

October 25, 2016

CERTIFIED MAIL – 7013 2250 0002 1313 9986 RETURN RECEIPT REQUESTED

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

Re: Phase II MS4 Annual Report Transmittal for the City of Kyle MS4 TPDES Permit Authorization: TXR040490

Dear Team Leader:

This letter serves to transmit the City of Kyle's Permit Year 2 Annual Report for the Texas Pollutant Discharge Elimination System Small Municipal Separate Storm Sewer System General Permit, Authorization Number TXR040490 for the City of Kyle MS4.

A separate Notice of Change has been submitted to reflect <u>proposed up</u>dates/changes to the City of Kyle's Stormwater Management Plan (SWMP).

As required by the general permit, a copy of this submittal has also been mailed to the TCEQ Austin Region Office (MC-R11).

If you or members of your staff have any questions, please feel free to contact Kathy Roecker, Stormwater Management Plan Administrator, at (512) 262-3947.

Sincerely,

Scott Sellers City Manager

SS/kar

Cc:	Water Section Manager, TCEQ Austin Region Office (R11), P.O. Box 13087, Austin, Texas 78711-3087 Certified Mail – 7013 2250 0002 1313 9993
Enclosure:	Permit Year 2; Phase II (Small) MS4 Annual Report TCEQ-20561 City of Kyle • 100 W. Center Street • PO Box 40 • Kyle, Texas 78670
	http://www.cityofkyle.com/ • 512-262-1010 • Fax 512-262-3800

Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number TXR040000

A. General Information

Authorization Number: <u>TXR040490</u> Reporting Year (year will be either 1, 2, 3, 4, or 5): <u>Year 2</u> Annual Reporting Year Option Selected by MS4: <u>Permittee's Fiscal Year</u> Calendar Year: <u>2016</u> Permit Year: <u>Permit Year 2</u> Fiscal Year: <u>FY16</u> Last day of fiscal year: <u>September 30, 2016</u> Reporting period beginning date: <u>10/01/2015</u> Reporting period end date: <u>09/30/2016</u> MS4 Operator Level: <u>II</u> Name of MS4: <u>City of Kyle</u> Contact Name: <u>Kathy Roecker</u> Telephone Number: <u>(512) 262-3947</u> Mailing Address: <u>PO Box 40, Kyle, TX 78640</u> E-mail Address: <u>kroecker@cityofkyle.com</u> A copy of the annual report was submitted to the TCEQ Region YES_X_NO_

Region the annual report was submitted - <u>TCEQ Austin Region R11</u>

B. Status of Compliance with the MS4 GP and SWMP

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

	Yes	No	Explain
Permittee is currently in compliance with the SWMP as submitted to and approved by the TCEQ.	✓		
Permittee is currently in compliance with recordkeeping and reporting requirements.	\checkmark		
Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.)	√		Plum Creek, Segment 1810, has an approved Watershed Protection Plan.

2. Provide a general assessment of the appropriateness of the selected BMPs. You may use the table below: **See Appendix A**

MCM(s)	ВМР	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No, and explain.)
	. (

3. Describe progress towards reducing the discharge of pollutants to the maximum extent practicable. Summarize any information used (such as visual observation, amount of materials removed or prevented from entering the MS4, or if required monitoring data, etc.) to evaluate reductions in the discharge of pollutants. You may use the table: **See Appendix B**

МСМ	ВМР	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No, and explain.)

4. Provide the measurable goals for each of the MCMs, and an evaluation of the success of the implementation of the measurable goals: **See Appendix C**

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved If goal was not accomplished, please explain

C. Stormwater Data Summary

Provide a summary of all information used including any lab results (if sampling was conducted) to assess the success of the SWMP at reducing the discharge of pollutants to the MEP. For example, did the MS4 conduct visual inspections, clean the inlets, look for illicit discharge, clean streets, look for flow during dry weather, etc.? (Refer to the MS4 General Permit TXR040000 Part IV Section B.2.(b)) **See Appendix D**

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D.Impaired Waterbodies

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

The city is entering into the TCEQ Sanitary Sewer Overflow (SSO) Initiative which focuses on wastewater collection system and plant upgrades and improvements. Addressing SSOs can reduce the amount of bacteria entering Plum Creek.

 Describe the implementation of targeted controls if the small MS4 discharges to an impaired water body with an approved TMDL (Refer to the MS4 General permit TXR040000; Part II Section D.4.(a)):

Plum Creek does not have an approved TMDL but does have an approved Watershed Protection Plan. The City of Kyle is a member of the Plum Creek Watershed Partnership.

3. Report the benchmark identified by the MS4 and assessment activities (Refer to the MS4 General permit TXR040000; Part II Section D.4.(a)(6)): N/A

Benchmark Parameter	Benchmark Value	Description of additional sampling or other assessment	Year(s) conducted
(Ex: Total Suspended Solids)		activities	
		2	

 Provide an analysis of how the selected BMPs will be effective in contributing to achieving the benchmark (Refer to the MS4 General permit TXR040000; Part II Section D.4.(a)(4)): N/A

Benchmark Parameter	Selected BMP	Contribution to achieving Benchmark

5. If applicable, report on focused BMPs to address impairment for bacteria (Refer to the MS4 General Permit TXR040000; Part II Section D.4.(a)(5)): N/A

Description of bacteria-focused BMP	Comments/Discussion

6. Assess the progress to determine BMP's effectiveness in achieving the benchmark (Refer to the MS4 General Permit TXR040000; Part II.D.4.(a)(6)): N/A

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

- number of sources identified or eliminated;
- decrease in number of illegal dumping;
- increase in illegal dumping reporting;
- number of educational opportunities conducted;
- reductions in sanitary sewer flows (SSOs)
- increase in illegal discharge detection through dry screening

Benchmark Indicator	Description/Comments

E. Stormwater Activities

Describe stormwater activities the MS4 operator plans to undertake during the next reporting year. You may use the table below (Refer to the MS4 General Permit TXR040000 Part IV Section B.2.(d)): **See Appendix E**

MCM(s)	ВМР	Stormwater Activity	Description/Comments

F. SWMP Modifications

- Changes have been made or are proposed to the SWMP since the NOI or the last annual report, including changes in response to TCEQ's review.
 X_Yes___No
- If 'Yes', report on changes made to measurable goals and BMPs (Refer to the MS4 General Permit TXR040000 Part IV Section B.2.(e)):

MCM(s)	Measurable Goal(s) or BMP(s)	Implemented or Proposed Changes (Submit NOC as needed)
1	Stormwater Pamphlets	The city is currently using TCEQ, CAPCOG and GBRA outreach materials to convey the importance of stormwater quality and its effects on local streams, creek and rivers. However, pamphlets are discarded quickly generating waste; therefore, the city is researching other options to convey the same message but in a different format; considering digital.
2	Sanitary Sewer Line Maintenance and Inspection	The city will be participating in the TCEQ Sanitary Sewer Overflow Initiative which focuses on reducing sanitary sewer overflows from the collection system.

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

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

The city is submitting an NOC to address the proposed change to BMP 2 Stormwater Pamphlets to Stormwater Outreach; adding 2 additional receiving water bodies; and update the city's boundaries due to an annexation in 2016.

G.Additional BMPs for TMDLs and I-Plans

Provide a description and schedule for implementation of additional BMPs that may be necessary, based on monitoring results, to ensure compliance with applicable TMDLs and implementation plans (Refer to the MS4 General permit TXR040000 Part IV Section B.2.(f)). N/A at this time.

ВМР	Description	Implementation Schedule (Start Date etc.)	Status / Completion Date (completed, in progress, not started)

H. Additional Information

 Is the permittee relying on another entity to satisfy some of its permit obligations? (refer to the MS4 General Permit TXR040000 Part IV Section B.2.(g))

____ Yes <u>X</u> No

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

Name and Explanation:

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

____ Yes <u>X</u> No

2.b. If 'yes,' is this a system-wide annual report including information for all permittees?

____Yes ____No

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

Authorization Number: _____ Permittee:_____

I. Construction Activities

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 The number of construction activities that occurred in the jurisdictional area of the MS4 (Notices if intent and site notices received; Refer to the MS4 General Permit TXR040000 Part IV Section B.2.(h)) <u>Residential=551; Commercial=133</u>

2a. Does the permittee utilize the optional 7th MCM related to construction?

____ Yes <u>X</u> No

2b. If 'yes,' then provide the following information for this permit year (refer to the MS4 General Permit TXR040000 Part IV Section B.2.(i)):

The number of municipal construction activities authorized under this general permit	
The total number of acres disturbed for municipal construction projects	

Note: Though the seventh MCM is optional, implementation must be requested on the NOI or on a NOC and approved by the TCEQ.

J. Certification

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

Name (printed): <u>Mr. Scott Sellers</u>	Title: <u>City Manager</u>
Signature:	Date: 10-24-16
Name of MS4: <u>City of Kyle</u>	

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

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City of Kyle Phase II (Small) MS4 Annual Report; Year 2 TPDES Permit Number TXR040490

Appendix A

B.2 Status of Compliance with the MS4 GP and SWMP

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No, and explain.)		
	Construct Storm Water Management Page on City Website			
1 1		Yes; stormwater education and outreach is integral to reducing pollutants in stormwater.		
1	2	Stormwater Pamphlets Yes; the city is currently using various TCEQ, CAPCOG and GBRA outreach materials to convey the importance of stormwater quality and its effects on local streams, creeks and rivers. The city created a pamphlet; however, due to pamphlets being discarded quickly, the city is researching other options to convey the same message but in a different format; considering digital, directing people to the city's website.		
1	3	Utility Bill Insert Yes; utility bill inserts are an effective way to communicate the importance of stormwater quality b/c every resident and business in the city receives a utility bill. Since utility bill amounts can vary, most people open & read their utility bills.		
1	4	Storm Drain Stenciling or Markers Yes; marking storm drains brings awareness that what enters the storm drain does not go to a treatment plant for treatment, but discharges directly into our local waterways.		
1	5	General Education of City Employees Yes; educating city employees increases the number of "eyes" on the streets looking for potential issues/stormwater violations. Several issues have been referred/reported by trained city employees that resulted in inspections and violations.		
1	6	General Education of Elected and Appointed Officials Yes; the MS4 program is a federal and state mandated program; therefore, educating appointed and elected officials is important so they understand why a city is being tasked with new requirements as well as the importance of those requirements.		
1	7	City Inspector/Public Works Inspector Education and Training Yes; having well trained staff is key to protecting water quality.		
1	8	Developer/Builder/Engineer Education and Training Yes; educating contractors working within the city is important so expectations and requirements are set up front.		
1	9	Classroom Outreach Yes; educating future generations to the importance of protecting our natural resources is vital to the success of our MS4 program.		
1	10	Comply with State and Local Public Notice Requirements Yes; the city is following State & local public notice requirements.		
1	11	Public Meetings Yes; public meetings encourage participation and promotes awareness of stormwater quality.		
1	12	Stormwater Hotline Yes; providing easy access for the public to report issues assists in the early detection and prevention of illicit discharges in our waterways.		

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B.2 Status of Compliance with the MS4 GP and SWMP

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		Bulk Waste Cleanup Education
1	13	Yes; public awareness of options to dispose of bulk waste reduces the likelihood of illegal dumping.
1 14		Household Hazardous Waste Collection
		Yes; making the public aware of options to dispose of HHW reduces the likelihood of illegal
		dumping.
		Park Cleanup
		Yes; most of Kyle's parks are located near/along Plum Creek and/or its tributaries. Having an annual
1	15	park cleanup helps promote public participation and the importance of keeping out waterways
		clean.
1		Plum Creek Cleanup
1	16	Yes; having an annual park cleanup helps promote public participation and reiterates the
		importance of keeping our waterways clean.
		Pet Waste
	4.5	Yes; Plum Creek has a Watershed Protection Plan for bacteria. Educational outreach for picking up
1	17	pet waste is an important element for the city to help the reduction of bacteria making its way to
		Plum Creek and its tributaries.
		Create Stormwater System Map
2	18	Yes; knowing all of the city's inlets, outlets and storm drain system is imperative to
		tracking/identifying illicit discharges.
İ		Illicit Discharge Ordinance
2	19	Yes; adequate ordinances establish legal authority to conduct inspections, surveillance, monitoring
		and enforcement of stormwater discharges.
		Illicit Discharge Inspections
2 20		Yes; inspections are currently conducted on a complaint basis. The city is purchasing inspection
2	20	tracking software in FY17 to accurately track all inspections and be able to fully implement a routine
		inspection schedule.
		Sanitary Sewer Line Maintenance and Inspection
2	21	Yes; sewer line maintenance and inspections assist with the reduction of SSOs which can cause
		elevated levels of bacteria in receiving streams.
		Construction Site Storm Water Runoff and Erosion Control Ordinance
3	22	Yes; adequate ordinances establish legal authority to conduct inspections, surveillance, monitoring
		and enforcement of stormwater discharges.
		Review/Implement Site Plan Review Procedures
3	23	Yes; informing developers and site contractors of the city's new stormwater ordinance during
		preconstruction meetings is helpful to establish jobsite requirements before construction starts.
		Review/Implement Construction Inspection Procedures
3	24	Yes; inspections are currently conducted on a complaint basis. The city is purchasing inspection
		tracking software in FY17 to accurately track all inspections and be able to fully implement an
ļ		inspection schedule.
		Post Construction Storm Water Runoff Control Ordinance
4	25	Yes; adequate ordinances establish legal authority to conduct inspections, surveillance, monitoring
		and enforcement of stormwater discharges/requirements.

City of Kyle Phase II (Small) MS4 Annual Report; Year 2 TPDES Permit Number TXR040490

Appendix A

B.2 Status of Compliance with the MS4 GP and SWMP

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4	26	Develop and Implement Post Construction Structural and Non-Structural BMPs Yes; proper design and maintenance for structural and non-structural BMPs play an important role in the reduction of pollutants into our waterways.	
4	27	Stormwater Sampling Yes; stormwater sampling will help verify if BMPs are adequate or should be modified for greater protection.	
4	28	Land Use Plan Yes; surrounding land use around waterways can affect water quality.	
5	29	Municipal Operations and Industrial Activity Operations and Maintenance Program Yes; creating an operation and maintenance program with the goal of preventing or reducing pollutant runoff from municipal operations will assist with improving water quality in the receiving streams.	
5	30	Develop and Implement Training Program for City Employees to Minimize Runoff Caused by Municipal Operations Yes; educating city employees that use and store chemicals, products and by-products is critical in ensuring proper precautions are taken with the handling and storage of said chemicals. Proper storage and handling ensures chemicals do not end up in the city's storm drain system and waterways.	
5	31	Chemical Applications and Materials Management Yes; proper chemical applications and materials management is important in protecting water quality.	
5	32	Storm Sewer System Maintenance Yes; maintaining storm drainage systems is key to making sure debris and pollutants do not end up in our waterways.	
5	33	Street Sweeping Yes; maintaining clean streets ensures excess pollutants do not runoff into storm drains.	
5	34	Structural Control Maintenance Yes; structural controls maintenance ensures the structures function properly during storm events.	
5	35	Spill Response Yes; being knowledgeable with spill response and reporting procedures is important to ensuring spills are properly and adequately abated in a timely manner.	
5	36	Disposal of Collected Storm Sewer System Waste Yes; proper disposal of waste is important to ensure it doesn't end back up in our waterways.	

City of Kyle Phase II (Small) MS4 Annual Report; Year 2 TPDES Permit Number TXR040490 Appendix B

B.3 Status of Compliance with the MS4 GP and SWMP

МСМ	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No, and explain.)
1	21	Bacteria	Unknown	N/A	Yes; the city is entering into the TCEQ SSO Initiative which will assist in a reduction of SSOs from the wastewater collection system. A reduction in SSOs will reduce bacteria allowed to enter Plum Creek.
1	21	Bacteria	Unknown	N/A	Yes; under a current wastewater collection system upgrade, the city is removing five (5) On-Site Sewage Facilities (OSSFs) putting them on the city's sanitary sewer system.

City of Kyle Phase II (Small) MS4 Annual Report; Year 2 TPDES Permit Number TXR040490 Appendix C

B.4 Status of Compliance with the MS4 GP and SWMP

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved
		If goal was not accomplished, please explain
1	Construct Storm Water Management Page on City Website.	Met; site went live January 5, 2016.
1	Stormwater Pamphlets	The city created a pamphlet but after researching costs and benefits, it was determined that money would be better spent on directing people to the city's website which contains the same information as the pamphlet. Updating SWMP MCM 1, BMP 2 from Stormwater Pamphlet to Stormwater Outreach; researching better options for public education and outreach materials.
1	Utility Bill Insert	Met; included in April 2016 utility bills.
1	Storm Drain Markers	Meeting/ongoing
1	General Education of City Employees	Met; conducted on May 12, 2016.
1	General Education of Elected and Appointed Officials	Met; conducted on February 2, 2016.
1	City Inspector/Public Works Inspector Education and Training	Met; conducted on February 2, 2016.
1	Developer/Builder/Engineer Education and Training	Meeting/ongoing
1	Classroom Outreach	Goal for Years 4-5; researching options
1	Comply with State and Local Public Notice Requirements	Met; public notice was given in the Hays Free Press on February 10, 2016 for the creation of the Stormwater Ordinance.
1	Public Meetings	Meeting; public meetings are held as needed and outlined in the city's SWMP. Citizens Comment Period is conducted at every City Council meeting.
1	Stormwater Hotline	Met; the city is using the CAPCOGs 1-877-NO DUMPS hotline to report issues as well as an online complaint form.
1	Bulk Waste Cleanup Education	Met; information was included in the April 2016 utility bill insert.

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B.4 Status of Compliance with the MS4 GP and SWMP

1	Household Hazardous Waste	Met; information was included in the April 2016 utility bill insert.
	Collection	
1	Park Cleanup	Met; the park/Plum Creek cleanup was changed this last year due to the Halloween flood. After the flood, trash and debris was removed; therefore, the cleanups were replaced with an educational event-the Spring Break Clean & Green.
1	Plum Creek Cleanup	Met; the park/Plum Creek cleanup was changed this last year due to the Halloween flood. After the flood, trash and debris was removed; therefore, the cleanups were replaced with an educational event-the Spring Break Clean & Green.
1	Pet Waste	Meeting/ongoing
2	Create Storm Water System Map	Meeting/ongoing
2	Illicit Discharge Ordinance	Met; passed by City Council February 16, 2016.
2	Illicit Discharge Inspections	Illicit discharge inspections are being conducted on a complaint basis. The city is getting inspection tracking software in FY17 which will use GIS allowing the city to more accurately track all inspections.
2	Sanitary Sewer Line Maintenance and Inspection	Meeting/ongoing; sanitary sewer line maintenance and inspections are completed by the city's Public Works Department. The city is in the process of joining the TCEQ Sanitary Sewer Overflow (SSO) Initiative which will outline a routine maintenance schedule.
3	Construction Site Storm Water Runoff and Erosion Control Ordinance	Met; passed by City Council February 16, 2016.
3	Review/Implement Site Plan Review Procedures	Meeting; conducting reviews & requirements during preconstruction meetings.
3	Review/Implement Construction Inspection Procedures	Construction inspections are being conducted on a complaint basis. The city is getting inspection tracking software in FY17 which will use GIS allowing the city to more accurately track all inspections.
4	Post Construction Storm Water Runoff Control Ordinance	Met; passed by City Council February 16, 2016.

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B.4 Status of Compliance with the MS4 GP and SWMP

	Develop and Implement Post	Meeting; the city currently uses the City of Austin Drainage
4	Construction Structural and Non-	Criteria Manual for structural and non-structural BMP
	Structural BMPs	requirements.
		In process; the city will be working with the Plum Creek
4	Stormwater Sampling	Watershed Partnership and GBRA to determine sample
		locations.
1	1	In process; assessing surrounding land use along Plum Creek.
4	Land Use Plan	
	Municipal Operations and Industrial	In process; developing a plan to evaluate municipal operations.
5	Activity Operations and	
	Maintenance Program	
	Develop and Implement Training	Met; training conducted in February & May 2016.
5	Program for City Employees to	
5	Minimize Runoff Caused by	
	Municipal Operations	
	Chemical Applications and Materials	In process; developing a plan identifying chemicals used in
5	Management	municipal operations are handled and stored as required.
	Mundgement	
		Met; storm sewers are currently maintained as needed. In FY17,
	Storm Sewer System Maintenance	the City Council will be voting on a Storm Drain & Flood Risk
5		Mitigation Utility which, if passed, will create a consistent
		funding mechanism for scheduled maintenance of the storm
	·	drain system.
		Met; the city averaged 135 miles swept per month. The city is
5	Street Sweeping	budgeting for a new, second street sweeper to be purchased in
		FY18.
		In process; developing a plan for the inspection and
5	Structural Control Maintenance	maintenance of city maintained structural controls.
		Met; Stormwater Management Plan Administrator attended
5	Spill Response	OSHA 8 Hour Refresher in February 2016. Developing spill
		response procedures and training to assist the FD on spill
		responses.
_	Disposal of Collected Storm Sewer	Met; the city disposed of 92,700 pounds of trash/debris at the
5	System Waste	TDS landfill, TCEQ MSW Permit No. 2123.

City of Kyle Phase II (Small) MS4 Annual Report; Year 2 TPDES Permit Number TXR040490 Appendix D

C. Stormwater Data Summary

MCM(s)	BMP	Stormwater Activity	Success of BMP at Reducing Pollutants
2	20	Illicit Discharge Inspections	This BMP will be fully implemented by the end of Year 3. Currently, illicit discharge inspections are being conducted on a complaint basis. The city is getting inspection tracking software in FY17 which will use GIS allowing the city to more accurately track all inspections. Conducting wet and dry weather inspections of storm drain outfalls will be included with the implementation of this BMP.
4	27	Stormwater Sampling	This BMP will be fully implemented by the end of Year 3. The city is working with the Plum Creek Watershed Partnership and GBRA to determine sample locations; however, full implementation of this BMP is ongoing.
4	28	Land Use Plan	This BMP will be fully implemented by the end of Year 4. The city is assessing surrounding land use along Plum Creek; however, full implementation of this BMP is ongoing.
5	32	Storm Sewer System Maintenance	The city is currently (November 2016) proposing a Storm Drain & Flood Risk Mitigation Utility that would provide a dedicated funding source to focus on drainage and the city's storm drain system. If approved, a scheduled routine maintenance program will be established in FY18. Currently, the city addresses storm drain maintenance as needed.
5	33	Street Sweeping	Street sweeping is conducted monthly and records of the areas swept are maintained in a log. Routine street sweeping prevents sediment, debris and trash from entering the storm drain system and receiving waters.
5	26	Structural Control Maintenance	This BMP will be fully implemented by the end of Year 3. The city is developing a plan for the inspection and maintenance of city maintained structural controls; however, full implementation of this BMP is ongoing.

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E. Stormwater Activities

MCM(s)	BMP	Stormwater Activity	Description/Comments
1	9	Classroom Outreach	Goal for Years 4-5; researching options.
2	20	Illicit Discharge Inspections	Goal for Years 4-5; illicit discharge inspections are being conducted on a complaint basis. The city is getting inspection tracking software in FY17 which will use GIS allowing the city to more accurately track all inspections.
3	24	Review/Implement Construction Inspection Procedures	Goal for Year 4; construction inspections are being conducted on a complaint basis. The city is getting inspection tracking software in FY17 which will use GIS allowing the city to more accurately track all inspections.
4	27	Stormwater Sampling	The city is working with the Plum Creek Watershed Partnership and GBRA to determine sample locations; however, full implementation of this BMP is ongoing.
4	28	Land Use Plan	The city is assessing surrounding land use along Plum Creek; however, full implementation of this BMP is ongoing.
5	29	Municipal Operations and Industrial Activity Operations and Maintenance Program	The city is developing a plan to evaluate municipal operations; however, full implementation of this BMP is ongoing.
5	31	Chemical Applications and Materials Management	The city is developing a plan identifying chemicals used in municipal operations are handled and stored as required; however, full implementation of this BMP is ongoing.
5	26	Structural Control Maintenance	The city is developing a plan for the inspection and maintenance of city maintained structural controls; however, full implementation of this BMP is ongoing.
5	35	Spill Response	The city is developing spill response procedures and training to assist the FD on spill responses; however, full implementation of this BMP is ongoing.