MIDLAND
Engineering Services

December 3, 2020

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

Re: Phase II MS4 Annual Report Transmittal for the City of Midland MS4
TPDES Authorization: TXR040082

Dear Team Leader:

This letter serves to transmit the required annual report for the Texas Pollutant Discharge Elimination System Small Municipal Separate Storm Sewer System General Permit, Authorization Number TXR040082 for the City of Midland, Texas MS4.

The annual report is for Year__2___ . The reporting period's beginning 10/1/2019 and ending 09/30/2020.

As required by the general permit, a copy of the report has been mailed to the TCEQ's regional office 7 in **Midland**, Texas.

Respectfully,

Matt Carr, P.E., CFM
City Engineer
City of Midland

cc Lauren Medlin, TCEQ ~ Austin, TX
Robert Patrick, Interim City Manager, City of Midland

Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number TXR040000

A. General Information

Authorization Number: TXR040082

Reporting Year (year will be either 1, 2, 3, 4, or 5):___2___

Annual Reporting Year Option Selected by MS4:

Calendar Year:_____

Permit Year:_____

Fiscal Year: _____x_____ Last day of fiscal year: (_9/30_____)

Reporting period beginning date: (month/date/year) _10/1/2019_____

Reporting period end date: (month/date/year) _9/30/2020_____

MS4 Operator Level: ___4__ Name of MS4:___City of Midland MS4_____

Contact Name: _Matt Carr, P.E., CFM__Telephone Number: _432-685-7136

Mailing Address: PO Box 1152 Midland TX 79702-1152

E-mail Address: mcarr@midlandtexas.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 ___7_____

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 has not yet approved the SWMP, but City is implementing.
Permittee is currently in compliance with recordkeeping and reporting requirements.	X		
Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.).	X		
Permittee conducted an annual review of its SWMP in conjunction with preparation of the annual report	X		

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	1.a- SWMP and Annual Report	Yes, information informs the public.
1	1.b- City Cleanup	Yes. Litter in streets is reduced by this program that would have clogged channels and storm sewer systems.
2	2.a- IDDE Training	Yes. Training assists staff in coordination when a problem is noted.
2	2.b- Hazardous Material Spills	Yes. Hazardous materials are the worst types of pollutants.
2	2.c- Sewage Discharge Incidents	Yes. Sewage spills or leaks are hazardous before and after reaching stormwater.
2	2.d- Citizens Action Center Complaints	Yes. Allows City to resolve issues that might not be found without citizen input.
2	2.e- Field Screening	Yes. Allows detection of dry weather flows, which tend to be illicit discharges.

2	2.f- Reduction of Floatables	Yes. Floatables are a visible and common pollutant in Midland.
3	3.a- Construction Site Runoff Program Update	Yes. Updating program will keep it relevant and effective.
3	3.b- Construction Site Inspection and Enforcement	Yes. Inspections ensure measures are implemented.
3	3.c- Construction Site Runoff Training	Yes. Training of inspectors improves their skills.
4	4.a- Water Quality BMPs for New Developments	Yes. Applies to new site > 1 ac and controls stormwater.
4	4.b- List and Map New PRIVATE Structural Stormwater Controls	Yes. City must know locations of basins to check them.
4	4.c- Inspect Private Structural BMPs	Yes. Private basins can suffer from lack of maintenance.
5	5.a- List and Map City Facilities	Yes. City needs to keep GIS layers up to date.
5	5.b- City Structural Stormwater Control Map / Inventory	Yes. City GIS allows tracking of city maintenance.
5	5.c- Good Housekeeping Training	Yes. Employees need to be aware of actions that can cause pollution.
5	5.d- Street Sweeping	Yes. Pavement can accumulate pollutants.
5	5.e- Drainage Channel Inspection	Yes. Floatables and debris in channels also impair capacity.
5	5.f- Inspect Pollution Prevention Measures	Yes. These measures need to function correctly.
5	5.g- Structural Control Maintenance	Yes. Trash and vegetation in channels can clog storm drainage features.
5	5.h- High Priority City Facility Inspections	Yes. These facilities are more prone to generate pollutants.
5	5.i- Flood Control Project Design and Retrofit	Yes. City can implement storm pollutant removal on future flood control projects.
6	6.a- List of Private Industrial Facilities to be Inspected	Yes. Updated list is needed for this MCM.
6	6.b- Facility Inspections	Yes. These facilities may generate runoff pollutants.
6	6.c- Facility Control Measure Enforcement	Yes. Violations need to be handled using a process.

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 *(those with actions in this reporting year listed)*	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
1	1.b- City Cleanup	Trash removed from city.	52	Tons	Yes. Keep Midland Beautiful sponsors citywide trash pickups and recycling.
2	2.a- IDDE Training	Certificate	1	Sessions	No. Training staff is vital but results are indirect.
2	2.b- Hazardous Material Spills	Dispatch records	33	Responses	Yes. All spills are cleaned up.
2	2.c- Sewage Discharge Incidents	Work Order Tracking	20	Responses	Yes. All responses result in pollution ceasing.
2	2.d- Citizens Action Center Complaints	Website Tracking	1	Responses	Yes. All responses result in pollution ceasing.
3	3.b- Construction Site Inspection and Enforcement	Construction inspection records	73	Visits	Yes. Some visits found erosion control issues, resolved.
3	3.c- Construction Site Runoff Training	Certificate	1	Sessions	No. Training staff is vital but results are indirect.

4	4.b- List and Map New PRIVATE Structural Stormwater Controls	GIS Map	1	Plots	No. Mapping basins allows City to inspect them, but effects are indirect.
4	4.c- Inspect Private Structural BMPs	Work Order Tracking	1	Inspections	Yes. Any issues found can be resolved.
5	5.b- City Structural Stormwater Control Map / Inventory	GIS Map	1	Plots	No. Mapping basins allows City to inspect them, but effects are indirect.
5	5.d- Street Sweeping	Contract Records	1	Contracts	Yes. Contractor sweeps arterials, collectors and downtown 2X/yr.
5	5.e- Drainage Channel Inspection	Work Order Tracking	90	Percent	Yes. Issues found are corrected.
5	5.g- Structural Control Maintenance	Contract Records	2	Contracts	Yes. 2 contractors mow and remove debris on City basins 3X/yr.

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)** ***(those with actions in this reporting year listed)***	**Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.**
1	1.b- Continue to Sponsor KMB	Met. Budget for FY 2019/2020 shows $100,000 support.

2	2.a- Train new staff that may find illicit discharges.	Not met. Training opportunities have been affected by the current pandemic. The city is looking into virtual training sessions for the next fiscal year.
2	2.b- Respond to all hazardous spills the City is notified on	Met. All spills responded to and resolved.
2	2.c- Respond to all sewage discharges the City finds or is notified of	Met. All leaks and overflows responded to and resolved.
2	2.d- Respond to all stormwater complaints submitted to the City website	Met. All complaints responded to and resolved.
3	3.b- Inspect 15 sites per month minimum.	Not met, 73 sites inspected in 2019-2020. Level of activity affected by pandemic and economic downturn.
3	3.c- Train new staff with duties related to construction stormwater	Goal not Met. City hired new drainage manager in July of 2020. Training opportunities have been affected by the current pandemic. The city is looking into virtual training sessions for the next fiscal year.
4	4.b- Print GIS map showing new basins annually	Goal met, 107 new basins have been high-lighted on city GIS map.
4	4.c- Inspect 3 private basins per year	Goal exceeded, 4 private basins have been inspected. New private basins have been located by GIS mapping for inspections in the next fiscal year.
5	5.b- Print GIS map showing new City basins annually	3 new City basins have been highlighted in the fiscal year of 2019-2020
5	5.d- Contract is to sweep applicable streets 2x/yr	Met. City verifies that contractor has performed the required work before making payments.
5	5.e- Inspect 90% of City channels twice a year	Met. City has work orders verifying channels were inspected.

5	5.g- Mow all City basins, some of which are SSCs, 3 times yearly.	Met. City verifies that contractors have performed the required work before making payments.

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.?

MCM 5 contains O&M requirements for the City to have procedures in place to inspect and maintain streets, ROW, and City-owned parking lots, storm sewers and structural BMPs. The City has programs in place that result in a great reduction of pollutants from these features. A summary of the current programs follows.

The City of Midland Transportation staff visually inspects the streets and channels on a continuous basis. The city routinely cycles through all the channels, especially during the growing season, to assess the need for maintenance. Work orders verify inspections and responses. Transportation established two new contracts, one for street sweeping and one for channel debris removal and mowing, in the recent past. The Midland Parks and Recreation Division has a private contractor to inspect and mow several publicly used basins and channels on a more frequent basis. The presence of the three contracts provides proof that basic maintenance is being conducted on streets, channels and basins (which are the primary form of structural stormwater control measures in Midland).

In addition, the City responds to citizen requests for upkeep. Storm basin drainage pumps are inspected at least twice annually. The City has also been conducting video inspection of storm sewers. Known trouble spots such as inlets are routinely cleaned after every rainfall. Additional street sweeping by City forces is conducted where and as needed.

All parks and many basins were maintained by Parks through a contract with a private company. This contract includes these categories and annual costs:

Maintenance of parks that include drainage basins, and non-park basins:	$324,516
Maintenance of parks that include drainage channels, and other channels:	$231,032
Street Sweeping of arterials, collectors and downtown:	$120,250

Our Transportation Division work order management system reports that from October 1, 2019 to September 30, 2020, the following man-hours were spent in these categories:

Drainage Channel Inspections:	384 man-hours
Cleaning and repairing storm drains:	3,004 man-hours

In addition, the litter removal programs funded by the City as part of MCM 1 provide a great reduction in pollutants. In 2019-2020, there were a total of 507 organized cleanups that put in a total of 9405.65 volunteer hours. Over 52 tons of litter was removed from the community through these organized cleanups. Frequent cleanups from the previous year has dramatically reduced the amount of pollutants in the city limits.

D. Impaired Waterbodies *(Not Applicable)*

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.

   N/A

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.

   N/A

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

   N/A

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

Benchmark Parameter ***(Ex: Total Suspended Solids)***	**Benchmark Value**	**Description of additional sampling or other assessment activities**	**Year(s) conducted**
N/A			

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**
N/A		

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

Description of bacteria-focused BMP	Comments/Discussion
N/A	

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
N/A	

E. Stormwater Activities

Describe activities planned for the next reporting year:

MCM(s)	BMP	Stormwater Activity	Description/Comments
1	1.a- SWMP and Annual Report	Post Annual report and SWMP (after TCEQ approval)	Place SWMP and annual reports on the stormwater web site.
1	1.b- City Cleanup	Continue to sponsor KMB	Sponsor Keep Midland Beautiful volunteer cleanups for citizen participation

2	2.b- Hazardous Material Spills	Supervise containment and cleanup of hazardous spills	Fire Department Response to Hazardous Material Spills
2	2.c- Sewage Discharge Incidents	Investigate and resolve sewage discharges to ground	Health Department Response to Discharge of Sewage
2	2.d- Citizens Action Center Complaints	Investigate and resolve stormwater pollution complaints	Stormwater Administrator Response to Public Pollution Complaints
2	2.f- Reduction of Floatables	Hold workshop to evaluate current program, choose any new options and draft budget request	Collect floatables from drainage channels. This may include construction of floatable collection sites. Remove debris from selected locations.
3	3.a- Construction Site Runoff Program Update	Review ordinance, procedures and policies for compliance with MS4 permit	Review ordinances, manual, policies and procedures to comply with this MS4 permit. Update if needed.
3	3.b- Construction Site Inspection and Enforcement	Record inspections of construction sites	The Stormwater Administrator will inspect construction sites over 1 acre for erosion control and other pollution prevention requirements.
3	3.c- Construction Site Runoff Training	Train all staff with duties related to construction stormwater	Train staff with duties related to construction stormwater
4	4.a- Water Quality BMPs for New Developments	Review ordinances and manual with respect to stormwater quality.	Write memo on results of review.
4	4.b- List and Map New PRIVATE Structural Stormwater Controls	Add new privately constructed basins to GIS layer and fill in information.	Map new developer-maintained SSCs in GIS, recording ownership and maintenance duties.

4	4.c- Inspect Private Structural BMPs	Inspect private basins	Ensure permanent structural stormwater controls operate properly
5	5.a- List and Map City Facilities	Review City facility map on web site. Update list of City facilities; add TCEQ info.	Maintain Inventory and GIS layer of City Facilities (other than SSCs)
5	5.b- City Structural Stormwater Control Map / Inventory	Add new City basins to GIS layer and fill in information.	Maintain Inventory and GIS layer for Structural Stormwater Controls (City-Maintained)
5	5.d- Street Sweeping	Maintain Street Sweeping Contract	Sweep Arterial, Collector and Downtown Streets
5	5.e- Drainage Channel Inspection	Inspect applicable drainage channels	Inspect City-maintained Drainage Channels and Schedule Maintenance
5	5.f- Inspect Pollution Prevention Measures	Make list of pollution prevention measures at City facilities	Inspect all Pollution Prevention Measures at City Facilities
5	5.g- Structural Control Maintenance	Maintain 2 Basin Mowing Contracts (Parks and Transportation)	Mowing and Debris Removal at City-maintained Structural Stormwater Controls (generally basins)
5	5.h- High Priority City Facility Inspections	Assess list of high priority facilities and add to it if judged appropriate.	Inspect City Facilities Judged High Priority for Potential to Pollute Stormwater
5	5.i- Flood Control Project Design and Retrofit	Research appropriate erosion reduction and pollutant removal techniques	Develop Program to Add Erosion Reduction and Pollutant Removal to New and Existing Flood Control Projects
6	6.a- List of Private Industrial Facilities to be Inspected	Update list of industrial facilities to inspect.	Maintain List of Private Industrial Facilities Subject to Inspection

6	6.b- Facility Inspections	Inspect 4 facilities in City limits	Conduct Facility Inspections
6	6.c- Facility Control Measure Enforcement	Write procedures for enforcing violations found in inspections	Implement Facility Control Measure Enforcement

F. SWMP Modifications

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

__X__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.
__X__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)
1-6		*This annual report is based on a revised December 2019 SWMP, submitted concurrently. In response to TCEQ review, most BMP's and Measurable Goals were reworded to better conform with the permit language. The City's Stormwater management program remains the same, but the revised SWMP provides better descriptions of measurable targets.*

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)

N/A			

H. Additional Information

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

___ Yes _X__ 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:

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

___ Yes _X__ 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):

_____65_____

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

___ Yes _X__ No

2b. 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	N/A

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): Patrick Payton Title: Mayor

Signature: _____ Date: Dec 8, 2020

Name of MS4 City of Midland 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.