

City of Woodway Storm Water Management Plan  
May 1, 2019



# Storm Water Management Plan

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City of Woodway

May 1, 2019

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**INTRODUCTION:**

As a regulated urbanized Phase II community, the City of Woodway, as the MS4, is required by the Texas Commission on Environmental Quality (TCEQ) to develop a Storm Water Management Plan (SWMP). The following plan will constitute the required SWMP. A SWMP must be developed and submitted with the NOI for eligible discharges that will reach waters of the U.S., including discharges from the regulated small MS4 to other MS4s or to privately-owned separate storm sewer systems that subsequently drain to waters of the U.S. The SWMP must include the months and years in which the permittee will undertake actions therein within the 5-year permit term, including interim milestones and the frequency of actions. Continual monitoring of the plan will occur to assure that the plan is fully implemented, to verify the impact to area storm water.

**ENDANGERED SPECIES NOD STATEMENT**

During the Water Quality Standards Review of City of Woodway TXR040253 SWMP application the following endangered aquatic or aquatic dependent species were identified in the receiving waterbodies of the MS4 as listed below:

Species	Waterbody species are in
Coffin Cave Mold beetle ( <i>Batrisodes texanus</i> ) Tooth Cave Ground Beetle ( <i>Rhadline persephone</i> )	In 1200 Brazos River Basin
Bone Cave Harvestman ( <i>Texella reyesi</i> ) Bee Creek Cave Harvestman ( <i>Texella reddelli</i> ) Navasota Ladies' - Tresses ( <i>Spiranthes parksii</i> )	

**DEFINITIONS:**

**Best Management Practices (BMPs)** - Schedules of activities, prohibitions of practices, maintenance procedures, structural controls, local ordinances, and other management practices to prevent or reduce the discharge of pollutants. BMPs also include treatment requirements, operating procedures, and practices to control runoff, spills or leaks, waste disposal, or drainage from raw material storage areas.

**Construction Site Operator** - The person or persons associated with a small or large construction project that meets either of the following two criteria:

- The entity or entities that have operational control over construction plans and specifications (including approval of revisions) to the extent necessary to meet the requirements and conditions of this general permit; or
- The entity or entities that have day-to-day operational control of those activities at a construction site that are necessary to ensure compliance with a storm water pollution prevention plan for the site or other permit conditions (e.g. they are authorized to direct workers at a site to carry out activities required by the Storm Water Pollution Prevention Plan or comply with other permit conditions).

**Discharge** - When used without a qualifier, refers to the discharge of storm water runoff or certain non-storm water discharges as allowed under the authorization of this general permit.

**Final Stabilization** - A construction site where either of the following conditions are met:

- All soil disturbing activities at the site have been completed and a uniform (e.g., evenly distributed, without large bare areas) perennial vegetative cover with a density of 70% of the native background vegetative cover for the area has been established on all unpaved areas and areas not covered by permanent structures, or equivalent permanent stabilization measures (such as the use of riprap, gabions, or geotextiles) have been employed.

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- For individual lots in a residential construction site by either:
  - The homebuilder completing final stabilization as specified in above condition; or
  - The homebuilder establishing temporary stabilization for an individual lot prior to the time of transfer of ownership of the home to the buyer and after informing the homeowner of the need for, and benefits of, final stabilization.
- For construction activities on land used for agricultural purposes (e.g. pipelines across crop or range land), final stabilization may be accomplished by returning the disturbed land to its preconstruction agricultural use. Areas disturbed that were not previously used for agricultural activities, such as buffer strips immediately adjacent to a surface water and areas which are not being returned to their preconstruction agricultural use must meet the final stabilization conditions of condition above.

**Illicit Connection** - Any man-made conveyance connecting an illicit discharge directly to a municipal separate storm sewer.

**Illicit Discharge** - Any discharge to a municipal separate storm sewer that is not entirely composed of storm water, except discharges pursuant to this general permit or a separate authorization and discharges resulting from emergency fire-fighting activities.

**Large Construction Activity** - Construction activities including clearing, grading, and excavating that result in land disturbance of equal to or greater than five (5) acres of land. Large construction activity also includes the disturbance of less than five (5) acres of total land area that is part of a larger common plan of development or sale if the larger common plan will ultimately disturb equal to or greater than five (5) acres of land. Large construction activity does not include routine maintenance that is performed to maintain the original line and grade, hydraulic capacity, and original purpose of a ditch, channel, or other similar storm water conveyance. Large construction activity does not include the routine grading of existing dirt roads, asphalt overlays of existing roads, the routine clearing of existing rights-of-way, and similar maintenance activities.

**Maximum Extent Practicable (MEP)** - The technology-based discharge standard for municipal separate storm sewer systems to reduce pollutants in storm water discharges that was established by CWA • 402(p). A discussion of MEP as it applies to small MS4s is found at 40 CFR. 122.34.

**Notice of Change (NOC)** - Written notification from the permittee to the executive director providing changes to information that was previously provided to the agency in a notice of intent.

**Outfall** - For the purpose of this permit, a point source at the point where a municipal separate storm sewer discharges to waters of the United States (U.S.) and does not include open conveyances connecting two municipal separate storm sewers, or pipes, tunnels, or other conveyances that connect segments of the same stream or other waters of the U.S. and are used to convey waters of the U.S. For the purpose of this permit, sheet flow leaving a linear transportation system without channelization is not considered an outfall. Point sources such as curb cuts; traffic or right-of-way barriers with drainage slots that drain into open culverts, open swales or an adjacent property, or otherwise not actually discharging into waters of the U.S. are not considered an outfall.

**Redevelopment** - Alterations of a property that changed the footprint of a site or building in such a way that there is a disturbance of equal to or greater than one (1) acre of land. This term does not include such activities as exterior remodeling, routine maintenance activities, and linear utility installation.

**Small Construction Activity** - Construction activities including clearing, grading, and excavating that result in land disturbance of equal to or greater than one (1) acre and less than five (5) acres of land. Small construction activity also includes the disturbance of less than one (1) acre of total land area that is part of a larger common plan of development or sale if the larger common plan will ultimately disturb equal to or greater than one (1) and less than five (5) acres of land. Small construction activity does not include routine maintenance that is performed to maintain the original line and grade hydraulic capacity, and original purpose of a ditch, channel, or other similar storm water conveyance. Small construction activity does not include the routine grading of existing dirt roads, asphalt overlays

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of existing roads, the routine clearing of existing rights-of way, and similar maintenance activities.

**Small Municipal Separate Storm Sewer System (MS4)** - refers to a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains): (i) Owned or operated by the United States, a state, city, town, borough, county, district, association, or other public body (created by or pursuant to state law) having jurisdiction over disposal of sewage, industrial wastes, storm water, or other wastes, including special districts under state law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under 208 of the CWA; (ii) Designed or used for collecting or conveying storm water; (iii) Which is not a combined sewer; (iv) Which is not part of a publicly owned treatment works (POTW) as defined at 40 CFR • 122.2; and (v) Which was not previously authorized under a NPDES or TPDES individual permit as a medium or large municipal separate storm sewer system, as defined at 40 CFR §§ 122.26(b)(4) and (b)(7). This term includes systems similar to separate storm sewer systems at military bases, large hospital or prison complexes, and highways and other thoroughfares. This term does not include separate storm sewers in very discrete areas, such as individual buildings. For the purpose of this permit, a very discrete system also includes storm drains associated with certain municipal offices and education facilities serving a nonresidential population, where those storm drains do not function as a system, and where the buildings are not physically interconnected to an MS4 that is also operated by that public entity.

**Storm Water and Storm Water Runoff** - Rainfall runoff, snow melt runoff, and surface runoff and drainage.

**Storm Water Associated with Construction Activity** - Storm water runoff from an area where there is either a large construction activity or a small construction activity.

**Storm Water Management Program (SWMP)** - A comprehensive program to manage the quality of discharges from the municipal separate storm sewer system.

**Structural Control (or Practice)** - A pollution prevention practice that requires the construction of a device, or the use of a device, to capture or prevent pollution in storm water runoff. Structural controls and practices may include but are not limited to: wet ponds, bio-retention, infiltration basins, storm water wetlands, silt fences, earthen dikes, drainage swales, vegetative lined ditches, vegetative filter strips, sediment traps, check dams, subsurface drains, storm drain inlet protection, rock outlet protection, reinforced soil retaining systems, gabions, and temporary or permanent sediment basins.

**Waters of the United States** - (from 40 CFR • 122.2) Waters of the United States or waters of the U.S. means:

- All waters which are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
- All interstate waters, including interstate wetlands;
- All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, play lakes, or natural ponds that the use, degradation, or destruction of which would affect or could affect interstate or foreign commerce including any such waters:
  - Which are or could be used by interstate or foreign travelers for recreational or other purposes;
  - From which fish or shellfish are or could be taken and sold in interstate or foreign commerce; or
  - Which are used or could be used for industrial purposes by industries in interstate commerce;
- All impoundments of waters otherwise defined as waters of the United States under this definition;
- Tributaries of waters as identified in the paragraphs above;

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- The territorial sea; and
- Wetlands adjacent to waters (other than waters that are themselves wetlands) as identified above

**Waste treatment systems**, including treatment ponds or lagoons designed to meet the requirements of CWA (other than cooling ponds as defined in 40 CFR .423.11 (m) which also meet the criteria of this definition) are not waters of the United States. This exclusion applies only to manmade bodies of water which neither were originally created in waters of the United States (such as disposal area in wetlands) nor resulted from the impoundment of waters of the United States. Waters of the United States do not include prior converted cropland. Notwithstanding the determination of an area's status as prior converted cropland by any other federal agency, for the purposes of the Clean Water Act, the final authority regarding Clean Water Act jurisdiction remains with EPA.

**COMMONLY USED ACRONYMS:**

BMP:	Best Management Practice
CFR:	Code of Federal Regulations
CGP:	Construction General Permit, TXR150000
CWA:	Clean Water Act
DMR:	Discharge Monitoring Report
EPA:	Environmental Protection Agency
FR:	Federal Register
IP:	Implementation Procedures
MCM:	Minimum Control Measure
MSGP:	Multi-Sector General Permit, TXR050000
MS4:	Municipal Separate Storm Sewer System
NOC:	Notice of Change
NOD:	Notice of Deficiency
NOI:	Notice of Intent
NOT:	Notice of Termination (to terminate coverage under a general permit)
NPDES:	National Pollutant Discharge Elimination System
SWMP:	Storm Water Management Program
SWP3:	Storm Water Pollution Prevention Plan
TAC:	Texas Administrative Code
TCEQ:	Texas Commission on Environmental Quality
TPDES:	Texas Pollutant Discharge Elimination System
TWC:	Texas Water Code

**CONTROL MEASURES:**

**1. Public Education, Outreach, and Involvement**

The City of Woodway shall develop, implement, and maintain a comprehensive stormwater education and outreach program to educate public employees, businesses, and the general public of hazards associated with the illegal discharges and improper disposal of waste and about the impact that stormwater discharges can have on local waterways, as well as the steps that the public can take to reduce pollutants in stormwater. A public education program shall be developed and implemented to distribute educational materials to the community or conduct equivalent outreach activities that will be used to inform the public.

- A. The Public Education and Outreach program will, at a minimum:
- Define the goals and objectives of the program based on high-priority, community-wide issues
  - Identify the target audience(s);
  - Develop or utilize appropriate educational materials, such as printed materials and websites;
  - Determine cost effective and practical methods and procedures for distribution of materials.

**The following BMP's were deemed effective by previously developed SWMPs and will continue to be administered:**

- Promotion of water conservation practices through articles placed in a public newsletter at least once annually.
- Development of free stormwater education pamphlets and resource material available to the public at City offices.
- Informational stormwater article placed on the city-maintained website available to the public.
- Promotion of stormwater protocols through articles placed in a public newsletter at least once annually.
- A stormwater drain inlet stenciling program was 100% completed and will continue to be implemented as the SW system expands.

**The following BMP's will be developed and implemented for Public Outreach during this 5-year permit period:**

**BMP:** Stormwater education materials for restaurant owners:

**Measurable Goal:** Develop a targeted mailing for local restaurants regarding proper Fat/Oil/Grease (FOG) disposal and recycling. The targeted letter will be developed by December 2020 and be sent to 100% of Woodway restaurant owners annually.

**BMP:** Public education on stormwater:

**Measurable Goal:** Promote a local Master Gardner's program that educates the public through at least one annual article placed in a community newsletter starting by December 2021. 100% of the newsletters distributed will be tracked by receipt.

**BMP:** Public education on benefits of recycling:

**Measurable Goal:** Promote a recycling service and large-item pickup to the public through at least one annual article placed in a community newsletter starting by December 2022. 100% of the newsletters distributed will be tracked by receipt.

B. The Public Involvement program will, at a minimum:

- Consider using public input
- Create opportunities for citizens to participate in the implementation of control measures
- Ensure the public can easily find information about the SWMP

**The following BMP's will be developed and implemented for Public Involvement during this 5-year permit period:**

**BMP:** Hold public meetings on proposed program:

**Measurable Goal:** Public hearings will be held as often as required by state law or as the public input may indicate as appropriate. 100% of the hearings will be part of the public record and shall begin immediately.

**BMP:** Public participation in local event:

**Measurable Goal:** The City of Woodway will host at least one Park Clean-Up event per year for the public starting by December 2020. The number of volunteers and amount of removed debris will be recorded.

**BMP:** SWMP accessibility

**Measurable Goal:** The approved SWMP will be uploaded to the City's website ([www.woodwaytexas.gov](http://www.woodwaytexas.gov)) by December 2020

**2. Illicit Discharge Detection and Elimination (IDDE)**

The City of Woodway shall develop, implement, and enforce a program to detect, investigate, and eliminate illicit discharges into the small MS4. The program must include a plan to detect and address non-stormwater discharges, including illegal dumping to the MS4 system. Non-storm water flows listed in the Environmental Protection Agencies rules and in the general permit issued by the TCEQ and identified as allowable discharges shall not be considered as an illicit discharge requiring elimination. All unknown discharges and those discharges listed in City Ordinance Chapter 18-2.82 (below) shall be reviewed on a case-by-case basis and abated if the discharge is determined to contribute a significant source of pollutants

*Sec. 18-2.82. - Prohibited discharges.*

- (a) *No person may discharge or cause to be discharged onto land or into non-sewer waters or any watercourse any of the following substances: (1) All waste, wastewater, or other substances containing phenols, unionized hydrogen sulfide, or other taste-producing and odor-producing substances which do not conform to concentration limits established by appropriate regulatory agencies; (2) Any substance constituting a health hazard to humans or animals, or that otherwise creates a health hazard or is physically harmful to non-sewer waters; (3) Chemical discharges; (4) Garbage, whether properly shredded or not; (5) Grease; (6) Groundwater; (7) Hazardous metal or heavy metals and toxic materials; (8) Industrial waste; (9) Medical waste, isolation waste, infectious agents, human blood and blood byproducts, pathological wastes, sharps, body parts, fomites, etiologic agents, contaminated bedding, surgical wastes, potentially contaminated laboratory wastes and dialysis wastes; (10) Normal domestic wastewater; (11) Automotive oil, petroleum oil and other petroleum products, non-biodegradable cutting oil, or products of mineral oil origin; (12) Pollutants; (13) Radioactive waste; (14) Sewage; (15) Slug or slug load; (16) Subsurface drainage; (17) Surface water; (18) Suspended solids; (19) Synthetics of the substances listed under this section; (20) Untreated wastewater; (21) Waste; (22) Other waste characterized as hazardous, toxic, or harmful by local, state, or federal rules, statutes and regulations.*

The IDDE program must include the following:

- An updated MS4 map, including the following information:
  - Location of all outfalls operated by the MS4 and that discharge into waters of the US, and
  - Names & locations of all surface waters receiving discharge from the MS4 outfalls
- Methods for informing and training MS4 field staff
- Procedures for tracing and removing the source on an illicit discharge

**The following BMP's will be developed and implemented for IDDE during this 5-year permit period:**

**BMP:** Storm drain system map

**Measurable Goal:** Modify the existing MS4 map to illustrate new additions to storm system and upgrade to a digital format by December of 2024

**BMP:** Identify illicit connections or non-stormwater discharges through dry weather screening and inspections

**Measurable Goal:** The Woodway Streets Department will conduct dry weather inspections of 20% of storm drain inlets per year starting in 2019 to identify non-stormwater discharges within the system until 100% of the inlets have been cataloged per the permit period. Service orders will be tracked through the city's current software

**BMP:** Sanitary Sewer Overflow (SSO) detection and maintenance

**Measurable Goal:** As part of a previously administered SSOI, the City of Woodway has identified potential areas that could contribute to wastewater overflows. A minimum of 20% of these areas will be treated annually, starting 2019 through acid treatments and will be tracked monthly by service orders until 100% of the identified areas are treated. Significant blockages will be tracked by service order and mechanically removed immediately when observed or reported in these areas.

**BMP:** Public Reporting

**Measurable Goal:** The City of Woodway will investigate public reports of illicit discharges/illegal dumping and respond with appropriate action for cleanup and/or enforcement within 7 calendar days of initial contact. A service order system will track complaints and corrective actions beginning 2019 and continue through the permit period.

**3. Construction Site Storm Water Runoff Control**

The City of Woodway shall develop, implement, and enforce a program (in conjunction with existing ordinances listed below) requiring separately permitted operators of small and large construction activities, to select, install, implement, and maintain stormwater control measures that prevent illicit discharges to the MEP. The program must include the development and implementation of an ordinance or other regulatory mechanism, as well as sanctions to ensure compliance to the extent allowable under state, federal, and local law, to require erosion and sediment control.

- Ordinance #4.1 Plumbing Code
- Ordinance # 18-2.81 through 18-2.94
- Ordinance #16.3 Runoff of dirt, sand, gravel, caliche or mud on to public property prohibited.
- Section 17-24.5 (F) (3) Soil Erosion Control Plans
- Appendix A-Zoning Sec. 2.1010 Grading and Drainage
- Appendix A-Zoning Sec. 2.1011 Erosion and Sedimentation Control

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(A) Requirements for Permittees

The City of Woodway shall ensure that operators managing small and large construction activities discharging to the small MS4 have developed and implemented a stormwater pollution prevention plan (SWP3) in accordance with the TPDES CGP TXR150000. Requirements for construction site contractors to, at a minimum:

- Implement appropriate erosion and sediment control BMPs
- Control waste such as discarded building materials, concrete truck washout water, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality.
- Demonstrate compliance with TPDES construction general permit through providing a SWPPP to local authorities before construction activity is begun.

(B) Prohibited Discharges

- Wastewater from concrete washout and well drilling operations (unless managed with appropriate controls)
- Wastewater from washout and cleanout of stucco, paint, from release oils or other construction materials
- Fuels, oils or other pollutants used in vehicle/equipment operation or maintenance
- Soaps or solvents used in vehicle/equipment washing
- Discharges from dewatering activities unless managed by appropriate BMPs

(C) Construction Plan Review Procedures

The City of Woodway shall continue to maintain and implement site plan review procedures that describe which plans will be reviewed as well as when an operator may begin construction. The site plan procedures will meet the following minimum requirements:

- Site plan review which incorporates consideration of potential water quality impacts;
- Contains appropriate site-specific construction site control measures or is developed pursuant to the TPDES CGP, TXR150000 (such as a SWPPP)

(D) Construction Site Inspections and Enforcement

The City of Woodway shall continue to visually inspect large and small construction projects. The city shall conduct inspections based on the evaluation of factors that are a threat to water quality, such as: soil erosion potential; site slope; project size and type; sensitivity of receiving waterbodies; proximity to receiving waterbodies; non-stormwater discharges; and past record of non-compliance by the operators of the construction site. Inspections will occur during the active construction phase and be performed by the building official or other designee. The City of Woodway shall develop and implement updated written procedures outlining the inspection and enforcement requirements. Inspections of construction sites will include the following:

- Determine whether the site has appropriate coverage under the TPDES CGP, TXR150000 (SWPPP). If no coverage exists, notify the permittee of the need for permit coverage
- Conduct a minimum of one site inspection during construction or when requested by public complaint to determine if control measures have been selected, installed, implemented, and maintained according to the small MS4's requirements
- Assess compliance with the permittee's ordinances and other regulations

- Provide a written or electronic inspection report.

Based on site inspection findings, The City shall take all necessary follow-up actions (for example, follow-up inspections or enforcement) to ensure compliance with permit requirements and this SWMP. These follow-up and enforcement actions should be tracked through the city's current computer software and made available for review by the TCEQ.

**The following BMP's will be developed and implemented for Construction Site Control during this 5-year permit period:**

**BMP:** Contractor acknowledgment of construction permit suspension

**Measurable Goal:** The City of Woodway will develop a waiver or language on construction permits to be signed by contractors/operators (disturbing sites greater than or equal to one acre) acknowledging the suspension of a construction permit if the requirements of an approved SWPPP are not maintained/functioning properly resulting in an illicit discharge. The waiver/permit requirements will be developed by December 2021.

**BMP:** Schedule construction site inspections

**Measurable Goal:** The Woodway Inspections Departments will conduct a minimum of three scheduled site inspections for all new construction projects effecting sites one acre or larger starting no later than December of 2020. Inspection checklists will be tracked during the permit period through the city's current computer software.

**4. Post-Construction Storm Water Management in New Development and Redevelopment**

The City of Woodway shall develop, implement, and enforce a program, to the extent allowable under state, federal, and local law, to control stormwater discharges from new development and redeveloped sites that discharge into the small MS4 that disturb one acre or more, including projects that disturb less than one acre that are part of a larger common plan of development or sale. The program must be established for private and public development sites. The program may utilize an offsite mitigation and payment in lieu of components to address this requirement. Program elements must be fully implemented by the end of this permit term.

Woodway (as the MS4) shall use, to the extent allowable under state, federal, and local law and local development standards, an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment project. The City of Woodway will require that owners or operators of new development and redeveloped sites design, install, implement, and maintain a combination of structural and non-structural BMPs appropriate for the community and that protects water quality. The City of Woodway will be responsible to annually review and update as necessary, the SWMP and MCM implementation procedures required by the general permit. Any changes must be included in the annual report. Woodway will document and maintain records of enforcement actions and make them available for review by the TCEQ.

Long-term maintenance of post-construction stormwater control measures can be administrated through one or both of the following approaches:

- Maintenance performed by the permitted MS4; or
- Maintenance performed by the owner or operator of a new development or redeveloped site under a maintenance plan.

**The following BMP's will be developed and implemented for Post-Construction Stormwater Management during this 5-year permit period:**

**BMP:** Draft a post-construction stormwater management ordinance

**Measurable Goal:** The Department of Community Services will draft an ordinance requiring private property owners to maintain any required detention structures by December of 2019.

**BMP:** Address final stabilization of non-residential projects

**Measurable Goal:** The Department of Community Services will verify that at least 80% of non-residential projects will reach final stabilization no later than 30 days after completion of the project or issuance of the certificate of occupancy by December of 2024.

### **5. Pollution Prevention/Good Housekeeping for Municipal Operations**

The City of Woodway shall develop and implement an operation and maintenance program, including an employee training component that has the ultimate goal of preventing or reducing pollutant runoff from municipal activities and municipally owned areas including but not limited to park and open space maintenance; street, road, or highway maintenance; fleet and building maintenance; stormwater system maintenance; new construction and land disturbances; municipal parking lots; vehicle and equipment maintenance and storage yards; waste transfer stations; and salt/sand storage locations. Elements included in this SWMP must be fully implemented by the end of this permit term. The program shall contain the following six elements for compliance:

#### (A) Permittee-owned Facilities and Control Inventory

Woodway shall maintain an inventory of facilities and stormwater controls that it owns and operates within the regulated area of the small MS4. The inventory must be available for review by TCEQ and must include, but is not limited to, the following as applicable:

- Equipment storage and maintenance facilities
- Fuel storage facilities
- Materials storage yards
- Pesticide storage facilities
- Buildings, including schools, libraries, police stations, fire stations, and office buildings
- Parking lots
- Public works yards
- Street repair and maintenance sites
- Vehicle storage and maintenance yards
- Structural stormwater controls

#### **The following BMP's will be developed and implemented for Pollution Prevention/Good Housekeeping for Municipal Operations during this 5-year permit period:**

**BMP:** Update facility map

**Measurable Goal:** The current map only illustrates locations of city-owned parcels. By the end of this permit term (December 2024) an updated map indicating property addresses, description of facility, and brief description of operations performed at each property will be completed.

#### (B) Training and Education

The City of Woodway shall inform or train appropriate employees involved in implementing pollution prevention and good housekeeping practices. All permittees shall maintain a training attendance list for inspection by TCEQ when requested.

#### **The following BMP's will be developed and implemented for Pollution Prevention/Good Housekeeping for Municipal Operations during this 5-year permit period:**

**BMP:** Employee Training

**Measurable Goal:** A minimum of once a year, starting 2020, public-works employees responsible for the municipal operations will attend a management discussion involving prevention and reduction of storm water pollution from municipal operations. Materials may be internally developed, or obtained from the EPA, states, or other organizations and sources.

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(C) Disposal of Waste Material

Waste materials removed from the small MS4 must be disposed of in accordance with 30 TAC Chapters 330 or 335, as applicable.

**The following BMP's will be developed and implemented for Pollution Prevention/Good Housekeeping for Municipal Operations during this 5-year permit period:**

**BMP:** Catalog volume of properly disposed waste

**Measurable Goal:** Starting immediately and continuing throughout the permit term, the City of Woodway will verify 100% of the volume of waste is properly disposed of from the city's main public works facility

(D) Contractor Requirements and Oversight

Any contractors hired by the City of Woodway to perform maintenance activities on city-owned facilities must be required to comply with all of the stormwater control measures, good housekeeping practices, and facility-specific stormwater management operating procedures described in the general permit. The City of Woodway shall provide oversight of contractor activities to ensure that contractors are using appropriate control measures when applicable.

(E) Municipal Operation and Maintenance Activities

The City of Woodway shall evaluate operation and maintenance (O&M) activities for their potential to discharge pollutants in stormwater (for example, metals; chlorides; hydrocarbons such as benzene, toluene, ethyl benzene, and xylenes; sediment; and trash). Those activities include but are not limited to:

- Road and parking lot maintenance, including such areas as pothole repair, pavement marking, sealing, and re-paving;
- Cold weather operations, including plowing, sanding, and application of deicing and anti-icing compounds and maintenance of snow disposal areas; and
- Right-of-way maintenance, including mowing, herbicide and pesticide application, and planting vegetation

**The following BMP's will be developed and implemented for Pollution Prevention/Good Housekeeping for Municipal Operations during this 5-year permit period:**

**BMP:** Develop spill prevention and control plans for city-owned facilities

**Measurable Goal:** Develop plans describing spill prevention and control procedures by December 2022

**BMP:** Training program for grounds maintenance and landscaping crews

**Measurable Goal:** Develop a pollution prevention workshop for all city employees responsible for grounds maintenance and landscaping at public facilities to begin by December 2024. Once per year, hold a workshop for new employees and crew managers.

**BMP:** Facility Inspections

**Measurable Goal:** Starting immediately and continuing throughout the permit term, the City of Woodway Inspections Department will visually inspect 100% of identified city-owned facilities a minimum of once a year to identify activities that can potentially discharge pollutants into the storm-water system, and will evaluate better alternatives to reduce pollutants during the permit term. A log of inspections will be maintained and made available for review by the TCEQ upon request.

(F) Structural Control Maintenance

If BMPs include structural controls, maintenance of the controls must be performed by the City of Woodway and consistent with maintaining the effectiveness of the BMP. Housekeeping measures and BMPs shall be identified and implemented with the goal of preventing or reducing pollutant runoff from municipal operations.

**Summary of Best Management Practices for 2019-2024 Permit Term:**

1. **BMP:** Hold public meetings on proposed program:  
**Measurable Goal:** Public hearings will be held as often as required by state law or as the public input may indicate as appropriate. 100% of the hearings will be part of the public record and shall begin immediately.
2. **BMP:** Catalog volume of properly disposed waste  
**Measurable Goal:** Starting immediately and continuing throughout the permit term, the City of Woodway will verify 100% of the volume of waste is properly disposed of from the city's main public works facility
3. **BMP:** Facility Inspections  
**Measurable Goal:** Starting immediately and continuing throughout the permit term, the City of Woodway Inspections Department will visually inspect 100% of identified city-owned facilities a minimum of once a year to identify activities that can potentially discharge pollutants into the storm-water system, and will evaluate better alternatives to reduce pollutants during the permit term. A log of inspections will be maintained and made available for review by the TCEQ upon request.
4. **BMP:** Identify illicit connections or non-stormwater discharges through dry weather screening and inspections  
**Measurable Goal:** The Woodway Streets Department will conduct dry weather inspections of 20% of storm drain inlets per year starting in 2019 to identify non-stormwater discharges within the system until 100% of the inlets have been cataloged per the permit period. Service orders will be tracked through the city's current software
5. **BMP:** Sanitary Sewer Overflow (SSO) detection and maintenance  
**Measurable Goal:** As part of a previously administered SSOI, the City of Woodway has identified potential areas that could contribute to wastewater overflows. A minimum of 20% of these areas will be treated annually, starting 2019 through acid treatments and will be tracked monthly by service orders until 100% of the identified areas are treated. Significant blockages will be tracked by service order and mechanically removed immediately when observed or reported in these areas
6. **BMP:** Public Reporting  
**Measurable Goal:** The City of Woodway will investigate public reports of illicit discharges/illegal dumping and respond with appropriate action for cleanup and/or enforcement within 7 calendar days of initial contact. A service order system will track complaints and corrective actions beginning 2019 and continue through the permit period
7. **BMP:** Draft a post-construction stormwater management ordinance  
**Measurable Goal:** The Department of Community Services will draft an ordinance requiring private property owners to maintain any required detention structures by December of 2019.
8. **BMP:** Public participation in local event:  
**Measurable Goal:** The City of Woodway will host at least one Park Clean-Up event per year for the public starting by December 2020. The number of volunteers and amount of removed debris will be recorded.
9. **BMP:** SWMP accessibility  
**Measurable Goal:** The approved SWMP will be uploaded to the City's website ([www.woodwaytexas.gov](http://www.woodwaytexas.gov)) by December 2020
10. **BMP:** Schedule construction site inspections  
**Measurable Goal:** The Woodway Inspections Departments will conduct a minimum of three scheduled site inspections for all new construction projects effecting sites one acre or larger starting no later than December of 2020. Inspection checklists will be tracked during the permit period. Inspection checklists will be tracked during the permit period through the city's current computer software.
11. **BMP:** Employee Training  
**Measurable Goal:** A minimum of once a year and starting in 2020, public-works employees responsible for the municipal operations will attend a management discussion involving preventing and reducing storm water pollution from municipal operations. Materials may be internally developed, or obtained from the EPA, states, or other organizations and sources.

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12. **BMP:** Public education on stormwater:  
**Measurable Goal:** Promote a local Master Gardner’s program that educates the public through at least one annual article placed in a community newsletter starting by December 2021. 100% of the newsletters distributed will be tracked by receipt.
13. **BMP:** Contractor acknowledgment of construction permit suspension  
**Measurable Goal:** The City of Woodway will develop a waiver or language on construction permits to be signed by contractors/operators (disturbing sites greater than or equal to one acre) acknowledging the suspension of a construction permit if the requirements of an approved SWPPP are not maintained/functioning properly resulting in an illicit discharge. The waiver/permit requirements will be developed by December 2021.
14. **BMP:** Public education on benefits of recycling:  
**Measurable Goal:** Promote a recycling service and large-item pickup to the public through at least one annual article placed in a community newsletter starting by December 2022. 100% of the newsletters distributed will be tracked by receipt.
15. **BMP:** Develop spill prevention and control plans for city-owned facilities  
**Measurable Goal:** Develop plans describing spill prevention and control procedures by December 2022
16. **BMP:** Stormwater education materials for restaurant owners:  
**Measurable Goal:** Develop a targeted mailing for local restaurants regarding proper Fat/Oil/Grease (FOG) disposal and recycling. The targeted letter will be developed by December 2023 and be sent to 100% of Woodway restaurant owners annually.
17. **BMP:** Storm drain system map  
**Measurable Goal:** Modify the existing MS4 map to illustrate new additions to storm system and upgrade to a digital format by December of 2024
18. **BMP:** Address final stabilization of non-residential projects  
**Measurable Goal:** The Department of Community Services will verify that at least 80% of non-residential projects will reach final stabilization no later than 30 days after completion of the project or issuance of the certificate of occupancy by December of 2024.
19. **BMP:** Update facility map  
**Measurable Goal:** The current map only illustrates locations of city-owned parcels. By the end of this permit term (December 2024) an updated map indicating property addresses, description of facility, and brief description of operations performed at each property will be completed
20. **BMP:** Training program for grounds maintenance and landscaping crews  
**Measurable Goal:** Develop a pollution prevention workshop for all city employees responsible for grounds maintenance and landscaping at public facilities to begin by December 2024. Once per year, hold a workshop for new employees and crew managers.