum extent practicable. Be sure to include a discussion of results:

   Monitoring efforts in the City of Bryan are reflective of (1) visual observations and (2) analytical monitoring. Much of the City's performance relating to visual observations is outlined in the above-listed tables relating to MCMs 1, 2, 3 and 5. Public Works (Sewer, Engineering, Solid Waste, Drainage, and Code Enforcement) is responsible for maintenance and support of the City's drainage system.

   Analytical performance relating to monitoring is captured in permit compliance for the City's three (3) WWTPs along with streamwater quality monitoring associated with the Carters and Burton Creek TMDL.

   See Attachments 2, 3, 4, and 5

D. Impaired Waterbodies (Part IV Section B.2.(c))

1. If applicable, explain below or attach a summary of 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:

   Elements addressing water quality monitoring, infrastructure maintenance and operation, surface water runoff, and development safeguards outlined within the I-Plan are written into the SWMP to ensure continuity for reducing *E. coli* loading among both documents (I-Plan and SWMP).

   The TMDL Allocation Summary table will serve as the ultimate measure of program success. Measureable milestones and implementation schedules from the I-Plan will be used to steer monitoring efforts and

measure program success. SCMs addressing *E. coli* that coincide with control of *E. coli* are highlighted green in each Element.

Indicators of success regarding measures relating to *E. coli* will include: (1) number of sources identified or eliminated, (2) decrease in number of illegal dumping cases, (3) increase in reporting of illegal dumping, (4) number of educational opportunities conducted, (5) reduction in sanitary sewer overflows, and (6) increase in illegal discharge detection through dry screening.

MCMs addressing impaired waterbodies are highlighted in green within this report.

See Attachments 2, 3, 4, 5

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

   See D.1 above.

3. Report the benchmark identified by the MS4 and assessment activities (*Part II Section D.4.(a)(6)*):

Benchmark Parameter	**Benchmark Value (MPN/day)**	**Description of additional sampling or other assessment activities**	**Year(s) conducted**
Bacteria *(E. coli)*	See Attachments 2,3,4	Sampling efforts are performed by (1) TWRI, TCEQ, and BRA for stream sampling and (2) City of Bryan for WWTP performance.	2015

4. Provide an analysis of how the selected BMPs will be effective in contributing to achieving the benchmark (Part II Section D.4.(a)(4)):

Benchmark Parameter	**Selected BMP**	**Contribution to achieving Benchmark**
Bacteria *(E. coli)*	Community Education	Improve water quality within the watershed through public education and outreach.
Bacteria *(E. coli)*	Illicit Discharge Detection and Elimination	Continue implementation of SSO initiatives in the watershed, minimizing impacts of raw sewage being spilled in the watershed due to failures in the wastewater collection and treatment system. See Attachment 3,4,5
Bacteria *(E. coli)*	Storm Sewer Screening and Illicit Discharge Inspections	Improve water quality within the watershed through storm sewer maintenance and inspection to identify and correct illicit discharges or connections.

Benchmark Parameter	Selected BMP	Contribution to achieving Benchmark
Bacteria *(E. coli)*	Sanitary Sewer Overflows and Infiltration	Continue implementation of SSO initiatives in the watershed, minimizing impacts of raw sewage being spilled in the watershed due to failures in the wastewater collection and treatment system. See Attachment 5
Bacteria *(E. coli)*	Septic Tanks	Improve identification, inspection, pre-installation planning, education, operation, maintenance, and tracking of all OSSFs in the watershed to minimize the potential negative water quality impacts from malfunctioning systems.
Bacteria *(E. coli)*	WWTP Performance	Ensures WWTPs are performing in accordance with their TPDES discharge permit. See Attachment 4

5. If applicable, report on focused BMPs to address impairment (*Part II Section D.4.(a)(5)*):

Pollutant to Address	Description of Focused BMP	Comments/Discussion
Bacteria *(E. coli)*	Private Line Repairs/Smoke Testing	City crews proactively smoke test the sanitary sewer system for defects (public and private). 44.7 miles of sewer pipe were smoke tested for this reporting period. 435 private defects were identified and repaired. 100.4 miles of pipe have been smoke tested since FY2012.
Bacteria *(E. coli)*	Sewer Line Cleaning and Inspection	Approximately 87 miles (23% of the sanitary sewer system) was cleaned and inspected in FY2015.
Bacteria *(E. coli)*	Septic Tanks	OSSFs are prohibited for installation if a property is located within 150’ of a sewer service. Bryan Code has established protocols for OSSF abandonment and closure when sewer service becomes available. Design for sewer extension along State Highway 21 is underway. 20 +/- septic systems could be taken out of service as a result of service extension.
Bacteria *(E. coli)*	WWTP Performance	WWTPs perform monitoring for *E. coli* in accordance with their TCEQ-issued discharge permits. TCEQ granted a reduced *E. coli* sample frequency to the Burton Creek WWTP on October 30, 2013 as a result of continued permit compliance relating to *E. coli*.

6. Describe progress in achieving the benchmark (*Part II.D.4.(a)(6)*):

Benchmark Indicator	Description/Comments

Sanitary sewer overflows (SSOs)	SSOs are point sources for *E. coli* and pollutant loading within the watershed. SSO frequency for public overflows slightly decreased for the current monitoring period compared with FY2015 (813) compared with the previous FY2014 (856).
Dry weather screening of storm sewer system	Dry weather screening is performed during routine maintenance by staff to pinpoint cross connections and line breakage. 179 inlet and manhole inspections were completed.
Illegal dumping and prohibited discharge cases worked	Code Enforcement responds to citizen complaints concerning illegal dumping and prohibited discharges: ▪ Illegal Dumping (current: 86, FY2014: 129) ▪ Prohibited Discharges (current: 68, FY2014: 104)
Sanitary sewer system maintenance and inspection	Sanitary sewer pipe cleaning/inspection combined with smoke testing are tools used for upkeep and maintenance of the sanitary sewer system. ▪ Private Defects Found (current:435, FY2014: 330) ▪ Public Defects Found (current: 66, FY2014: 49) ▪ Miles of Pipe Cleaned/Inspected (current: 87, FY2014: 54)

E. Stormwater Activities (Part IV Section B.2.(d))

Describe any stormwater activities the MS4 operator has planned for the next reporting year. Use the table or attach a summary, as appropriate:

MCM(s)	BMP	Stormwater Activity	Description/Comments
1: Public Outreach	Community Education	▪ Review existing outreach ▪ Continuation of outreach ▪ Brainstorm topics and ideas ▪ Brainstorm new media avenues	This MCM is a continuous effort that will be performed for the remainder of the permit term
1: Public Education	School Education	▪ Continue existing outreach program with schools ▪ Evaluate existing programs for program expansion	This MCM is a continuous effort that will be performed for the remainder of the permit term
1: Public Education	Construction Site Operator Education	▪ Continuation of existing programs and services ▪ Evaluate outreach materials and modify as needed ▪ Complete annual multi-sector training for affected staff	This MCM is a continuous effort that will be performed for the remainder of the permit term
1: Public Education	City Staff Education	▪ Evaluate training materials and modify as needed ▪ Complete annual multi-sector training for affected staff	This MCM is a continuous effort that will be performed for the remainder of the permit term
1: Public Education	Public Participation/Volunteer Activities	▪ Continuation of existing programs and services ▪ Brainstorm avenues for increasing public participation ▪ Update website with	This MCM is a continuous effort that will be performed for the remainder of the permit term

MCM(s)	BMP	Stormwater Activity	Description/Comments
		Annual Report	
2: Illicit Discharge	Illicit Discharge Detection and Elimination	▪ Implement training program for illicit discharge investigation and elimination	This MCM is a continuous effort that will be performed for the remainder of the permit term
2: Illicit Discharge	Storm Sewer Screening and Illicit Discharge Inspections	▪ Implement training program for illicit discharge investigation and elimination	This MCM is a continuous effort that will be performed for the remainder of the permit term
2: Illicit Discharge	Storm Sewer Screening and Illicit Discharge Inspections	▪ Continuation of existing programs and services ▪ Identify and correct illicit discharge/connections ▪ Establish training program for illicit discharge investigation and elimination ▪ Facilitate mechanism for reporting and response to residential concerns regarding illegal dumping and discharge of non-stormwater materials	This MCM is a continuous effort that will be performed for the remainder of the permit term
2: Illicit Discharge	Sanitary Sewer Overflows and Infiltration	▪ Continuation of existing programs and services ▪ Identify and correct illicit discharge/connections ▪ Establish training program for illicit discharge investigation and elimination ▪ Facilitate mechanism for reporting and response to residential concerns regarding illegal dumping and discharge of non-stormwater materials	This MCM is a continuous effort that will be performed for the remainder of the permit term
2: Illicit Discharge	Storm Sewer Map Verification and Update	▪ Inspect and verify condition of outfall and water quality ▪ Inspect and verify condition of manholes and inlets (20% of system) ▪ Expansion and maintenance of GIS layers	This MCM is a continuous effort that will be performed for the remainder of the permit term
2: Illicit Discharge	Household Hazardous Waste and Oil Recycling	▪ Continuation of used oil recycling services ▪ Increase marketing and outreach of recycling services	This MCM is a continuous effort that will be performed for the remainder of the permit term

MCM(s)	BMP	Stormwater Activity	Description/Comments
2: Illicit Discharge	Septic Tanks	▪ Continuation of application review with BCHD	This MCM is a continuous effort that will be performed for the remainder of the permit term
3: Construction Run Off	Construction Plan Review	▪ Continuation of Site Development Review and plans review process for Capital Improvement Projects	This MCM is a continuous effort that will be performed for the remainder of the permit term
3: Construction Run Off	Inspection of Construction Sites and Enforcement of Control Measure Req.	▪ Continuation of inspection protocol – (1) at least 1 inspection every 30 days for each active project and (2) after major rain events	This MCM is a continuous effort that will be performed for the remainder of the permit term. Inspection records will be entered into the laserfische database for the first time this year.
3: Construction Run Off	Maintain Legal Authority and Guidelines	▪ Review existing ordinances and control mechanisms for conformance relating to General Permit requirements ▪ Internal planning and discussion ▪ Amend or propose new ordinance language where needed	Revision of Stormwater Protection Ordinance is forecasted for the next reporting period (December 2015). Launch Laserfische application for data management relating to construction stormwater permits (NOI, NOT, CSN)
4: Post Construction	Bryan City Code Review and Updates	▪ Identify needed change to Bryan City Code with regard to federal state, and local environmental regulations and design practices	Revision of Stormwater Protection Ordinance (December 2015), procedural ordinance for Municipal Setting Designation (March/April 2016), and amendment of an ordinance addressing unimproved parking (October 2015) is forecasted for the next reporting period
4: Post Construction	Establish Post-Construction Stormwater Management Program	▪ Continuation of existing programs and focus ▪ Development written procedures for enforcement, and management mechanism for post-construction stormwater management ▪ Review data acquisition procedures and revise as necessary ▪ Track number of new development and redevelopment projects meeting MS4 monitoring requirements ▪ Evaluate long-term operation and maintenance of stormwater controls Document enforcement	Post Construction program needs significant work. Activities and BMPs may be modified. The database created this year will be used to track new and redevelopment projects meeting MS4 requirements

MCM(s)	BMP	Stormwater Activity	Description/Comments
		actions enacted	
4: Post Construction	Evaluation of Flood Control Projects	▪ Continuation of existing programs and focus ▪ Evaluate City capital improvement projects for flood control on a case-by-case basis to assess feasibility of incorporating stormwater controls to address water quality	This MCM is a continuous effort that will be performed for the remainder of the permit term
5: Pollution Prevention & Housekeeping	Municipal Facilities Identification	▪ Continue to draft facility SOPs ▪ Create inspection/assessment form	This MCM is a continuous effort that will be performed for the remainder of the permit term
5: Pollution Prevention & Housekeeping	Training for Municipal Employees	▪ Continuation of existing programs and focus ▪ Perform department-specific annual training of staff execution of the City's SWMP ▪ Complete annual multi-sector training for affected staff	This MCM is a continuous effort that will be performed for the remainder of the permit term
5: Pollution Prevention & Housekeeping	Contractor Training Oversight	▪ Revise bid and contract documents to include contractor performance requirements relating to SWMP ▪ Utilize mandatory pre-bid meetings as outreach (as necessary) ▪ Establish protocol for documenting contractor training ▪ Establish protocol for documenting poor contractor performance	Internal discussions are needed to determine the best course of action to take regarding bid and contract documents for performed services applicable to the SWMP
5: Pollution Prevention & Housekeeping	Waste Management	▪ Continuation of existing programs and focus ▪ Perform task/department-specific annual training of staff execution of the City's SWMP ▪ Draft task/facility-specific SOPs	This MCM is a continuous effort that will be performed for the remainder of the permit term

MCM(s)	BMP	Stormwater Activity	Description/Comments
5: Pollution Prevention & Housekeeping	Pesticides, Herbicides and Fertilizer Application	▪ Continuation of service	This MCM is a continuous effort that will be performed for the remainder of the permit term
5: Pollution Prevention & Housekeeping	Street Sweeping	▪ Continuation of existing programs and focus ▪ Sweep all streets at least 2 times per year; thoroughfares at least 4 times per year; city-owned parking lots 4 times per year	This MCM is a continuous effort that will be performed for the remainder of the permit term
5: Pollution Prevention & Housekeeping	Grass Clippings, Leaf Litter, and Animal Waste	▪ Continuation of existing programs and focus ▪ Review existing outreach ▪ Continuation of outreach ▪ Review legal authority and amend as necessary ▪ Enforcement of city ordinances	Revision of the Solid Waste Ordinance and Rate Resolution is forecasted for the next reporting period (November 2015) This MCM is a continuous effort that will be performed for the remainder of the permit term
5: Pollution Prevention & Housekeeping	Road and Parking Lot Maintenance	▪ Continuation of service	This MCM is a continuous effort that will be performed for the remainder of the permit term
5: Pollution Prevention & Housekeeping	Cold Weather Conditions	▪ Continuation of service	This MCM is a continuous effort that will be performed for the remainder of the permit term
5: Pollution Prevention & Housekeeping	Spill Response	▪ Continuation of existing programs and focus ▪ Review existing protocols	This MCM is a continuous effort that will be performed for the remainder of the permit term
5: Pollution Prevention & Housekeeping	WWTP Performance	▪ Continuation of existing programs and focus	This MCM is a continuous effort that will be performed for the remainder of the permit term
6: MS4 Maintenance Activities	System Repair and Maintenance	▪ Continuation of existing programs and focus ▪ Record damaged storm drain piping and schedule maintenance ▪ Investigate roadside ditches and culverts through service requests ▪ Asset management though GIS and database ▪ 20% system inlets inspected per year ▪ Clean and repair system inlets as needed ▪ Inspect all city-maintained retention and detention ponds annually	This MCM is a continuous effort that will be performed for the remainder of the permit term

MCM(s)	BMP	Stormwater Activity	Description/Comments
6: MS4 Maintenance Activities	Water Quality and Flood Control Structures	▪ Continuation of existing programs and focus ▪ Record damaged storm drain piping and schedule maintenance ▪ Investigate roadside ditches and culverts through service requests ▪ Asset management though GIS and database ▪ 20% system inlets inspected per year ▪ Clean and repair system inlets as needed ▪ Inspect all city-maintained retention and detention ponds annually	This MCM is a continuous effort that will be performed for the remainder of the permit term
6: MS4 Maintenance Activities	Floatables	▪ Continuation of existing programs and focus	This MCM is a continuous effort that will be performed for the remainder of the permit term
6: MS4 Maintenance Activities	Litter Abatement	▪ Continuation of existing programs and focus ▪ Support and participate in regional litter abatement programs (Keep Brazos Beautiful, Texas Trash Off, Big Event, etc.). ▪ Support and participate in service projects and volunteer efforts regarding illegal dumping ▪ Right-of-way litter collection by Solid Waste Assessment Workers	This MCM is a continuous effort that will be performed for the remainder of the permit term

F. SWMP Modifications (Part IV Section B.2.(e))

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:

MCM(s)	Measurable Goal(s) or BMP(s)	Implemented or Proposed Changes (Submit NOC as needed)

MCM(s)	Measurable Goal(s) or BMP(s)	Implemented or Proposed Changes (Submit NOC as needed)

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.):

G. Additional BMPs (Part IV Section B.2.(f))

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)

H. Additional Information (Part IV Section B.2.(g))

1. Is the permittee relying on another entity/ies to satisfy some of its permit obligations?

Yes No ✓

If 'Yes," provide the name(s) of other entity/ies and an explanation of their responsibilities (add more spaces or pages if needed):

2.a. Is the named permittee 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 permit numbers and permittee names (add additional spaces or pages if needed):

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

I. Construction Activities (Part IV Section B.2.(h-i))

1. The number of construction projects in the jurisdiction of the MS4 where the permittee was not the construction site operator (as provided in submittals to the MS4 operator via notices of intent or site notices 17

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

Yes No ✓

2. b. 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	

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

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): Kean Register | Title: City Manager

Signature: | Date:

Name (printed): Jayson Barfknecht, PhD, P.E. | Title: Public Works Director

Signature: | Date:

Name (printed): Paul Kaspar | Title: City Engineer

Signature: | Date:

Name (printed): Cody Cravatt | Title : Development Manager

Signature: | Date:

Name (printed): Robert Willis | Title : Streets & Drainage Supervisor

Signature: | Date:

Name (printed): Mark Jurica | Title : Treatment & Compliance Manager

Signature: | Date:

Note: 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).