



Stormwater Management Plan

City of Woodway

February 10, 2025

TABLE OF CONTENTS

	<u>Page No.</u>
INTRODUCTION	1
DEFINITIONS	1
COMMONLY USED ACRONYMS	7
CONTROL MEASURES	8
Public Education and Outreach	8
Public Involvement/Participation	10
Illicit Discharge Detection and Elimination (IDDE)	12
Construction Site Stormwater Runoff Control	20
Post-Construction Stormwater Management in New Development and Redevelopment	27
Pollution Prevention and Good Housekeeping for Municipal Operations	31
RECORDKEEPING & REPORTING	38
SUMMARY OF BMP's FOR 2025-2029 PERMIT TERM	40

INTRODUCTION:

The City of Woodway, with a 2020 Decennial Census population listed at 9383 people, is a Traditional Small (Phase II) MS4, regulated under Level 1 and required by the Texas Commission on Environmental Quality (TCEQ) to develop a Stormwater Management Plan (SWMP). The following plan will constitute the required SWMP. A SWMP must be developed prior to the electronic submission of 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, as appropriate, the months and years in which the permittee will undertake the required actions, including interim milestones and the frequency of the action throughout the permit term. New elements in the SWMP, whether updated TCEQ requirements or planned by permittee, must be completely implemented within five years of the effective date of this general permit. Continual monitoring of the plan will occur to ensure that the plan is fully implemented and to verify the impact to area stormwater. Periodic updates will be made in accordance with TCEQ requirements and the needs of the permittee, and changes to the SWMP, if necessary, will be submitted according to TCEQ protocol.

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:

Benchmarks – A benchmark pollutant value is a guidance level indicator that helps determine the effectiveness of chosen best management practices (BMPs). This type of monitoring differs from “compliance monitoring” in that exceedances of the indicator or benchmark level are not permit violations, but rather indicators that can help identify problems at the Municipal Separate Storm Sewer System (MS4) with exposed or unidentified pollutant sources; or control measures that are either not working correctly, whose effectiveness needs to be reconsidered, or that need to be supplemented with additional BMPs.

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 Activity – Soil disturbance, including clearing, grading, excavating, and other construction related activities (e.g., stockpiling of fill material and demolition); and not including routine maintenance that is performed to maintain the original line and grade, hydraulic capacity, or original purpose of the site (e.g., the routine grading of existing dirt roads, asphalt overlays of existing roads, the routine clearing of existing rights-of-way, and similar maintenance activities). Regulated construction activity is defined in terms of small and large construction activity.

- **Small Construction Activity** is a construction activity that results 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.
- **Large Construction Activity** is a construction activity that results 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.

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

- (a) 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
- (b) 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 stormwater pollution prevention plan (SWP3) 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 SWP3 or comply with other permit conditions).

Control Measure – Any BMP or other method used to prevent or reduce the discharge of pollutants to water in the state.

Conveyance – Curbs, gutters, man-made channels and ditches, drains, pipes, and other constructed features designed or used for flood control or to otherwise transport stormwater runoff.

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:

- (a) 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.

- (b) For individual lots in a residential construction site by either:
 - (1) The homebuilder completing final stabilization as specified in above condition; or
 - (2) 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.
- (c) 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.

High Priority Facilities – High priority facilities are facilities with a high potential to generate stormwater pollutants. These facilities must include, at a minimum, the MS4 operator’s maintenance yards, hazardous waste facilities, fuel storage locations, and other facilities where chemicals or other materials have a high potential to be discharged in stormwater. Among the factors that must be considered when giving a facility a high priority ranking are: the amount of urban pollutants stored at the site, the identification of improperly stored, activities that must not be performed outside (for example, changing automotive fluids, vehicle washing), proximity to water bodies, proximity to sensitive aquifer recharge features, poor housekeeping practices, and discharge of pollutant(s) of concern to impaired water(s).

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.

City of Woodway Stormwater Management Plan
February 10, 2025

Level 1 – A category of regulated small MS4, as defined by the general permit based on the residential population within the regulated portion of the small MS4 as listed in the 2020 Decennial Census. Operators in this category are traditional small MS4s that serve a population of less than 10,000 within an “urban area with a population of at least 50,000 people.” This designation remains in place throughout the permit term, regardless of population increases.

- City of Woodway population according to the 2020 Decennial Census data: 9,383 people;
- City of Woodway meets the definition of a “traditional small MS4”; and
- Within the urban area of Waco, with a population of more than 50,000 people

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.

Notice of Intent (NOI) – A written submission to the executive director from an applicant requesting coverage under this general permit.

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.

Pollutant(s) of Concern (POCs) – For the purpose of this permit, includes biochemical oxygen demand (BOD), sediment or a parameter that addresses sediment (such as total suspended solids [TSS], turbidity, or siltation), pathogens, oil and grease, and any pollutant that has been identified as a cause of impairment of any water body that will receive a discharge from an MS4.

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

City of Woodway Stormwater Management Plan
February 10, 2025

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 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.

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

Stormwater 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.

Traditional Small MS4 – A small MS4 that can pass ordinances and have the enforcement authority to enforce the stormwater management program. An example of traditional MS4s includes cities.

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

City of Woodway Stormwater Management Plan

February 10, 2025

- 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;
- 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, TXRI50000
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
POC:	Pollutant(s) of Concern
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 and Outreach

The City of Woodway shall develop, implement, and maintain a comprehensive stormwater education and outreach program to distribute educational materials to the community and conduct equivalent outreach about the impacts of stormwater discharges on water bodies and the steps the public can take to reduce pollutants in stormwater runoff. Per the requirements of Part IV, Section D.1(3)(a) of the General Permit, this SWMP and all required annual reports will be posted to the City of Woodway public website.

- 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) in accordance with Part IV, Section D.1(a)(1) of the 2024 Small MS4 General Permit;
 - Identify specific pollutant(s) to be targeted in education and outreach programs in accordance with Part IV, Section D.1(a)(2) and Table 3 of the 2024 Small MS4 General Permit;
 - Develop or utilize appropriate educational materials, such as printed materials and websites in accordance with Part IV, Section D.1(a)(3) and Table 4 of the 2024 Small MS4 General Permit;
 - Determine cost effective and practical methods and procedures for distribution of materials.
- B. The following BMPs were deemed effective by previously developed SWMPs and will continue to be administered:
- Promotion of water conservation practices and stormwater protocols 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.
 - A stormwater drain inlet stenciling program was 100% completed and will continue to be implemented as the SW system expands.
 - Targeted mailings regarding proper Fat/Oil/Grease (FOG) disposal and recycling, sent to 100% of Woodway restaurant owners annually.

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

The public education and outreach program shall at a minimum include the following target(s), in accordance with 2024 Small MS4 General Permit, Part IV, Section D.1.1:

- Audience(s) - All residents served by the City of Woodway water system
- Pollutants and Sources (selected from Table 3)– Litter, trash containment, balloon releases

Per Part IV, Section D.1(3)(b) of the General Permit, the City of Woodway is required to implement a minimum of three (3) public education and outreach BMPs from Table 4.

Activity/BMP	Measurable Goals
Information on the MS4 operator's website.	<p>The City of Woodway public website will be updated and maintained a minimum of once per year during the permit term, to include the following information:</p> <ol style="list-style-type: none"> (1) Current SWMP – updated within 30 days of NOI approval, per requirements of Part IV, Section D.1(a).3(a)(i). – anticipated date: March 2025 (2) Annual Reports – will be posted within 30 days of report submission each year, starting no later than February 2026, per requirements of Part IV, Section D.1(a).3(a)(ii) (3) Educational and outreach materials or links – added no later than December 2025 and updated at least once annually throughout the permit term. Such materials will include references from EPA and TCEQ, as well as materials developed for internal training as part of SWMP BMPs.
Publish articles in local newspaper or newsletter, may be electronic.	<p>The City currently publishes a bimonthly newsletter, mailed or emailed to all addresses with water service connections. Starting in 2025 and continuing throughout the permit term, the City will:</p> <ol style="list-style-type: none"> (1) Develop and publish one (1) article or infographic between January 1 and

	<p>June 30 to address target pollutants (litter, trash containment, balloon releases) and sources related to spring/summer activities (increased park usage and outdoor sports activities, yard maintenance, prom and wedding events, etc.)</p> <p>(2) Develop and publish one (1) article or infographic between July 1 and December 31 to address target pollutants (litter, trash containment, balloon releases) and sources related to fall/winter activities (park usage and outdoor sports activities, holiday events, etc.)</p>
<p>Promote, host, or develop educational meetings, seminars, or trainings.</p>	<p>Starting no later than December 2025 and continuing through the permit term, the City will host and/or promote a minimum of one (1) annual event that:</p> <p>(1) Offers educational materials on the adverse impact of target pollutants and their sources. Target pollutants include: litter, trash containment, and balloon releases.</p> <p>(2) Provides educational materials on stormwater pollution prevention, including materials obtained from the EPA, TCEQ, and the City of Woodway’s affiliation with Keep Texas Beautiful.</p> <p>(3) Will be promoted so as to encourage attendance of all Woodway residents and business owners.</p>

2. Public Involvement/Participation

The City of Woodway shall involve the public, and, at a minimum, comply with any state and local public notice requirements in the planning and implementation activities related to developing and implementing the SWMP. The City shall create opportunities, or support activities that are coordinated by citizen groups, for residents and others to become involved with the SWMP. The activities and BMPs must demonstrate an impact on stormwater runoff by improving water quality.

- A. The Public Involvement/Participation activities and measurable goals will, at a minimum:

- Create opportunities for citizens to participate in the implementation of control measures
- Ensure the public can easily find information about the SWMP
- B. The following BMPs were deemed effective by previously developed SWMPs and will continue to be administered:
 - Involvement of residents through public meetings
 - Hosting public cleanup events with resident volunteer participation
 - Including access to the SWMP on the City website

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

Per Part IV, Section D.2.(a)(1) of the General Permit, the City of Woodway is required to implement a minimum of two (2) public involvement/participation BMPs from Table 5.

- (1) Contribute supplies, equipment, disposal services, financial support, advertising, and/or meeting or event space

Per Part IV, Section D.2.(b) of the General Permit, the City of Woodway is required to create/host or support the public involvement/participation BMPs. To be considered support given to the coordinating groups, the City of Woodway must conduct at least one (1) of the following:

- (1) Plan, or assist with planning, the event or activity
- (2) Provide assistance from City of Woodway staff during the event
- (3) Provide assistance with recruiting volunteers for events

The City of Woodway may partner with other MS4 operators to maximize the program and cost effectiveness of the required public involvement/participation activities.

Activity/BMP	Measurable Goals
MS4 area-wide stormwater survey for input on program implementation.	Starting no later than December 2025, the City of Woodway will provide or support a minimum of one (1) annual survey, accessible to 100% of residential water customers, for input on program implementation. This includes methods by which the City may improve stormwater pollution control and prevention measures and increase public awareness and

	<p>involvement.</p> <p>To ensure 100% residential customer access, the City may utilize the public website, social media, electronic communications (email), bimonthly newsletters, and/or in-person methods. Participation will be tracked by receipt and digital engagement.</p> <p>This survey may be incorporated into a broader survey targeting city-wide pollution prevention, clean-up, and beautification needs. If so, the requirements of this section will be met by providing questions that clearly and specifically reference stormwater and program implementation.</p>
<p>Educational display/booth at a school, public event, or similar event to provide information or displays that work to improve public understanding of issues related to water quality.</p>	<p>Starting no later than December 2025, the City of Woodway will provide or support a minimum of (1) staffed booth or display at an annual event hosted or supported by the City and open to the public.</p> <p>This booth will offer educational information and supplies or materials to encourage public involvement, including information about ongoing surveys and contacts to facilitate public reporting of water quality concerns.</p>

3. 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:

- A current and accurate MS4 map (see *Part IV.D.3.(c)(1) of 2024 Small MS4 General Permit*);
- Methods for informing and training MS4 field staff (see *Part IV.D.3.(c)(2) of 2024 Small MS4 General Permit*);
- Methods for facilitating public reporting of illicit discharges and illegal dumping (see *Part IV.D.3.(c)(3) of 2024 Small MS4 General Permit*);
- Procedures for responding to illicit discharge, illegal dumping, and spills (see *Part IV.D.3.(c)(4) of 2024 Small MS4 General Permit*);
- Procedures for tracing and removing the source of an illicit discharge and illegal dumping (see *Part IV.D.3.(c)(5) of 2024 Small MS4 General Permit*);
- Conduct inspections in response to complaints including follow-up inspections and procedures for inspections (*Part IV.D.3.(c)(6) of 2024 Small MS4 General Permit*)

The following BMP’s will be developed and implemented for Illicit Discharge Detection and Elimination (IDDE) during this 5-year permit period:

Per Part IV, Section D.3(c) of the General Permit, the City of Woodway is required to implement all eight (8) of the Illicit Discharge Detection and Elimination (IDDE) BMPs from Table 6.

Activity/BMP	Measurable Goals
Maintain a current and accurate MS4 map as described in Part IV.D.3.(c)(1).	The City of Woodway created an MS4 map in accordance with BMPs set forth in a previously

	<p>approved SWMP. Per the requirements of the referenced Section of the 2024 Small MS4 General Permit, the City of Woodway’s Public Utilities staff will confirm, no later than December 2025, that this map shows:</p> <ul style="list-style-type: none"> • The location of all small MS4 outfalls that are operated by the permittee and that discharge into Waters of the U.S.; • The location and name of all surface waters receiving discharges from the small MS4 outfalls; and • Priority areas identified under Part IV.D.3.(e)(1), if applicable <p>Starting no later than December 2025, the MS4 map will be reviewed by Public Utilities staff at least once annually throughout the duration of the permit term to confirm accuracy.</p> <p>New developments will be assessed throughout the permitting and inspections process to determine if changes to the MS4 map are warranted. All additions, subtractions, or adjustments will be reflected on the MS4 map within 30 days and confirmed at the annual map review.</p>
<p>Conduct training for all the permittee’s field staff as described in Part IV.D.3.(c)(2).</p> <p>Training may be conducted in person or using self-paced training materials such as videos or reading materials.</p>	<p>Starting no later than December 2025, the City of Woodway will develop and conduct a minimum of one (1) training event annually for 100% of the Public Works and Public Utilities department staff. These departments are primarily responsible for identification, reporting, and abatement.</p> <p>Department heads will utilize training materials from TCEQ and the EPA, as well as the MS4 map and field site visits to develop and conduct a training program. Program materials will be printed and maintained, along with attendee sign-in sheets that will verify completion. Department supervisors will be responsible for training those unable to attend the annual event and obtaining signature confirmation of completion.</p> <p>Further, written training material will be provided for Building Inspections, Public Safety and Meter</p>

City of Woodway Stormwater Management Plan
February 10, 2025

	<p>Reading personnel. This material will focus on illicit discharges identified by the ordinance, and provide contacts for reporting suspect discharges, dumping, or connections to the Community Services Director for investigation.</p>
<p>Maintain and publicize a public reporting method for the public to report illicit discharges, illegal dumping, or water quality impacts associated with discharges into or from the small MS4 such as a reporting hotline, online form, or other similar mechanism as described in Part IV.D.3.(c)(3).</p>	<p>Starting immediately, the City of Woodway will maintain a minimum of one (1) public reporting mechanism 100% of the time during the permit term. Available reporting mechanisms currently include: telephone, email, and social media.</p> <p>No later than December 2025, the City of Woodway will create posts, articles, or infographics specific to illicit discharge, dumping, and water quality that publicize public reporting methods on social media and in the City’s bi-monthly newsletter. These posts will include information that assists the public in understanding what constitutes illicit discharge or illegal dumping. They will be posted at least one (1) time quarterly on all social media platforms and published at least one (1) time annually through the bi-monthly newsletter to inform the public about their reporting options.</p> <p>Further, no later than May 2025, the City of Woodway will update a portion of its website to include explicit instructions for reporting illicit discharge and illegal dumping for investigation. This information will remain accessible throughout the permit term and be updated within one (1) week of any change to the reporting protocol. Links to this portion of the website will be included in related social media and newsletter postings and publications.</p>
<p>Develop and maintain procedures for responding to illicit discharges, illegal dumping, and spills as described in Part IV.D.3.(c)(4).</p>	<p>No later than December 2025, the City of Woodway will create a manual that details the procedures for responding to illicit discharges, illegal dumping, and spills. This manual will be kept at the office of the Director of Community Services and Development, and it will be reviewed and updated at least once every year throughout the permit period.</p> <p>Such procedures will include, but are not limited to:</p>

	<ul style="list-style-type: none"> • Reporting protocol & identification of staff responsible for investigation and enforcement • Documentation and investigation protocol, including determination of priority levels based on relative risk of pollution • Corrective actions, including standards for escalation, and abatement responsibility <p>No later than December 2026, the manual will be incorporated into the annual training program for MS4 field staff.</p>
<p>Source investigation and elimination of illicit discharges and illegal dumping as described in Part IV.D.3.(c)(5).</p>	<p>Continuing BMPs from previous permit terms and effective immediately, the City of Woodway will respond to 100% of known illicit discharges and illegal dumping incidents each year to investigate sources.</p> <ul style="list-style-type: none"> • Community Services & Development or Code Enforcement field staff will initiate an investigation within 24 hours of the incident becoming known. • Protocol for source identification, corrective measures, and abatement will be determined after priority level has been established by staff, in accordance with procedures established under Part IV.D.3.(c)(4) <p>Continuing BMPs from previous permit terms and effective immediately, the City of Woodway's Public Utilities staff will respond to 100% of high priority discharges each year, such as sanitary sewer discharges, within 24 hours.</p> <ul style="list-style-type: none"> • A full list of high priority discharges will be included in procedures established under Part IV.D.3.(c)(4) and provided to field staff as part of annual training in order to expedite identification • Abatement and cleanup

	<p>measures will begin immediately upon discovery, regardless of source identification status, to limit pollution risk</p> <ul style="list-style-type: none"> • Source identification measures will resume once any immediate pollution threat is addressed, in accordance with procedures established under Part IV.D.3.(c)(4) <p>For 100% of illicit discharges or illegal dumping where the City of Woodway does not have jurisdiction, the City will notify adjacent MS4 operator (City of Waco; McLennan County) or the TCEQ Region 9 office within 24 hours of determination of jurisdiction.</p> <p>TCEQ will be immediately notified of 100% of illicit flows believed to be an immediate threat to human health or the environment.</p>
<p>Corrective action to eliminate illicit discharges and illegal dumping as described in Part IV.D.3.(c)(5).</p>	<p>Continuing BMPs from previous permit terms and effective immediately, for 100% of illicit discharges or illegal dumping incidents where a source has been determined, the responsible party will be notified of the problem within 24 hours.</p> <p>Notification measures shall include: (1) in-person contact, (2) printed notices left in a conspicuous area (ex: front door) at responsible party's address of record, and/or (3) certified mail.</p> <p>Regarding corrective actions and elimination:</p> <ul style="list-style-type: none"> • If the illicit discharge or illegal dumping posed an immediate threat to life or safety that required staff to take immediate abatement action, the responsible party will be assessed fees commensurate with the costs of abatement and any further action required to eliminate the illicit discharge. • If illicit discharge or illegal dumping is still present once the responsible party has been identified, the responsible party will be required to perform all necessary corrective actions.

<p>Inspection Procedures as described in Part IV.D.3.(c)(6).</p>	<p>No later than December 2025, the City of Woodway shall develop written procedures describing the basis for conducting inspections in response to complaints. Such written procedures will be based on active adopted policies and will contain measures for: (1) tracking and investigating reports, (2) identifying and notifying responsible parties, (3) corrective action or enforcement, and (4) follow-up inspections.</p> <p>Procedures will be reviewed annually and updated as needed. No later than December 2026, these written procedures will be incorporated into the training program conducted for all MS4 field personnel.</p>
<p>Inspections in response to complaints as described in Part IV.D.3.(c)(6).</p>	<p>Continuing BMPs from previous permit terms and effective immediately, the City of Woodway will conduct inspections in response to 100% of complaints each year.</p> <ul style="list-style-type: none"> • No later than January 2026, all MS4 staff responsible for conducting inspections will be trained in procedures written in accordance with Part IV.D.3.(c)(6), and 100% of inspections will be conducted in accordance with these procedures for the remainder of the permit term. • Procedures shall include, at minimum, protocols for reporting, scheduling, documentation, corrective action, and follow-up inspections. • Effective immediately, the City shall document 100% of complaints in a computer-based service order system and update with information about source identification, corrective measures, and follow up as the investigation progresses. <p>Continuing BMPs from previous permit terms and effective immediately, the City of Woodway will conduct follow-up inspections on 100% of complaints where illicit discharge or illegal dumping was confirmed.</p>

	<ul style="list-style-type: none"> • No later than January 2026, all MS4 staff responsible for conducting follow-up inspections will be trained in the newly written procedures, and 100% of follow-up inspections will be conducted in accordance with these procedures for the remainder of the permit term. • Procedures shall include, at minimum, protocols for scheduling, documentation, and escalation of corrective action. • Effective immediately, 100% of follow-up inspections shall be documented in a computer-based service order system. Documentation may be by standalone service order or through specific note in the initial complaint service order, as deemed appropriate by the Director of Community Services and Development. • Follow-up inspections shall continue at regular intervals, as determined by procedures developed under Part IV.D.3.(c)(6), until the complaint has been resolved to the satisfaction of the City. • To ensure appropriate corrective action and/or escalation, documentation for each follow-up inspection shall include information that readily allows for a determination of timely resolution or repeat offenses. Specific requirements will be outlined in the inspection procedures developed under Part IV.D.3.(c)(6), and may include, but are not limited to: deadlines set forth by the City, photographs, and documentation of repeat offenses.
<p>ADDITIONAL ACTIVE BMPs NOT CURRENTLY REQUIRED FOR LEVEL 1:</p>	<p>(1) Public Utilities crews document and proactively address sections of the sanitary sewer system previously identified as being at a high risk for</p>

	<p>overflow based on past illicit discharges. Actions taken include increased monitoring and use of equipment or chemical treatment to prevent illicit discharges.</p> <p>(2) Continuing from the previous permit term and effective immediately, the City of Woodway Public Works crew will conduct dry-weather inspections of known stormwater inlets, based on the existing map.</p> <p>Inspections will continue to:</p> <ul style="list-style-type: none"> • Be performed so that 20% of all inlets are inspected annually, with 100% of inlets inspected no later than the end of the permit term. • Confirm that inlets are marked, free of illicit discharge or pollution, and clear of any debris that would inhibit the flow of stormwater. <p>The location of any inlets not shown on the existing map will be documented, and those inlets inspected at the time of discovery. Previously undocumented inlets will then be added to the map and incorporated into the 5-year inspection rotation no later than December 2029 (end of permit term).</p>
--	--

4. Construction Site Stormwater Runoff Control

The City of Woodway shall develop, implement, and enforce a program requiring 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.

If TCEQ waives requirements for stormwater discharges associated with small construction from a specific site(s), the City of Woodway is not required to enforce the program to reduce pollutant discharges from such site(s). Obtaining proof of such waiver is the responsibility of the construction general contractor or the property owner.

(A) Requirements for All Permittees

The City of Woodway shall require 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, including discharges from trenches and excavations, unless managed by appropriate BMPs

(C) Construction Plan Review Procedures

To the extent allowable by state, federal, and local law, 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;
- No plans may be approved unless the plans contain appropriate site-specific construction site control measures that, at a minimum, meet the requirements described in the TPDES CGP, TXR1500000, including a stormwater pollution prevention plan (SWP3/SWPPP).

- The City of Woodway Code of Ordinances requires the installation of erosion and sedimentation control measures on all construction sites where a permit is required. Such controls must be installed at the start of construction and be maintained until final stabilization of the site (ex: placement of sod or paving) has been approved by the City. Discharges of dirt, mud, gravel, etc. from any site, regardless of permitting status, are prohibited.

(D) Construction Site Inspections and Enforcement

To the extent allowable by state, federal, and local law, the City of Woodway shall develop and implement written procedures, based on existing protocols, for inspecting large and small construction projects. These procedures will include visual 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. Written procedures will outline the inspection and enforcement requirements and be maintained as part of the SWMP. Inspections of construction sites will, at a minimum:

- 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 City of Woodway's requirements;
- Assess compliance with the City of Woodway Code of Ordinances and other regulations; and
- 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 will be tracked through the city's current computer software and made available for review by the TCEQ.

(E) Information Submitted by the Public

The City of Woodway shall develop, implement, and maintain procedures for receipt and consideration of information submitted by the public.

(F) MS4 Staff Training

The City of Woodway shall ensure that all staff whose primary job duties are related to

implementing the construction stormwater program (including permitting, plan review, construction site inspections, and enforcement) are informed or trained to conduct these activities. This training may be conducted by City of Woodway staff or by outside agencies.

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

Per Part IV, Section D.4(b) of the General Permit, the City of Woodway is required to implement all seven (7) of the Construction Site Stormwater Runoff Control BMPs from Table 9.

Activity/BMP	Measurable Goals
<p>Develop and maintain an ordinance or other regulatory mechanism as described in Part IV.D.4.(a)</p>	<p>The City of Woodway has the following ordinances in place:</p> <ul style="list-style-type: none"> ○ <u>Ordinance #4.1 Plumbing Code</u> ○ <u>Ordinance # 18-2.81 through 18-2.94</u> ○ <u>Ordinance #16.3 Runoff of dirt, sand, gravel, caliche or mud on to public property prohibited.</u> ○ <u>Section 17-24.5 (F) (3) Soil Erosion Control Plans</u> ○ <u>Appendix A-Zoning Sec. 2.1010 Grading and Drainage</u> ○ <u>Appendix A-Zoning Sec. 2.1011 Erosion and Sedimentation Control</u> <p>At least one (1) time during the permit term, and no later than December 2027, staff responsible for stormwater runoff control and enforcement will review the existing ordinances and make written recommendations regarding potential changes, updates, or improvements deemed appropriate.</p> <p>Adopted protocols and written procedures not codified by ordinance will be reviewed at least one (1) time annually, and any changes deemed necessary will be recorded and maintained with the SWMP.</p>

<p>Prohibited discharges as described in Part IV.D.4.(b)(2)</p>	<p>Prohibited discharges are currently addressed in the City of Woodway’s Code of Ordinances, as listed above.</p> <p>No later than May 2025, the existing ordinances will be reviewed to confirm that all prohibited discharges reflected by this section are listed. If changes to the ordinance requiring City Council approval are required to bring the ordinance into compliance with this section, action will be taken by staff no later than December 2025 to place necessary changes on the City Council agenda for approval.</p> <p>Once initial compliance has been confirmed, staff will review the ordinance at least one (1) additional time during the permit term to address changes and make improvements where applicable.</p>
<p>Maintain and implement site plan review procedures that describe which plans will be reviewed as well as when an operator may begin construction as described in Part IV.D.4.(b)(3)</p>	<p>Existing ordinances require new, non-residential development to complete a site development approval process that includes projected topographical changes which could impact runoff, provision for retention, detention, and/or drainage improvements, and plans to prevent pollution and site runoff during the construction process. At least one (1) time during the permit term, these existing ordinances will be reviewed and, if deemed necessary, updated to meet the most current requirements and recommendations of TCEQ and the needs of the City.</p> <p>No later than August 2025, the City of Woodway will update site plan review protocol and produce a written set of procedures, to be kept with the SWMP. These procedures will:</p> <ul style="list-style-type: none"> • Be implemented for 100% of new construction site plans received each year • Target the prevention of construction site runoff and pollution by establishing specific criteria that must be met before an operator/contractor can begin construction on any site where a permit is required • Be available to all operators/contractors prior to submission of a permit application. Methods of availability

	<p>may include printed or digital and will be placed in immediate proximity of permit applications.</p> <ul style="list-style-type: none"> • Be reviewed and updated at least one (1) time annually throughout the permit term to address changes and make improvements to the established procedures, as deemed appropriate
<p>Implement procedures for inspecting large and small construction projects as described in Part IV.D.4.(b)(4)</p>	<p>No later than September 2025, the City of Woodway will review and update existing construction site inspection protocol, creating a set of written procedures that will be maintained as part of the SWMP.</p> <p>These procedures will include:</p> <ul style="list-style-type: none"> • Construction benchmarks for required inspections • Criteria for determining whether the site has appropriate coverage under the TPDES CGP, TXR15000 and, if necessary, notifying the permittee of the need for coverage • Criteria and protocol for suspension of inspections and/or permits while deficiencies are addressed, and conditions for removal of suspension
<p>Conduct construction site inspections as described in Part IV.D.4.(b)(4)</p>	<p>Effective immediately, and continuing throughout the permit term, 100% of large and small construction projects will be inspected for stormwater control measure compliance at least one (1) time during the active construction phase.</p> <p>Once written procedures have been established according to Part IV.D.4.(b)(4), and beginning no later than October 2025, inspections will be conducted in accordance with the construction benchmarks set forth in the written procedures and, if deemed necessary, all other inspections will be suspended until site control compliance is achieved.</p> <p>A final stormwater compliance inspection will be required for 100% of permitted construction sites to confirm final soil stabilization before a final certificate</p>

	<p>of occupancy is issued to the site operator. In the event a temporary certificate of occupancy is requested prior to final soil stabilization, the City will require maintenance of all site control measures until final stabilization is achieved.</p> <p>Construction site inspections will be scheduled and completed through an electronic service order or permit & inspections management system, and site operators will receive an electronic copy of each inspection report.</p>
<p>Develop, implement, and maintain procedures for receipt and consideration of information submitted by the public as described in Part IV.D.4.(b)(5)</p>	<p>Effective immediately, and continuing throughout the permit term, 100% of the information received by the public regarding potential construction site violations will be documented through an electronic service order or permit & inspections management system.</p> <p>The public may currently submit information to the Department of Community Services & Development via telephone, and this method will be maintained throughout the permit term.</p> <p>No later than April 2026, the City will provide a method of electronic public reporting and advertise this method on the website and social media. This method may include email or a reporting form through the City’s website, or both. Electronic communications will go directly to the Department of Community Services & Development, expediting consideration and investigation.</p> <p>Based on existing protocols, a set of written procedures for receipt and consideration of information submitted by the public will be developed and implemented no later than January 2026. These procedures will be maintained with the SWMP and available for review.</p> <p>After development, these procedures will be reviewed at least one (1) time annually for the remainder of the permit term.</p>
<p>Conduct training for all the MS4 staff whose primary job duties are related to implementing the construction stormwater program as described in Part IV.D.4.(b)(6).</p>	<p>No later than December 2025, 100% of staff responsible for construction site inspections and enforcement will receive training for these activities. Training will:</p> <ul style="list-style-type: none"> • Be conducted at least one (1) time

<p>Training may be conducted in person or using self-paced training materials such as videos or reading materials.</p>	<p>annually using printed and/or video materials obtained through TCEQ or EPA, as well as City Ordinance requirements</p> <ul style="list-style-type: none"> • Incorporate new procedures written as part of the SWMP as they are completed • Include a visit to an active construction site to review compliance requirements and City procedures <p>No later than December 2026, 100% of staff responsible for permitting, plan review, and processing information received from the public will receive training for these activities. Training will:</p> <ul style="list-style-type: none"> • Be conducted at least one (1) time annually using printed and/or video materials obtained through TCEQ or EPA, as well as City Ordinance requirements • Confirm that staff can identify and confirm receipt of all necessary stormwater management documentation required as part of permitting and plan review • Incorporate new procedures written as part of the SWMP as they are completed
--	---

5. Post-Construction Stormwater 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 projects. The City of Woodway will require owners or operators of new development and redeveloped sites to design, install, implement, and maintain a combination of structural and non-structural

City of Woodway Stormwater Management Plan
February 10, 2025

BMPs appropriate for the community and that protects water quality. The City of Woodway will be responsible for reviewing annually and updating 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 in New Development and Redevelopment during this 5-year permit period:

Per Part IV, Section D.5.(b) of the General Permit, the City of Woodway is required to implement all three (3) of the Post-Construction Stormwater Management in New Development and Redevelopment BMPs from Table 11.

Activity/BMP	Measurable Goals
Develop and maintain an ordinance or other regulatory mechanism as described in Part IV.D.5.(a)(2)	<p>Continuing from the previous permit term, the City of Woodway will enforce existing ordinance requirements for post-construction stormwater management. Such measures include detention, erosion prevention, and site stabilization requirements.</p> <p>The City of Woodway will review and, if deemed appropriate, update the existing ordinances at least two (2) times during the permit term:</p> <ul style="list-style-type: none"> • One (1) time before December 2027 • One (1) time between January 2028 and the end of the permit term in December 2029 <p>Ordinances will address detention, final soil stabilization, maintenance, and prevention of erosion into the public rights-of-way.</p>
Document and maintain records of enforcement actions and make them available for review by the TCEQ as described	Effective immediately, and continuing throughout the permit term, the City of Woodway will electronically document and maintain records of

<p>in Part IV.D.5.(b)(1)</p>	<p>100% of enforcement actions utilizing the existing inspections and service order management systems.</p> <p>The City of Woodway will make 100% of the enforcement records available to TCEQ within 24 hours of request.</p> <p>No later than December 2027, the City of Woodway will review existing protocols for documentation of enforcement actions and establish a written list of documentation procedures, to be kept with the SWMP and incorporated into training for applicable personnel.</p>
<p>Ensure the long-term operation and maintenance of structural stormwater control measures installed as described in Part IV.D.5.(b)(2)</p>	<p>A. City-maintained sites:</p> <p>(1) Effective immediately, and continuing throughout the permit term, the City of Woodway will visually inspect at least 20% of City-controlled stormwater inlet structures annually, utilizing a rotating schedule that ensures the inspection of 100% of stormwater inlet structures during each permit term. This schedule is established from the previous permit term and recycles over each 5-year permit term,</p> <p>(2) No later than December 2025, the City of Woodway will develop and implement a maintenance plan and schedule for stormwater control inspections and maintenance on 100% of sites where the City is responsible for maintenance, including building and park areas, well sites, storage and staging areas, and wastewater facilities. This maintenance plan will require, at minimum, one (1) visual inspection of each site per year, and contain procedures for immediate reporting of and addressing any maintenance issues.</p> <p>B. Effective immediately, and</p>

	<p>continuing throughout the permit term, the City of Woodway shall ensure the long-term operation and maintenance of structural stormwater control measures through the enforcement of existing City ordinances. These ordinances:</p> <ul style="list-style-type: none">• Require 100% of owners or operators of any new development or redeveloped sites to submit, as part of the site development process, a plan detailing pre- and post-development stormwater volume and structural stormwater control measures to be installed• Require 100% of private property owners to maintain any required detention structures• Address conditions for final soil stabilization and the issuance of certificates of occupancy• Require 100% of private property owners to maintain any landscaping material or other means of final soil stabilization required by site development plans, including replacement when needed, to prevent long-term erosion <p>C. No later than December 2027, the City of Woodway shall update site development ordinance requirements to include:</p> <ul style="list-style-type: none">• Requirements that 100% of owners and operators of any new development or redeveloped sites must develop and implement an ongoing maintenance plan for any structural control measures installed on site.• Requirements that 100% of the maintenance performed must be documented by the site owner or operator and made available for review to the City of Woodway or TCEQ within 24 hours of the
--	---

	request. To ensure compliance, the City will implement a protocol for routine review of this documentation no later than the end of the permit term in December 2029.
--	---

6. Pollution Prevention and Good Housekeeping for Municipal Operations

The City of Woodway shall develop and implement an operation and maintenance program (O&M), 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

The City of Woodway shall develop and 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:

- Composting facilities;
- Equipment storage and maintenance facilities;
- Fuel storage facilities;
- Hazardous waste disposal facilities;
- Hazardous waste handling and transfer facilities;
- Incinerators;
- Landfills;
- Materials storage yards;
- Pesticide storage facilities;
- Buildings, including schools, libraries, police stations, fire stations, and office buildings;
- Parking lots;
- Golf courses;
- Swimming pools;
- Public works yards;
- Recycling facilities;
- Salt storage facilities;
- Solid waste handling and transfer facilities;
- Street repair and maintenance sites;
- Vehicle storage and maintenance yards; and

- Structural stormwater controls

(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.

(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.

(D) Contractor Requirements and Oversight

Any contractors hired by the City of Woodway to perform maintenance activities on city-owned facilities must be contractually obligated to comply with all of the stormwater control measures, good housekeeping practices, and facility-specific stormwater management operating procedures described in Part IV.D.6.(b)(2)-(6) of the general permit. The City of Woodway shall provide oversight of contractor activities to ensure that contractors are using appropriate control measures when applicable. Oversight procedures must be maintained on-site and made available for inspection by TCEQ.

(E) Municipal Operation and Maintenance Activities

1. The City of Woodway shall evaluate operation and maintenance (O&M) activities for their potential to discharge pollutants into 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; Bridge maintenance, including such areas as re-chipping, grinding, and saw cutting;
- 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

2. The City of Woodway shall identify pollutants of concern that could be discharged from the above O&M activities (for example, metals; chlorides; hydrocarbons such as benzene, toluene, ethyl benzene, and xylenes; sediment; and trash).

3. The City of Woodway shall develop and implement a set of pollution prevention measures that will reduce the discharge of pollutants in stormwater from the above activities. These pollution prevention measures must include at least two of the

following:

- Replacing materials and chemicals with more environmentally friendly materials or methods;
- Tracking application of deicing and anti-icing compounds;
- Using suspended tarps, booms, or vacuums to capture paint, solvents, rust, paint chips and other pollutants generated by regular bridge maintenance; and
- Placing barriers around or conducting runoff away from de-icing chemical storage areas to prevent discharge into surface waters

4. All pollution prevention measures implemented at City-owned facilities must be visually inspected to ensure that they are working properly. The City of Woodway shall develop written procedures that describe the frequency of inspections occurring at least one (1) time annually and how they will be conducted. A log of inspections must 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. The City of Woodway shall develop written procedures that define the frequency of inspections occurring at least one (1) time annually and how they will be conducted.

The following BMP’s will be developed and implemented for Pollution Prevention and Good Housekeeping during this 5-year permit period:

Per Part IV, Section D.6 of the General Permit, the City of Woodway is required to implement all nine (9) of the Pollution Prevention and Good Housekeeping for Municipal Operations BMPs from Table 13.

Activity/BMP	Measurable Goals
Permittee-owned Facilities and Control Inventory as described by Part IV.D.6.(b)(1).	<p>No later than December 2025, the City of Woodway will develop and maintain an inventory of 100% of City-owned and operated facilities and stormwater controls. This inventory will:</p> <ul style="list-style-type: none"> ○ Include all applicable permit numbers, registration, numbers, and authorizations for each facility or control; ○ Identify the type of facility, as detailed in the referenced section of the general permit

	<ul style="list-style-type: none"> ○ Be updated no later than January 2027 to include a list of potential pollutants stored at each site <p>One (1) copy of the inventory will be maintained with the SWMP, and one (1) copy will be kept at the Public Utilities/Works maintenance office.</p> <p>This inventory will be reviewed and updated at least one (1) time annually for the remainder of the permit term to address changes or additions to the facilities and controls where applicable.</p>
<p>Training and Education as described in Part IV.D.6.(b)(2)</p> <p>Training may be conducted in person or using self-paced training materials such as videos or reading materials.</p>	<p>Effective immediately, and continuing throughout the permit term, the City of Woodway will conduct a minimum of one (1) training annually for 100% of employees involved in implementing pollution prevention and good housekeeping practices. A training attendance list will be maintained and made available for TCEQ review when requested.</p> <p>Initially, training will utilize printed materials and/or videos obtained through TCEQ and EPA.</p> <p>The City-owned Facilities and Controls Inventory will be incorporated into training upon completion, and no later than December 2026.</p> <p>No later than December 2027, the training will be updated to include the list of potential pollutants stored at each site and include specific pollution prevention practices and good housekeeping measures related to those pollutants.</p> <p>Where the City uses contractors to implement pollution prevention and good housekeeping practices, the contractor will be required to review City-provided training materials.</p>
<p>Disposal of Waste Material as described in Part IV.D.6.(b)(3).</p>	<p>Effective immediately, and continuing throughout the permit term, 100% of waste materials removed from the City of Woodway will be disposed of in accordance with TAC Chapters 330 or 335, as applicable.</p> <p>No later than December 2027, the City will</p>

	<p>develop waste material disposal procedures, to be included with the City-owned Facilities and Control Inventory, for each of the potential pollutants stored at each facility. These procedures will be immediately incorporated into staff training for pollution prevention and good housekeeping measures.</p>
<p>Contractor Requirements and Oversight as described in Part IV.D.6.(b)(4).</p>	<p>Effective immediately, 100% of contractors hired by the City of Woodway to perform maintenance activities on permittee-owned facilities will be contractually required to comply with all of the stormwater control measures, good housekeeping practices, and facility-specific stormwater management operating procedures described in Parts IV.D.6.(b)(2)-(6).</p> <p>Effective immediately, City staff trained in these measures, practices, and procedures will provide oversight for 100% of contractor activities to ensure compliance.</p> <p>No later than January 2026, the City of Woodway will develop written oversight procedures, to be maintained with the SWMP. A copy of these procedures will be provided to contractors, kept on-site during maintenance activities, and made available for inspection by TCEQ on request.</p>
<p>Assessment of permittee-owned operations as described in Part IV.D.6.(b)(5)a.</p>	<p>No later than April 2026, the City of Woodway will evaluate 100% of operation and maintenance (O&M) activities for their potential to discharge pollutants in stormwater, including but not limited to each of the activities listed in Part IV.D.6.(b)(5)a of the general permit.</p> <p>A list of standard operations and maintenance (O&M) activities utilized by the City of Woodway will be developed as part of this evaluation and maintained with the SWMP.</p> <p>The list of O&M activities will be reviewed and, if necessary, updated at least one (1) time annually throughout the remainder of the permit term.</p>

City of Woodway Stormwater Management Plan
February 10, 2025

<p>Identify pollutants of concern as described in Part IV.D.6.(b)(5)b.</p>	<p>No later than April 2027, the City of Woodway will identify pollutants of concern that could be discharged from 100% of the O&M activities listed under Part IV.D.6.(b)(5)a – (for example, metals; chlorides; hydrocarbons such as benzene, toluene, ethyl benzene, and xylenes; sediment; and trash.</p> <p>The list of O&M activities developed under the previous BMP will be updated with the pollutants of concern as they are identified.</p> <p>The list of pollutants of concern will be reviewed and, if necessary, updated at least one (1) time annually throughout the remainder of the permit term to address changes or additions to the O&M activities.</p>
<p>Pollution Prevention Measures as described in Part IV.D.6.(b)(5)c.</p>	<p>The City of Woodway will develop and implement a set of pollution prevention measures that will reduce the discharge of pollutants in stormwater from the above activities. These pollution prevention measures will include, but are not limited to:</p> <ul style="list-style-type: none"> ○ Replacing at least 50% of the City’s materials and chemicals with more environmentally friendly materials or methods by the end of the permit term, December 2029. ○ Tracking 100% of the application of deicing and anti-icing compounds used in the City of Woodway, including a written record of the amount of compound used for each application annually, effective immediately. <p>No later than April 2028, these and any additional pollution prevention measures will be put in writing and kept with the SWMP. The record will be updated to reflect changes as materials and methods are replaced.</p>
<p>Inspection of Pollution Prevention Measures as described in Part IV.D.6.(b)(5)d.</p>	<p>Effective immediately, the City of Woodway will conduct, at minimum, an annual review of 100% of the pollution prevention measures that have</p>

	<p>been implemented at City-owned facilities to ensure that they are adequate for the needs of the facility and functioning properly.</p> <p>Between the date of permit approval and December 2025, City staff will conduct a review of the inspection needs for all City-owned sites to determine appropriate frequency and procedures for each.</p> <p>No later than December 2026, the City will develop written procedures for each site in accordance with the needs established during the first permit year. These procedures will be kept with the SWMP, and a copy of the procedures for each site will be included in training materials for staff.</p> <p>Beginning in January 2027 and continuing throughout the remainder of the permit term, these procedures will be reviewed at least one (1) time annually to address any changes or additions to the pollution prevention measures.</p> <p>Effective immediately, 100% of inspections conducted at City-owned facilities will be logged electronically and available for review, The preferred logging method will be the electronic service order system currently used by the City, though an additional log will be created if necessary.</p>
<p>Structural Control Maintenance as described by Part IV.D.6.(b)(6).</p>	<p>Where BMPs for City-owned facilities include structural controls, the City of Woodway will perform maintenance as needed to ensure effectiveness.</p> <p>Between permit approval and December 2025, the City will, as part of its inspection at each facility, document structural controls which will require maintenance and, if needed, perform that maintenance.</p> <p>No later than February 2026, the City will develop a maintenance plan and schedule for all City-owned structural controls. The plan will include written procedures detailing steps for maintenance appropriate to each site and</p>

	<p>structural control. The schedule will be developed in accordance with each site's maintenance needs and will include no less than one (1) scheduled maintenance activity per year. This plan and schedule will be kept with the SWMP, and maintenance activities will be documented using the City's electronic service order system or similar log.</p> <p>The City will review and update all maintenance procedures at least one (1) time annually to address changes or additions to the pollution prevention measures.</p> <p>When new structural controls are installed, the City will incorporate them into the City's written plan for inspections and maintenance within 30 days.</p>
--	---

RECORDKEEPING AND REPORTING:

A. Recordkeeping

1. In accordance with Part V, Section A of the TPDES General Permit, the City of Woodway will maintain a copy of the following for a period of at least three (3) years, or for the remainder of the term of the general permit, whichever is longer:
 - a. The TPDES General Permit
 - b. The City of Woodway's approved NOI, and all data used in its submission
 - c. The City of Woodway's SWMP
 - d. Annual Reports submitted as a requirement of this permit
 - e. All materials developed as part of Best Management Practices under this SWMP
2. These materials will be kept by the Community Services and Development department, and will be made available to TCEQ upon request, and to the public at reasonable times during regular business hours upon written request. The SWMP and Annual Reports will be made available on the City's website per the BMPs developed as part of this plan.

B. Reporting

1. Noncompliance which endangers human health or safety, or the environment, will be reported to the TCEQ Regional Office within 24 hours and the Enforcement Division (MC-224) within five (5) working days of becoming aware of the noncompliance.
2. An annual report, including all items listed in Part V, Section B.2(a) through (i), will

City of Woodway Stormwater Management Plan
February 10, 2025

be submitted to TCEQ via the electronic reporting (NeT-MS4) system no later than March 31st of each year for the previous calendar year.

- a. This report will be published on the City's website no later than 30 days after submission.

Summary of Best Management Practices for 2025-2029 Permit Term:

Activity/BMP	Measurable Goals
<p>Information on the MS4 operator’s website.</p>	<p>The City of Woodway public website will be updated and maintained a minimum of once per year during the permit term, to include the following information:</p> <ul style="list-style-type: none"> (1) Current SWMP – updated within 30 days of NOI approval, per requirements of Part IV, Section D.1(a).3(a)(i). – anticipated date: March 2025 (2) Annual Reports – will be posted within 30 days of report submission each year, starting no later than February 2026, per requirements of Part IV, Section D.1(a).3(a)(ii) (3) Educational and outreach materials or links – added no later than December 2025 and updated at least once annually throughout the permit term. Such materials will include references from EPA and TCEQ, as well as materials developed for internal training as part of SWMP BMPs.
<p>Publish articles in local newspaper or newsletter, may be electronic.</p>	<p>The City currently publishes a bimonthly newsletter, mailed or emailed to all addresses with water service connections. Starting in 2025 and continuing throughout the permit term, the City will:</p> <ul style="list-style-type: none"> (1) Develop and publish one (1) article or infographic between January 1 and June 30 to address target pollutants (litter, trash containment, balloon releases) and sources related to spring/summer activities (increased park usage and outdoor sports activities, yard maintenance, prom and wedding events, etc.) (2) Develop and publish one (1) article or infographic between July 1 and December 31 to address target pollutants (litter, trash containment, balloon releases) and sources related to fall/winter activities

City of Woodway Stormwater Management Plan
February 10, 2025

	(park usage and outdoor sports activities, holiday events, etc.)
Promote, host, or develop educational meetings, seminars, or trainings.	<p>Starting no later than December 2025 and continuing through the permit term, the City will host and/or promote a minimum of one (1) annual event that:</p> <ul style="list-style-type: none"> (1) Offers educational materials on the adverse impact of target pollutants and their sources. Target pollutants include: litter, trash containment, and balloon releases. (2) Provides educational materials on stormwater pollution prevention, including materials obtained from the EPA, TCEQ, and the City of Woodway’s affiliation with Keep Texas Beautiful. (3) Will be promoted so as to encourage attendance of all Woodway residents and business owners.
MS4 area-wide stormwater survey for input on program implementation.	<p>Starting no later than December 2025, the City of Woodway will provide or support a minimum of one (1) annual survey, accessible to 100% of residential water customers, for input on program implementation. This includes methods by which the City may improve stormwater pollution control and prevention measures and increase public awareness and involvement.</p> <p>To ensure 100% residential customer access, the City may utilize the public website, social media, electronic communications (email), bimonthly newsletters, and/or in-person methods. Participation will be tracked by receipt and digital engagement.</p> <p>This survey may be incorporated into a broader survey targeting city-wide pollution prevention, clean-up, and beautification needs. If so, the requirements of this section will be met by providing questions that clearly and specifically reference stormwater and program implementation.</p>
Educational display/booth at a school, public event, or similar event to provide information or displays that work to improve public understanding of issues	<p>Starting no later than December 2025, the City of Woodway will provide or support a minimum of (1) staffed booth or display at an annual event hosted or supported by the City and open to the public.</p>

City of Woodway Stormwater Management Plan
February 10, 2025

<p>related to water quality.</p>	<p>This booth will offer educational information and supplies or materials to encourage public involvement, including information about ongoing surveys and contacts to facilitate public reporting of water quality concerns.</p>
<p>Maintain a current and accurate MS4 map as described in Part IV.D.3.(c)(1).</p>	<p>The City of Woodway created an MS4 map in accordance with BMPs set forth in a previously approved SWMP. Per the requirements of the referenced Section of the 2024 Small MS4 General Permit, the City of Woodway’s Public Utilities staff will confirm, no later than December 2025, that this map shows:</p> <ul style="list-style-type: none"> • The location of all small MS4 outfalls that are operated by the permittee and that discharge into Waters of the U.S.; • The location and name of all surface waters receiving discharges from the small MS4 outfalls; and • Priority areas identified under Part IV.D.3.(e)(1), if applicable <p>Starting no later than December 2025, the MS4 map will be reviewed by Public Utilities staff at least once annually throughout the duration of the permit term to confirm accuracy.</p> <p>New developments will be assessed throughout the permitting and inspections process to determine if changes to the MS4 map are warranted. All additions, subtractions, or adjustments will be reflected on the MS4 map within 30 days and confirmed at the annual map review.</p>
<p>Conduct training for all the permittee’s field staff as described in Part IV.D.3.(c)(2).</p> <p>Training may be conducted in person or using self-paced training materials such as videos or reading materials.</p>	<p>Starting no later than December 2025, the City of Woodway will develop and conduct a minimum of one (1) training event annually for 100% of the Public Works and Public Utilities department staff. These departments are primarily responsible for identification, reporting, and abatement.</p> <p>Department heads will utilize training materials from TCEQ and the EPA, as well as the MS4 map and field site visits to develop and conduct a training program. Program materials will be printed and maintained,</p>

City of Woodway Stormwater Management Plan
February 10, 2025

	<p>along with attendee sign-in sheets that will verify completion. Department supervisors will be responsible for training those unable to attend the annual event and obtaining signature confirmation of completion.</p> <p>Further, written training material will be provided for Building Inspections, Public Safety and Meter Reading personnel. This material will focus on illicit discharges identified by the ordinance, and provide contacts for reporting suspect discharges, dumping, or connections to the Community Services Director for investigation.</p>
<p>Maintain and publicize a public reporting method for the public to report illicit discharges, illegal dumping, or water quality impacts associated with discharges into or from the small MS4 such as a reporting hotline, online form, or other similar mechanism as described in Part IV.D.3.(c)(3).</p>	<p>Starting immediately, the City of Woodway will maintain a minimum of one (1) public reporting mechanism 100% of the time during the permit term. Available reporting mechanisms currently include: telephone, email, and social media.</p> <p>No later than December 2025, the City of Woodway will create posts, articles, or infographics specific to illicit discharge, dumping, and water quality that publicize public reporting methods on social media and in the City’s bi-monthly newsletter. These posts will include information that assists the public in understanding what constitutes illicit discharge or illegal dumping. They will be posted at least one (1) time quarterly on all social media platforms and published at least one (1) time annually through the bi-monthly newsletter to inform the public about their reporting options.</p> <p>Further, no later than May 2025, the City of Woodway will update a portion of its website to include explicit instructions for reporting illicit discharge and illegal dumping for investigation. This information will remain accessible throughout the permit term and be updated within one (1) week of any change to the reporting protocol. Links to this portion of the website will be included in related social media and newsletter postings and publications.</p>
<p>Develop and maintain procedures for responding to illicit discharges, illegal dumping, and spills as described in Part IV.D.3.(c)(4).</p>	<p>No later than December 2025, the City of Woodway will create a manual that details the procedures for responding to illicit discharges, illegal dumping, and spills. This manual will be kept at the office of the Director of Community Services and Development,</p>

	<p>and it will be reviewed and updated at least once every year throughout the permit period.</p> <p>Such procedures will include, but are not limited to:</p> <ul style="list-style-type: none"> • Reporting protocol & identification of staff responsible for investigation and enforcement • Documentation and investigation protocol, including determination of priority levels based on relative risk of pollution • Corrective actions, including standards for escalation, and abatement responsibility <p>No later than December 2026, the manual will be incorporated into the annual training program for MS4 field staff.</p>
<p>Source investigation and elimination of illicit discharges and illegal dumping as described in Part IV.D.3.(c)(5).</p>	<p>Continuing BMPs from previous permit terms and effective immediately, the City of Woodway will respond to 100% of known illicit discharges and illegal dumping incidents each year to investigate sources.</p> <ul style="list-style-type: none"> • Community Services & Development or Code Enforcement field staff will initiate an investigation within 24 hours of the incident becoming known. • Protocol for source identification, corrective measures, and abatement will be determined after priority level has been established by staff, in accordance with procedures established under Part IV.D.3.(c)(4) <p>Continuing BMPs from previous permit terms and effective immediately, the City of Woodway’s Public Utilities staff will respond to 100% of high priority discharges each year, such as sanitary sewer discharges, within 24 hours.</p> <ul style="list-style-type: none"> • A full list of high priority discharges will be included in procedures established under Part IV.D.3.(c)(4) and provided to field staff as part of annual training in order to

	<p>expedite identification</p> <ul style="list-style-type: none"> Abatement and cleanup measures will begin immediately upon discovery, regardless of source identification status, to limit pollution risk Source identification measures will resume once any immediate pollution threat is addressed, in accordance with procedures established under Part IV.D.3.(c)(4) <p>For 100% of illicit discharges or illegal dumping where the City of Woodway does not have jurisdiction, the City will notify adjacent MS4 operator (City of Waco; McLennan County) or the TCEQ Region 9 office within 24 hours of determination of jurisdiction.</p> <p>TCEQ will be immediately notified of 100% of illicit flows believed to be an immediate threat to human health or the environment.</p>
<p>Corrective action to eliminate illicit discharges and illegal dumping as described in Part IV.D.3.(c)(5).</p>	<p>Continuing BMPs from previous permit terms and effective immediately, for 100% of illicit discharges or illegal dumping incidents where a source has been determined, the responsible party will be notified of the problem within 24 hours.</p> <p>Notification measures shall include: (1) in-person contact, (2) printed notices left in a conspicuous area (ex: front door) at responsible party's address of record, and/or (3) certified mail.</p> <p>Regarding corrective actions and elimination:</p> <ul style="list-style-type: none"> If the illicit discharge or illegal dumping posed an immediate threat to life or safety that required staff to take immediate abatement action, the responsible party will be assessed fees commensurate with the costs of abatement and any further action required to eliminate the illicit discharge. If illicit discharge or illegal dumping is still present once the responsible party has been identified, the responsible party will be required to perform all necessary corrective actions.

<p>Inspection Procedures as described in Part IV.D.3.(c)(6).</p>	<p>No later than December 2025, the City of Woodway shall develop written procedures describing the basis for conducting inspections in response to complaints. Such written procedures will be based on active adopted policies and will contain measures for: (1) tracking and investigating reports, (2) identifying and notifying responsible parties, (3) corrective action or enforcement, and (4) follow-up inspections.</p> <p>Procedures will be reviewed annually and updated as needed. No later than December 2026, these written procedures will be incorporated into the training program conducted for all MS4 field personnel.</p>
<p>Inspections in response to complaints as described in Part IV.D.3.(c)(6).</p>	<p>Continuing BMPs from previous permit terms and effective immediately, the City of Woodway will conduct inspections in response to 100% of complaints each year.</p> <ul style="list-style-type: none"> • No later than January 2026, all MS4 staff responsible for conducting inspections will be trained in procedures written in accordance with Part IV.D.3.(c)(6), and 100% of inspections will be conducted in accordance with these procedures for the remainder of the permit term. • Procedures shall include, at minimum, protocols for reporting, scheduling, documentation, corrective action, and follow-up inspections. • Effective immediately, the City shall document 100% of complaints in a computer-based service order system and update with information about source identification, corrective measures, and follow up as the investigation progresses. <p>Continuing BMPs from previous permit terms and effective immediately, the City of Woodway will conduct follow-up inspections on 100% of complaints where illicit discharge or illegal dumping was confirmed.</p> <ul style="list-style-type: none"> • No later than January 2026, all MS4 staff responsible for conducting follow-up

	<p>inspections will be trained in the newly written procedures, and 100% of follow-up inspections will be conducted in accordance with these procedures for the remainder of the permit term.</p> <ul style="list-style-type: none"> • Procedures shall include, at minimum, protocols for scheduling, documentation, and escalation of corrective action. • Effective immediately, 100% of follow-up inspections shall be documented in a computer-based service order system. Documentation may be by standalone service order or through specific note in the initial complaint service order, as deemed appropriate by the Director of Community Services and Development. • Follow-up inspections shall continue at regular intervals, as determined by procedures developed under Part IV.D.3.(c)(6), until the complaint has been resolved to the satisfaction of the City. • To ensure appropriate corrective action and/or escalation, documentation for each follow-up inspection shall include information that readily allows for a determination of timely resolution or repeat offenses. Specific requirements will be outlined in the inspection procedures developed under Part IV.D.3.(c)(6), and may include, but are not limited to: deadlines set forth by the City, photographs, and documentation of repeat offenses.
<p>ADDITIONAL ACTIVE BMPs NOT CURRENTLY REQUIRED FOR LEVEL 1:</p>	<p>(1) Public Utilities crews document and proactively address sections of the sanitary sewer system previously identified as being at a high risk for overflow based on past illicit discharges. Actions taken include increased monitoring and use of equipment or chemical treatment to prevent illicit discharges.</p> <p>(2) Continuing from the previous permit term and effective immediately, the City of Woodway</p>

	<p>Public Works crew will conduct dry-weather inspections of known stormwater inlets, based on the existing map.</p> <p>Inspections will continue to:</p> <ul style="list-style-type: none"> • Be performed so that 20% of all inlets are inspected annually, with 100% of inlets inspected no later than the end of the permit term. • Confirm that inlets are marked, free of illicit discharge or pollution, and clear of any debris that would inhibit the flow of stormwater. <p>The location of any inlets not shown on the existing map will be documented, and those inlets inspected at the time of discovery. Previously undocumented inlets will then be added to the map and incorporated into the 5-year inspection rotation no later than December 2029 (end of permit term).</p>
<p>Develop and maintain an ordinance or other regulatory mechanism as described in Part IV.D.4.(a)</p>	<p>The City of Woodway has the following ordinances in place:</p> <ul style="list-style-type: none"> ○ <u>Ordinance #4.1 Plumbing Code</u> ○ <u>Ordinance # 18-2.81 through 18-2.94</u> ○ <u>Ordinance #16.3 Runoff of dirt, sand, gravel, caliche or mud on to public property prohibited.</u> ○ <u>Section 17-24.5 (F) (3) Soil Erosion Control Plans</u> ○ <u>Appendix A-Zoning Sec. 2.1010 Grading and Drainage</u> ○ <u>Appendix A-Zoning Sec. 2.1011 Erosion and Sedimentation Control</u> <p>At least one (1) time during the permit term, and no later than December 2027, staff responsible for stormwater runoff control and enforcement will</p>

	<p>review the existing ordinances and make written recommendations regarding potential changes, updates, or improvements deemed appropriate.</p> <p>Adopted protocols and written procedures not codified by ordinance will be reviewed at least one (1) time annually, and any changes deemed necessary will be recorded and maintained with the SWMP.</p>
<p>Prohibited discharges as described in Part IV.D.4.(b)(2)</p>	<p>Prohibited discharges are currently addressed in the City of Woodway’s Code of Ordinances, as listed above.</p> <p>No later than May 2025, the existing ordinances will be reviewed to confirm that all prohibited discharges reflected by this section are listed. If changes to the ordinance requiring City Council approval are required to bring the ordinance into compliance with this section, staff will act no later than December 2025 to place necessary changes on the City Council agenda for approval.</p> <p>Once initial compliance has been confirmed, staff will review the ordinance at least one (1) additional time during the permit term to address changes and make improvements where applicable.</p>
<p>Maintain and implement site plan review procedures that describe which plans will be reviewed as well as when an operator may begin construction as described in Part IV.D.4.(b)(3)</p>	<p>Existing ordinances require new, non-residential development to complete a site development approval process that includes projected topographical changes which could impact runoff, provision for retention, detention, and/or drainage improvements, and plans to prevent pollution and site runoff during the construction process. At least one (1) time during the permit term, these existing ordinances will be reviewed and, if deemed necessary, updated to meet the most current requirements and recommendations of TCEQ and the needs of the City.</p> <p>No later than August 2025, the City of Woodway will update site plan review protocol and produce a written set of procedures, to be kept with the SWMP. These procedures will:</p> <ul style="list-style-type: none"> • Be implemented for 100% of new construction site plans received each year • Target the prevention of construction

	<p>site runoff and pollution by establishing specific criteria that must be met before an operator/contractor can begin construction on any site where a permit is required</p> <ul style="list-style-type: none"> • Be available to all operators/contractors prior to submission of a permit application. Methods of availability may include printed or digital and will be placed in immediate proximity of permit applications. • Be reviewed and updated at least one (1) time annually throughout the permit term to address changes and make improvements to the established procedures, as deemed appropriate
<p>Implement procedures for inspecting large and small construction projects as described in Part IV.D.4.(b)(4)</p>	<p>No later than September 2025, the City of Woodway will review and update existing construction site inspection protocol, creating a set of written procedures that will be maintained as part of the SWMP.</p> <p>These procedures will include:</p> <ul style="list-style-type: none"> • Construction benchmarks for required inspections • Criteria for determining whether the site has appropriate coverage under the TPDES CGP, TXR15000 and, if necessary, notifying the permittee of the need for coverage • Criteria and protocol for suspension of inspections and/or permits while deficiencies are addressed, and conditions for removal of suspension
<p>Conduct construction site inspections as described in Part IV.D.4.(b)(4)</p>	<p>Effective immediately, and continuing throughout the permit term, 100% of large and small construction projects will be inspected for stormwater control measure compliance at least one (1) time during the active construction phase.</p> <p>Once written procedures have been established according to Part IV.D.4.(b)(4), and beginning no later than October 2025, inspections will be conducted in</p>

	<p>accordance with the construction benchmarks set forth in the written procedures and, if deemed necessary, all other inspections will be suspended until site control compliance is achieved.</p> <p>A final stormwater compliance inspection will be required for 100% of permitted construction sites to confirm final soil stabilization before a final certificate of occupancy is issued to the site operator. In the event a temporary certificate of occupancy is requested prior to final soil stabilization, the City will require maintenance of all site control measures until final stabilization is achieved.</p> <p>Construction site inspections will be scheduled and completed through an electronic service order or permit & inspections management system, and site operators will receive an electronic copy of each inspection report.</p>
<p>Develop, implement, and maintain procedures for receipt and consideration of information submitted by the public as described in Part IV.D.4.(b)(5)</p>	<p>Effective immediately, and continuing throughout the permit term, 100% of the information received by the public regarding potential construction site violations will be documented through an electronic service order or permit & inspections management system.</p> <p>The public may currently submit information to the Department of Community Services & Development via telephone, and this method will be maintained throughout the permit term.</p> <p>No later than April 2026, the City will provide a method of electronic public reporting and advertise this method on the website and social media. This method may include email or a reporting form through the City’s website, or both. Electronic communications will go directly to the Department of Community Services & Development, expediting consideration and investigation.</p> <p>Based on existing protocols, a set of written procedures for receipt and consideration of information submitted by the public will be developed and implemented no later than January 2026. These procedures will be maintained with the SWMP and available for review.</p> <p>After development, these procedures will be</p>

	<p>reviewed at least one (1) time annually for the remainder of the permit term.</p>
<p>Conduct training for all the MS4 staff whose primary job duties are related to implementing the construction stormwater program as described in Part IV.D.4.(b)(6).</p> <p>Training may be conducted in person or using self-paced training materials such as videos or reading materials.</p>	<p>No later than December 2025, 100% of staff responsible for construction site inspections and enforcement will receive training for these activities. Training will:</p> <ul style="list-style-type: none"> • Be conducted at least one (1) time annually using printed and/or video materials obtained through TCEQ or EPA, as well as City Ordinance requirements • Incorporate new procedures written as part of the SWMP as they are completed • Include a visit to an active construction site to review compliance requirements and City procedures <p>No later than December 2026, 100% of staff responsible for permitting, plan review, and processing information received from the public will receive training for these activities. Training will:</p> <ul style="list-style-type: none"> • Be conducted at least one (1) time annually using printed and/or video materials obtained through TCEQ or EPA, as well as City Ordinance requirements • Confirm that staff can identify and confirm receipt of all necessary stormwater management documentation required as part of permitting and plan review • Incorporate new procedures written as part of the SWMP as they are completed
<p>Develop and maintain an ordinance or other regulatory mechanism as described in Part IV.D.5.(a)(2)</p>	<p>Continuing from the previous permit term, the City of Woodway will enforce existing ordinance requirements for post-construction stormwater management. Such measures include detention, erosion prevention, and site stabilization requirements.</p> <p>The City of Woodway will review and, if deemed appropriate, update the existing ordinances at least two (2) times during the permit term:</p>

	<ul style="list-style-type: none"> • One (1) time before December 2027 • One (1) time between January 2028 and the end of the permit term in December 2029 <p>Ordinances will address detention, final soil stabilization, maintenance, and prevention of erosion into the public rights-of-way.</p>
<p>Document and maintain records of enforcement actions and make them available for review by the TCEQ as described in Part IV.D.5.(b)(1)</p>	<p>Effective immediately, and continuing throughout the permit term, the City of Woodway will electronically document and maintain records of 100% of enforcement actions utilizing the existing inspections and service order management systems.</p> <p>The City of Woodway will make 100% of the enforcement records available to TCEQ within 24 hours of request.</p> <p>No later than December 2027, the City of Woodway will review existing protocols for documentation of enforcement actions and establish a written list of documentation procedures, to be kept with the SWMP and incorporated into training for applicable personnel.</p>
<p>Ensure the long-term operation and maintenance of structural stormwater control measures installed as described in Part IV.D.5.(b)(2)</p>	<p>A. City-maintained sites:</p> <ol style="list-style-type: none"> (1) Effective immediately, and continuing throughout the permit term, the City of Woodway will visually inspect at least 20% of City-controlled stormwater inlet structures annually, utilizing a rotating schedule that ensures the inspection of 100% of stormwater inlet structures during each permit term. This schedule is established from the previous permit term and recycles over each 5-year permit term, (2) No later than December 2025, the City of Woodway will develop and implement a maintenance plan and schedule for stormwater control inspections and maintenance on 100% of sites where the City is responsible for maintenance, including building and park areas, well sites, storage and

	<p>staging areas, and wastewater facilities. This maintenance plan will require, at minimum, one (1) visual inspection of each site per year, and contain procedures for immediate reporting of and addressing any maintenance issues.</p> <p>B. Effective immediately, and continuing throughout the permit term, the City of Woodway shall ensure the long-term operation and maintenance of structural stormwater control measures through the enforcement of existing City ordinances. These ordinances:</p> <ul style="list-style-type: none">• Require 100% of owners or operators of any new development or redeveloped sites to submit, as part of the site development process, a plan detailing pre- and post-development stormwater volume and structural stormwater control measures to be installed• Require 100% of private property owners to maintain any required detention structures• Address conditions for final soil stabilization and the issuance of certificates of occupancy• Require 100% of private property owners to maintain any landscaping material or other means of final soil stabilization required by site development plans, including replacement when needed, to prevent long-term erosion <p>C. No later than December 2027, the City of Woodway shall update site development ordinance requirements to include:</p> <ul style="list-style-type: none">• Requirements that 100% of owners and operators of any new development or redeveloped sites
--	---

	<p>must develop and implement an ongoing maintenance plan for any structural control measures installed on site.</p> <ul style="list-style-type: none"> • Requirements that 100% of the maintenance performed must be documented by the site owner or operator and made available for review to the City of Woodway or TCEQ within 24 hours of the request. To ensure compliance, the City will implement a protocol for routine review of this documentation no later than the end of the permit term in December 2029.
<p>Permittee-owned Facilities and Control Inventory as described by Part IV.D.6.(b)(1).</p>	<p>No later than December 2025, the City of Woodway will develop and maintain an inventory of 100% of City-owned and operated facilities and stormwater controls. This inventory will:</p> <ul style="list-style-type: none"> ○ Include all applicable permit numbers, registration, numbers, and authorizations for each facility or control; ○ Identify the type of facility, as detailed in the referenced section of the general permit ○ Be updated no later than January 2027 to include a list of potential pollutants stored at each site <p>One (1) copy of the inventory will be maintained with the SWMP, and one (1) copy will be kept at the Public Utilities/Works maintenance office.</p> <p>This inventory will be reviewed and updated at least one (1) time annually for the remainder of the permit term to address changes or additions to the facilities and controls where applicable.</p>
<p>Training and Education as described in Part IV.D.6.(b)(2)</p> <p>Training may be conducted in person or using self-paced training materials such as videos or reading materials.</p>	<p>Effective immediately, and continuing throughout the permit term, the City of Woodway will conduct a minimum of one (1) training annually for 100% of employees involved in implementing pollution prevention and good housekeeping practices. A training attendance list will be maintained and made available for TCEQ review when requested.</p>

	<p>Initially, training will utilize printed materials and/or videos obtained through TCEQ and EPA.</p> <p>The City-owned Facilities and Controls Inventory will be incorporated into training upon completion, and no later than December 2026.</p> <p>No later than December 2027, the training will be updated to include the list of potential pollutants stored at each site and include specific pollution prevention practices and good housekeeping measures related to those pollutants.</p> <p>Where the City uses contractors to implement pollution prevention and good housekeeping practices, the contractor will be required to review City-provided training materials.</p>
<p>Disposal of Waste Material as described in Part IV.D.6.(b)(3).</p>	<p>Effective immediately, and continuing throughout the permit term, 100% of waste materials removed from the City of Woodway will be disposed of in accordance with TAC Chapters 330 or 335, as applicable.</p> <p>No later than December 2027, the City will develop waste material disposal procedures, to be included with the City-owned Facilities and Control Inventory, for each of the potential pollutants stored at each facility. These procedures will be immediately incorporated into staff training for pollution prevention and good housekeeping measures.</p>
<p>Contractor Requirements and Oversight as described in Part IV.D.6.(b)(4).</p>	<p>Effective immediately, 100% of contractors hired by the City of Woodway to perform maintenance activities on permittee-owned facilities will be contractually required to comply with all of the stormwater control measures, good housekeeping practices, and facility-specific stormwater management operating procedures described in Parts IV.D.6.(b)(2)-(6).</p> <p>Effective immediately, City staff trained in these measures, practices, and procedures will provide oversight for 100% of contractor activities to ensure compliance.</p> <p>No later than January 2026, the City of Woodway will develop written oversight procedures, to be</p>

	<p>maintained with the SWMP. A copy of these procedures will be provided to contractors, kept on-site during maintenance activities, and made available for inspection by TCEQ on request.</p>
<p>Assessment of permittee-owned operations as described in Part IV.D.6.(b)(5)a.</p>	<p>No later than April 2026, the City of Woodway will evaluate 100% of operation and maintenance (O&M) activities for their potential to discharge pollutants in stormwater, including but not limited to each of the activities listed in Part IV.D.6.(b)(5)a of the general permit.</p> <p>A list of standard operations and maintenance (O&M) activities utilized by the City of Woodway will be developed as part of this evaluation and maintained with the SWMP.</p> <p>The list of O&M activities will be reviewed and, if necessary, updated at least one (1) time annually throughout the remainder of the permit term.</p>
<p>Identify pollutants of concern as described in Part IV.D.6.(b)(5)b.</p>	<p>No later than April 2027, the City of Woodway will identify pollutants of concern that could be discharged from 100% of the O&M activities listed under Part IV.D.6.(b)(5)a – (for example, metals; chlorides; hydrocarbons such as benzene, toluene, ethyl benzene, and xylenes; sediment; and trash.</p> <p>The list of O&M activities developed under the previous BMP will be updated with the pollutants of concern as they are identified.</p> <p>The list of pollutants of concern will be reviewed and, if necessary, updated at least one (1) time annually throughout the remainder of the permit term to address changes or additions to the O&M activities.</p>
<p>Pollution Prevention Measures as described in Part IV.D.6.(b)(5)c.</p>	<p>The City of Woodway will develop and implement a set of pollution prevention measures that will reduce the discharge of pollutants in stormwater from the above activities. These pollution prevention measures will include, but are not limited to:</p> <ul style="list-style-type: none"> ○ Replacing at least 50% of the City’s materials and chemicals with more environmentally friendly materials or methods by the end of the permit term, December 2029. ○ Tracking 100% of the application of deicing

	<p>and anti-icing compounds used in the City of Woodway, including a written record of the amount of compound used for each application annually, effective immediately.</p> <p>No later than April 2028, these and any additional pollution prevention measures will be put in writing and kept with the SWMP. The record will be updated to reflect changes as materials and methods are replaced.</p>
<p>Inspection of Pollution Prevention Measures as described in Part IV.D.6.(b)(5)d.</p>	<p>Effective immediately, the City of Woodway will conduct, at minimum, an annual review of 100% of the pollution prevention measures that have been implemented at City-owned facilities to ensure that they are adequate for the needs of the facility and functioning properly.</p> <p>Between the date of permit approval and December 2025, City staff will conduct a review of the inspection needs for all City-owned sites to determine appropriate frequency and procedures for each.</p> <p>No later than December 2026, the City will develop written procedures for each site in accordance with the needs established during the first permit year. These procedures will be kept with the SWMP, and a copy of the procedures for each site will be included in training materials for staff.</p> <p>Beginning in January 2027 and continuing throughout the remainder of the permit term, these procedures will be reviewed at least one (1) time annually to address any changes or additions to the pollution prevention measures.</p> <p>Effective immediately, 100% of inspections conducted at City-owned facilities will be logged electronically and available for review, The preferred logging method will be the electronic service order system currently used by the City, though an additional log will be created if necessary.</p>
<p>Structural Control Maintenance as described by Part IV.D.6.(b)(6).</p>	<p>Where BMPs for City-owned facilities include structural controls, the City of Woodway will perform maintenance as needed to ensure effectiveness.</p> <p>Between permit approval and December 2025, the</p>

	<p>City will, as part of its inspection at each facility, document structural controls which will require maintenance and, if needed, perform that maintenance.</p> <p>No later than February 2026, the City will develop a maintenance plan and schedule for all City-owned structural controls. The plan will include written procedures detailing steps for maintenance appropriate to each site and structural control. The schedule will be developed in accordance with each site's maintenance needs and will include no less than one (1) scheduled maintenance activity per year. This plan and schedule will be kept with the SWMP, and maintenance activities will be documented using the City's electronic service order system or similar log.</p> <p>The City will review and update all maintenance procedures at least one (1) time annually to address changes or additions to the pollution prevention measures.</p> <p>When new structural controls are installed, the City will incorporate them into the City's written plan for inspections and maintenance within 30 days.</p>
--	--