



January 20, 2022

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

Re: Phase II MS4 Annual Report Transmittal for City of Benbrook
TPDES Permit Number: TXR040083
Year 3 Report

Dear Team Leader:

This letter serves to transmit the 2021 Annual Report for the Texas Pollutant Discharge Elimination System (TPDES) Small Municipal Separate Storm Sewer System (MS4) General Permit, Authorization Number TXR04083 for the City of Benbrook.

The annual report is for Year 3. The reporting period's beginning 12/13/2020 and ending 12/12/2021.

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

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

Sincerely,

A handwritten signature in black ink that reads "Bennett C. Howell, III".

Bennett C. Howell, III, PE, CFM
Public Services Director

Cc: TCEQ – Fort Worth

Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number TXR040000

A. General Information

Authorization Number: TXR040083

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

Annual Reporting Year Option Selected by MS4:

Calendar Year: 2021

Permit Year: _____

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

Reporting period beginning date: (month/date/year) 12/13/2020

Reporting period end date: (month/date/year) 12/12/2021

MS4 Operator Level: Phase II Traditional Small Name of MS4: City of Benbrook

Contact Name: Bennett Howell Telephone Number: 817-249-6063

Mailing Address: 911 Winscott Road, Benbrook, Texas 76126

E-mail Address: bhowell@benbrook-tx.gov

A copy of the annual report was submitted to the TCEQ Region: YES X
NO ___ Region the annual report was submitted to: TCEQ Region 4

B. Status of Compliance with the MS4 GP and SWMP

1. Provide information on the status of complying with permit conditions:
(TXR040000 Part IV.B.2)

	Yes	No	Explain
Permittee is currently in compliance with the SWMP as submitted to and approved by the TCEQ.	X		TCEQ audit 08.27.20 and subsequent letter
Permittee is currently in compliance with recordkeeping and reporting requirements.	X		TCEQ audit 08.27.20 and subsequent letter

Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.).	X		TCEQ audit 08.27.20 and subsequent letter
Permittee conducted an annual review of its SWMP in conjunction with preparation of the annual report	X		Staff reviewed the plan and prepared the annual report based on the review.

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

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
1: Public Education, Outreach and Involvement	Distribute materials on lawn management, waste disposal, littering and other stormwater related issues.	No. This BMP does not result in a direct reduction of pollutants, educating citizens will eventually reduce discharges to the stormwater system.
1: Public Education, Outreach and Involvement	Comply with all federal, state, and local public notice requirements when implementing the SWMP.	No. This BMP does not result in a direct reduction of pollutants, educating citizens will eventually reduce discharges to the stormwater system.
2: Illicit Discharge Detection and Elimination	Evaluate existing stormwater ordinances that prohibit non-stormwater discharges into MS4	Yes. This BMP will reduce the discharge or pollutants to the MS4 through enforcement and education.
2: Illicit Discharge Detection and Elimination	Storm System Mapping	Yes. This BMP will help reduce pollutants in the MS4 by verifying stormwater system status and checking for illegal connections.

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
2: Illicit Discharge Detection and Elimination	Review existing program to detect, track and eliminate illicit discharges	Yes. There is an increase in illegal discharge detection through screening.
2: Illicit Discharge Detection and Elimination	Field Staff Training	Yes. The more educated the staff are in regards to the SWMP, the better they can identify issues.
3: Construction Site Stormwater Runoff Control	Construction Site Stormwater Control Ordinances	Yes. Stormwater runoff from construction sites is reduced.
3: Construction Site Stormwater Runoff Control	Construction Plan Review	Yes. Stormwater runoff from construction sites is reduced when stormwater management plans are reviewed prior to the start of construction.
4: Post-Construction Stormwater Management in New Development and Redevelopment	Development Plan Review	Yes. Stormwater runoff from construction sites is reduced when post-construction stormwater management plans are reviewed prior to the start of construction.
5: Pollution Prevention/Good Housekeeping for Municipal Operations	Employee Training	Yes. A better trained staff will operate the MS4 more efficiently.
5: Pollution Prevention/Good Housekeeping for Municipal Operations	Street Sweeping	Yes. Street sweeping reduces pollutants from the MS4 by removing the materials from the streets prior to being discharged into the MS4.

3. Describe progress towards achieving the goal of reducing the discharge of pollutants to the MEP. If no progress was made or the BMP did not result in a reduction in pollutants, provide an explanation. Use the table below to meet this requirement (**see Example 2 in instructions**):

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
1	1.1 Educate Residents	Flyers and other handouts	200	Brochures and Newsletter	No. Though this BMP does not result in a direct reduction of pollutants, educating citizens will eventually reduce litter, hence pollutants.
1	1.4 Public Notice in Development of SWMP	Newspaper	1	Publication in Local Newspaper and Post Annual Reports on Website	No. This BMP does not result in a direct reduction of pollutants, educating citizens will eventually reduce discharges to the stormwater system.
2	2.7 Illicit Discharge Ordinances	Ordinances	1	Annual Review	Yes. This BMP will reduce the discharge or pollutants to the MS4 through enforcement and education.

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
2	2.8 Storm System Mapping	Construction	1	Annual Review	Yes. This BMP will help reduce pollutants in the MS4 by verifying stormwater system status and checking for illegal connections.
2	2.9 Detection and Elimination Program	Construction	1	Annual Review	Yes. There is an increase in illegal discharge detection through screening.
2	2.10 Field Staff Training	Training	2	Training events	Yes. The more educated the staff are in regards to the SWMP, the better they can identify issues.
3	3.14 Construction Site Stormwater Runoff Control Ordinances	Review	1	Annual Review	Yes. Stormwater runoff from construction sites is reduced.
3	3.15 Construction Plan Review	Review	5	Review new construction plans submitted by developers	Yes. Stormwater runoff from construction sites is reduced when stormwater management plans are reviewed prior to the start of construction.

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
4	4.21 Development Plan Review	Review	10	Review new development plans submitted by developers	Yes. Stormwater runoff from construction sites is reduced when post-construction stormwater management plans are reviewed prior to the start of construction.
5	5.24 MS4 Employee Training	Review	1	Annual Review of Materials	Yes. A better trained staff will operate the MS4 more efficiently.
5	5.25 Street Sweeping	Street Sweeper Schedule	Each street swept 4 times per year	Quarterly	Yes. Street sweeping reduces pollutants from the MS4 by removing the materials from the streets prior to being discharged into the MS4.

4. Provide the measurable goals for each of the MCMs, and an evaluation of the success of the implementation of the measurable goals (**see Example 3 in instructions**):

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
1	Provide brochures and an annual newsletter article relating to stormwater management.	Met. The City has brochures available at City Hall and City-Sponsored Events. Provided 3 articles in the City newsletter relating to stormwater management topics. 13,000 newsletters are mailed out every other month for six publications per year.
1	Provide Household Hazardous Waste and eWaste/Paper Shred events	Met. City held one HHW and one eWaste/Paper Shred event in 2021.
1	Annual Reports Available on Website	Met. The annual report is posted on the City's website.
2	Illicit Discharge Ordinances	Met. Reviewed illicit discharge ordinance and no changes were made.
2	Stormwater System Mapping	Met. Stormwater system map and GIS system were reviewed and updated as new systems were constructed.
2	Review existing detection and elimination program	Met. The current program was reviewed and no changes were made.
2	Field Staff Training	Met. Two training events were held with field staff that have the potential to encounter or respond to illicit discharges.
3	Construction Site Stormwater Runoff Control Ordinances	Met. Reviewed current ordinances and no changes were made.
3	Construction Plan Review	Met. Reviewed 5 construction plans submitted by developer.
4	Development Plan Review	Met. Reviewed 10 development plans for stormwater related issues.

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
5	Employee Training	Met. Provided training to City staff involved in stormwater management.
5	Street Sweeping	Exceeded. Goal is to sweep all streets on a quarterly basis and the City was able to sweep the streets 7 times in 2021.

C. Stormwater Data Summary

Provide a summary of all information used, including any lab results (if sampling was conducted) to assess the success of the SWMP at reducing the discharge of pollutants to the MEP. For example, did the MS4 conduct visual inspections, clean the inlets, look for illicit discharge, clean streets, look for flow during dry weather, etc.?

The City conducts dry weather screening as part of the Illicit Discharge and Detection Program. The City has 115 outfalls and 24 outfalls were sampled in 2021. A list of sample locations and example results sheet is attached.

D. Impaired Waterbodies

1. Identify whether an impaired water within the permitted area was added to the latest EPA-approved 303(d) list or the Texas Integrated Report of Surface Water Quality for CWA Sections 305(b) and 303(d). List any newly-identified impaired waters below by including the name of the water body and the cause of impairment.

Stormwater discharges into the Clear Fork of the Trinity River and it is an impaired water body. The pollutants of concern (POCs) include polychlorinated biphenyls, dioxin and chlordan. The City does not believe it is a source because none of the industries in the City have these POCs listed in their inventories.

2. If applicable, explain below any activities taken to address the discharge to impaired waterbodies, including any sampling results and a summary of the small MS4's BMPs used to address the pollutant of concern.

The City believes these POCs are legacy chemicals and the City is not the source for these POCs.

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

Not applicable.

4. Report the benchmark identified by the MS4 and assessment activities:

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

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

Benchmark Parameter	Selected BMP	Contribution to achieving Benchmark
	Not applicable	

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

Description of bacteria-focused BMP	Comments/Discussion
Not applicable	

7. Assess the progress to determine BMP's effectiveness in achieving the benchmark.

For example, the MS4 may use the following benchmark indicators:

- number of sources identified or eliminated;
- number of illegal dumpings;
- increase in illegal dumping reported;
- number of educational opportunities conducted;

- reductions in sanitary sewer flows (SSOs); /or
- increase in illegal discharge detection through dry screening.

Benchmark Indicator	Description/Comments
Not applicable	

E. Stormwater Activities

Describe activities planned for the next reporting year:

MCM(s)	BMP	Stormwater Activity	Description/Comments
1.1	Educate Residents	Brochures and newsletter article	Have stormwater brochures available at City Hall and publish one stormwater article in the newsletter
1.1	Educate Residents	HHW and eWaste/Shred events	Offer and promote one HHW and one eWaste/Shred events for 2022
1.2	Educate Businesses	Brochures	Distribute BMP literature to industrial and commercial businesses
1.3	Educate New Home Builders/Developers	Brochures	Distribute BMP literature to new home builders/developers
1.4	Public Notice of SWMP	Report	Publish annual report on City's website
1.5	Illicit Discharge Awareness Campaign	Brochures	Distribute information associated with illicit discharges and improper disposal of waste.
1.6	Social Media Outreach	Use social media to promote stormwater issues	At a minimum, 2 informational posts annually regarding stormwater issues.
2.7	Illicit Discharge Ordinance	Review existing illicit discharge ordinance	Annually evaluate and update existing ordinances if necessary.

MCM(s)	BMP	Stormwater Activity	Description/Comments
2.8	Stormwater System Mapping	Review and update map as necessary	Review 33% of the map per year.
2.9	Detection and Elimination Program	Review existing procedures	Review program on an annual basis and revise as businesses change.
2.10	Field Staff Training	Training	Provide annual training for staff members working in the stormwater area.
2.11	Onsite Sewage Disposal	Ordinance	Review onsite sewage disposal ordinance and revise as needed.
3.14	Construction Site Stormwater Runoff	Ordinance Review	Review construction site stormwater runoff ordinance on an annual basis.
3.15	Construction Plan Review	Ordinance Review	Continue to review construction plans for stormwater management requirements, review and revise procedures as needed.
4.21	Development Plan Review	Ordinance Review	Continue to review post-development plans for stormwater management requirements and revise procedures as needed.
5.24	Employee Training	Employee Training	Review and revise employee training materials.
5.25	Street Sweeping	Street Sweeping	Continue the goal of sweeping every street at least four times per year.

F. SWMP Modifications

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

Yes No

2. Changes have been made or are proposed to the SWMP since the NOI or the last annual report, including changes in response to TCEQ's review.

Yes No

If "Yes," report on changes made to measurable goals and BMPs:

MCM(s)	Measurable Goal(s) or BMP(s)	Implemented or Proposed Changes (Submit NOC as needed)
	Not applicable	

Note: If changes include additions or substitutions of BMPs, include a written analysis explaining why the original BMP is ineffective or not feasible, and why the replacement BMP is expected to achieve the goals of the original BMP.

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

G. Additional BMPs for TMDLs and I-Plans

Provide a description and schedule for implementation of additional BMPs that may be necessary, based on monitoring results, to ensure compliance with applicable TMDLs and implementation plans.

BMP	Description	Implementation Schedule (start date, etc.)	Status/Completion Date (completed, in progress, not started)
	Not applicable		

H. Additional Information

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

Yes No

If "Yes," provide the name(s) of other entities and an explanation of their responsibilities (add more spaces or pages if needed).

Name and Explanation:

Name and Explanation:

Name and Explanation:

Name and Explanation:

2.a. Is the permittee part of a group sharing a SWMP with other entities?
 Yes No

2.b. If "yes," is this a system-wide annual report including information for all permittees?
 Yes No

If "Yes," list all associated authorization numbers, permittee names, and SWMP responsibilities of each member (add additional spaces or pages if needed):

Authorization Number: _____	Permittee: _____

I. Construction Activities

1. The number of construction activities that occurred in the jurisdictional area of the MS4 (Large and Small Site Notices submitted by construction site operators):

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

Yes No

2b. If "yes," then provide the following information for this permit year:

The number of municipal construction activities authorized under this general permit	City forces didn't have any applicable projects this year
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The total number of acres disturbed for municipal construction projects	None
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Note: Though the seventh MCM is optional, implementation must be requested on the NOI or on a NOC and approved by the TCEQ.

J. Certification

If this is this a system-wide annual report including information for all permittees, each permittee shall sign and certify the annual report in accordance with 30 TAC §305.128 (relating to Signatories to Reports).

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name (printed): Bennett C. Howell, III, PE, CFM Title: Director of Public Services

Signature:  Date: 1/20/2022

Name of MS4 The City of Benbrook

Name (printed): _____ Title: _____

Signature: _____ Date: _____

Name of MS4 _____

Name (printed): _____ Title: _____

Signature: _____ Date: _____

Name of MS4 _____

Name (printed): _____ Title: _____

Signature: _____ Date: _____

Name of MS4 _____

Name (printed): _____ Title: _____

Signature: _____ Date: _____

Name of MS4 _____

If you have questions on how to fill out this form or about the Stormwater Permitting program, please contact us at 512-239-4671.

Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, contact us at 512-239-3282.

Dry Weather Field Screening Locations for 2021

10513 Whitestone Ranch Rd.

10712 Whitestone Ranch Rd.

10817 Whitestone Ranch Rd.

7524 Green Links

8001 Echo Hills Ct

10924 Hawkins Home Blvd.

10701 Alta Sierra

Hawkins Home Blvd

540 Rodgers Rd.

320 Sterling Dr

426 Sterling Dr

550 Sterling Dr

8840 Hwy 377

Mercedes/Vista Way

304 Mildred Ln.

308 Mildred Ln.

Winscott/Sproles

1003 Sproles

1125 Shady Valley

1833 Timberline Dr.

937 Timberline Dr.

917 Timberline Dr.

913 Timberline Dr.

1201 Timberline Dr.

Dry Weather Field Screening Data Form

North Central Texas Regional Protocol



Outfall ID: #70
 Latitude/Longitude: _____
 Site Location: 1201 Timberline Dr
 Outfall Type; HDPE Con Pipe Dimensions: _____
 Receiving Water: Clear Fork
 Site Notes: _____

Calibration (within 24 hours of sampling)	Date	Time	Standard Value	Initial Meter Reading	Meter Adjusted to	Post Calibration

1 st Visit	Date: <u>7/9/21</u>	Time: _____	2nd Visit	Date: _____	Time: _____	
Precipitation	<48 hours	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Precipitation	<48 hours	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Flow	<input checked="" type="radio"/> None	Low <input type="radio"/> Med <input type="radio"/> High <input type="radio"/>	Flow	<input type="radio"/> None	Low <input type="radio"/> Med <input type="radio"/> High <input type="radio"/>	
pH	_____	s. u.	pH	_____	s. u.	
Conductivity	_____	uS	Conductivity	_____	uS	
Detergent	_____	ppm	Detergent	_____	ppm	
Chlorine	_____	ppm	Chlorine	_____	ppm	
Copper	_____	ppm	Copper	_____	ppm	
Phenols	_____	ppm	Phenols	_____	ppm	
Ammonia	_____	ppm	Ammonia	_____	ppm	
Nitrogen	_____	ppm	Nitrogen	_____	ppm	
Air Temp	_____	C	Air Temp	_____	C	
Water Temp	_____	C	Water Temp	_____	C	
Color #	_____		Color #	_____		
Odor #	_____		Odor #	_____		
Turbidity (meter)	_____	NTUs	Turbidity (meter)	_____	NTUs	
Comparator	Low (0-50) _____	Med (75-150) _____	High (200-500) _____	Low (0-50) _____	Med (75-150) _____	High (200-500) _____
Sewage	Yes <input type="checkbox"/> No <input type="checkbox"/>	Trash Yes <input type="checkbox"/> No <input type="checkbox"/>	Sewage	Yes <input type="checkbox"/> No <input type="checkbox"/>	Trash Yes <input type="checkbox"/> No <input type="checkbox"/>	
Oil Sheen	Yes <input type="checkbox"/> No <input type="checkbox"/>	Surface Scum Yes <input type="checkbox"/> No <input type="checkbox"/>	Oil Sheen	Yes <input type="checkbox"/> No <input type="checkbox"/>	Surface Scum Yes <input type="checkbox"/> No <input type="checkbox"/>	
Notes:	_____		Notes:	_____		

Mitchell Merritt
 Print Name

[Signature]
 Signature

7/9/21
 Date