



“Been there, Done That: How You’re Already Complying with MS4 Requirements Without Knowing it”

BY: Camila Biaggi, ENV SP, CFM
Liz Stone, CESSWI, CPESC

January 16th, 2025



Today's Agenda

Introduction

Background on Small Phase II MS4 Requirements

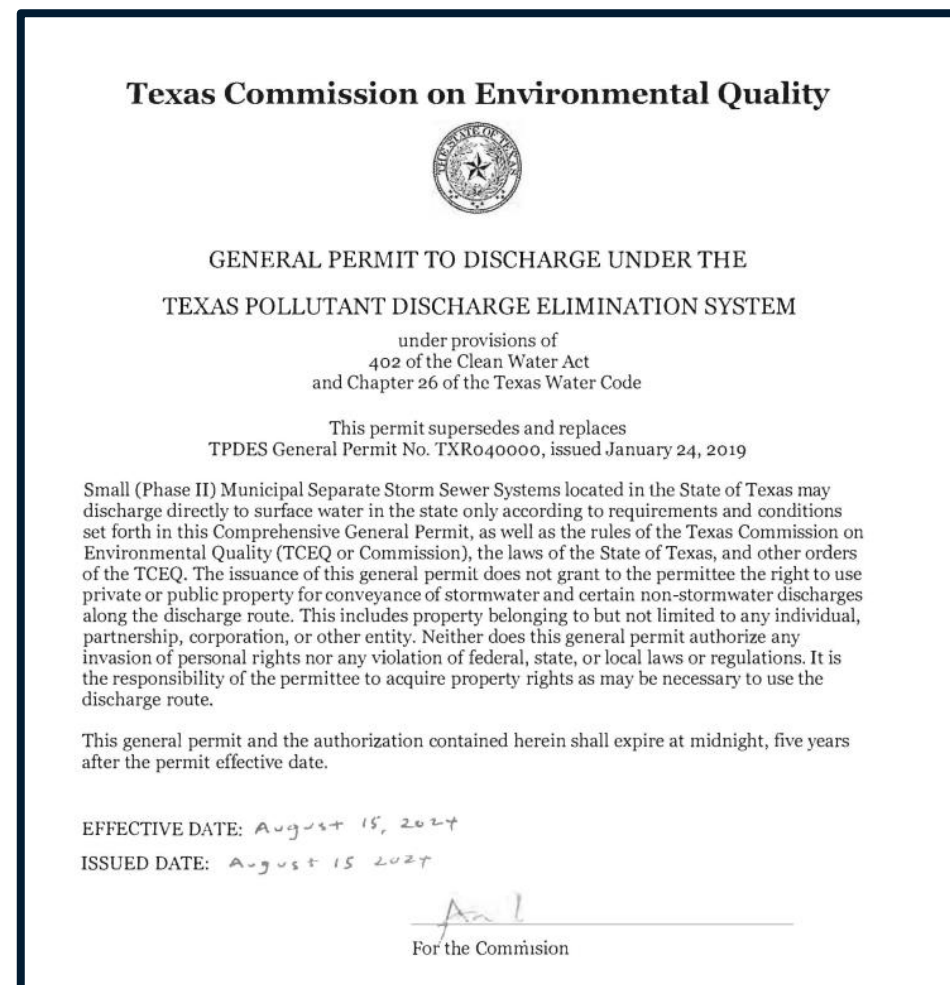
Leveraging Existing Practices

Steps to Build a Compliant SWMP

Conclusion & Key Takeaways

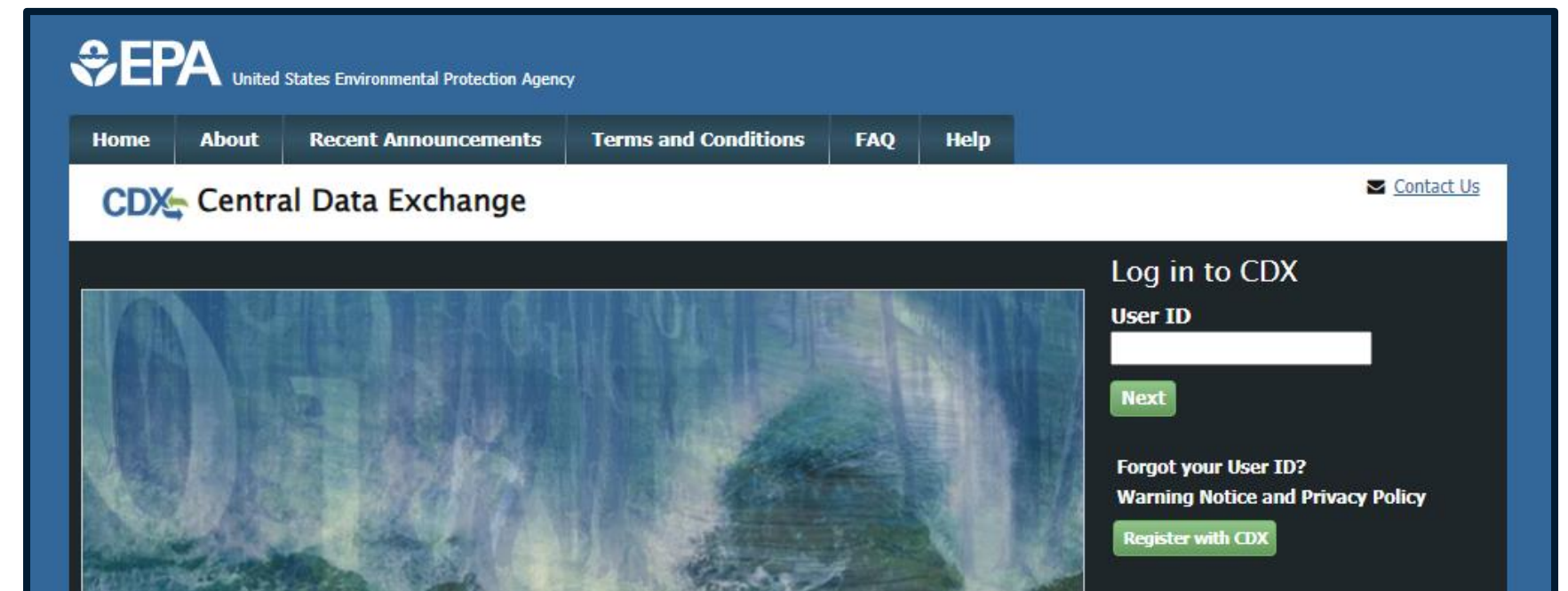
Overview on Small (Phase II) MS4 Requirements

- TCEQ 2024 General Permit Renewal
August 14, 2024
- Incorporating the new changes according to assigned level (Level 1-4)



❖ Minimum Control Measures (MCMs)

1. Public Education and Outreach
2. Public Involvement/Participation
3. Illicit Discharge Detection and Elimination (IDDE)
4. Construction Site Stormwater Runoff Control
5. Post-Construction Stormwater Management
6. Pollution Prevention and Good Housekeeping



TCEQ Letter Dated December 30, 2024

Jon Niermann, *Chairman*
Bobby Janecka, *Commissioner*
Catarina R. Gonzales, *Commissioner*
Kelly Keel, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 30, 2024

Subject: Newly Regulated MS4s Based on the 2020 Census and
2024 Phase II (Small) MS4 General Permit (TXR040000)

Dear New MS4:

You are receiving this letter because all or part of your municipal separate storm sewer system (MS4)¹ has been identified as being located within an *urban area with a population of 50,000 or more people* according to the 2020 Decennial Census². As such, if you *own or operate* an MS4, your MS4 is regulated under the purview of the Clean Water Act's stormwater permitting regulations found at 40 CFR §122.32(a)(1) that state that an MS4 is automatically regulated if it "is located in an urban area with a population of 50,000 or more people as determined by the latest Decennial Census by the Bureau of the Census." As a regulated small MS4, you are required to obtain coverage under the Texas Pollutant Discharge Elimination System (TPDES) 2024 Phase II MS4 General Permit, TXR040000, to reduce pollutants in stormwater discharges from your MS4.

Our records indicate that we have not received an application from your MS4 to obtain coverage under the TPDES Phase II MS4 General Permit, issued on August 15, 2024. This is a courtesy reminder that you must submit a Notice of Intent (NOI) or Waiver application to obtain coverage under this general permit. All applications must be submitted to TCEQ by **February 11, 2025**.

The specific contents of the NOI, including the development, implementation, and enforcement of a Stormwater Management Program (SWMP) to reduce the discharge of pollutants from the MS4, and Waiver³ eligibility requirements can be found in the TPDES Phase II MS4 General

¹ An MS4 is defined as "a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains)" owned by a

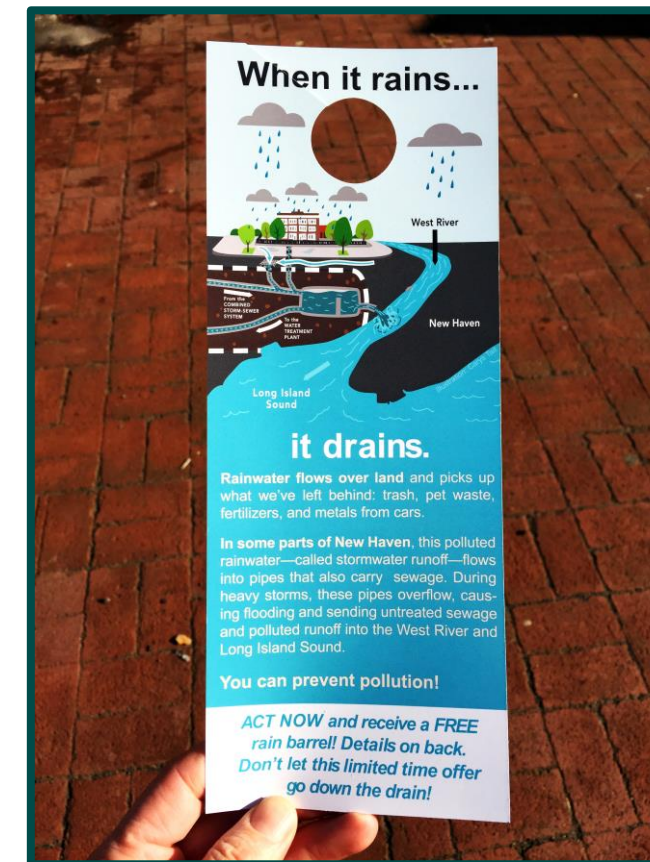
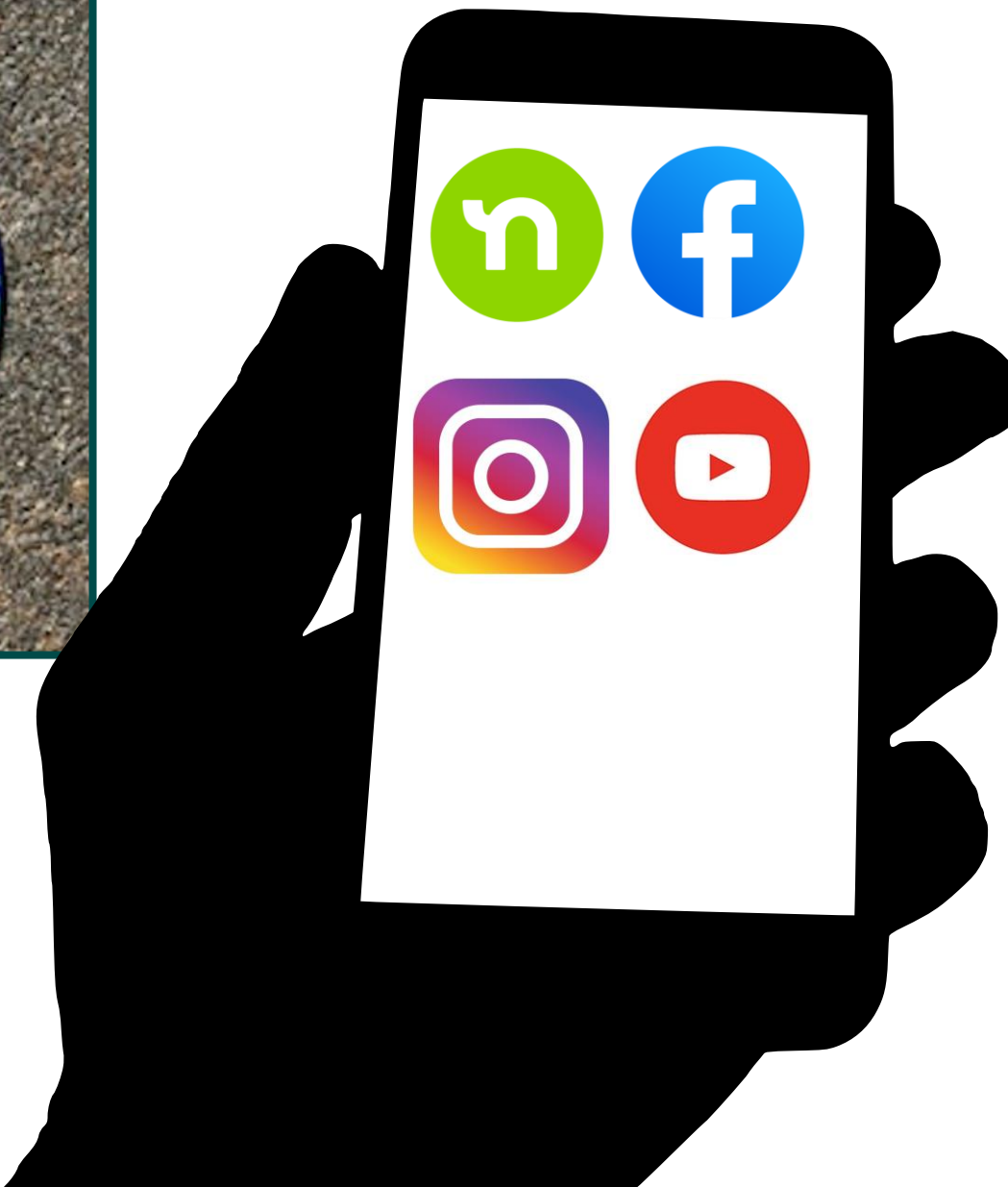
Leveraging Existing Practices

- **MCM 1- Public Education & Outreach**
 - Small MS4 Level 2A/2B- Must Choose 4 BMPs

MCM 1 – PUBLIC EDUCATION AND OUTREACH		
SMALL MS4 LEVEL 2A/2B - MUST CHOOSE 4 BMPS 1.1 – 1.9		
BMP	MEASURABLE GOALS	
1.1	Information on the MS4 Operator's website. Utilize MS4 Operator's Website. {REQUIRED, IF HAVE WEBSITE}	All links shall be checked, and the page shall be updated as necessary at a minimum of once annually. <ul style="list-style-type: none"> • Must post SWMP by 30 days after NOI approval • Must post Annual Reports by 30 days after due date
1.2	Social media posts, social media campaign.	Post at a minimum of four times each year on a minimum of one social media platform (messages shall be seasonally appropriate). Must make a minimum of one post per quarter and all quarterly posts must be visible by attendees for the full year, each year.
1.3	Storm Drain Marking	A minimum of 10% of all known stormwater inlets should be marked each year . Where all known stormwater inlets have been marked, MS4 Operator will inspect and maintain the markers for a minimum of 15% of all known stormwater inlets in the MS4 area each year.
1.4	Media/advertising campaign/public service announcements in areas of high visibility: Billboard/poster; Bus shelter/bench; radio/television/movie theatre; and kiosks.	Advertisement must be active for a minimum of three weeks each year ; or must have an estimated public exposure for the duration of the advertising campaign that is equal to twice the population for the small MS4 area (based on the most recent U.S. Census Bureau decennial population value for the small MS4 area).
1.5	Publish articles in local newspaper or newsletter, may be electronic.	A minimum of two articles must be published or emailed to target audience groups each year.
1.6	Fact sheets/brochures/ utility bill inserts/door hangers.	The number of fact sheets, brochures, bill inserts, door hangers, or handouts distributed each year shall at a minimum be enough to reach at least 75% of the intended audience.
1.7	Permanent stormwater related signage.	Signage will count as an annual BMP for the year it was put in place and for each subsequent year of this permit cycle as long as each of those years, the permittee inspects and maintains, as necessary, 100% of the signage once annually.
1.8	Promote, host, or develop educational meetings, seminar, or trainings.	Hold, host, or promote a minimum of one event annually.
1.9	Targeted education campaign via mail, email, or in person.	A minimum of one campaign annually or with a specific event to reach at least 75% of the intended audience.

Leveraging Existing Practices Continuation

- **MCM 1- Public Education & Outreach**
 - Small MS4 Level 2A/2B- Must Choose 4 BMPs



Leveraging Existing Practices

- **MCM 2- Public Involvement/Participation**
 - Small MS4 Level 2A/2B- Must Choose 3 BMPs

MCM 2 – PUBLIC INVOLVEMENT/PARTICIPATION		
SMALL MS4 LEVEL 2A/2B - MUST CHOOSE 3 BMPS 2.1 – 2.8		
	BMP	MEASURABLE GOALS
2.1	Stream/lake or watershed clean-up events; litter/trash clean-up events such as Texas Stream Team, Adopt-A-Highway, Adopt-A-Spot, Adopt-A-Street, Adopt-A-Stream, etc.	Host a minimum of <u>one event annually</u> .
2.2	Habitat improvement; Tree planting; Invasive Vegetation removal; Stream restoration.	Host a minimum of <u>one event annually</u> .
2.3	Volunteer water quality monitoring.	Host a minimum of <u>one event annually</u> .
2.4	Stormwater related speaker series.	Provide a minimum of <u>one session each year</u> .
2.5	MS4 Survey.	Provide a minimum of <u>one public survey annually</u> for input on the program implementation to be distributed to reach at least 75% of the intended audience.
2.6	Hold events to train residents or work a project for homeowner associations (HOAs), or other public groups to cover stormwater topics.	Provide a minimum of <u>one project or training annually</u> . Examples: Building rain barrels; Fertilizer application training; Rain garden/bio retention creation or maintenance; How to recognize illicit discharge activities and communicate observations to appropriate MS4 staff.
2.7	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.	Provide a minimum of <u>one booth or display annually</u> .
2.8	Public Meeting.	Host a minimum of <u>one meeting annually</u> for input on the program implementation to be advertised to reach at least 75% of the intended audience.

Leveraging Existing Practices Continuation

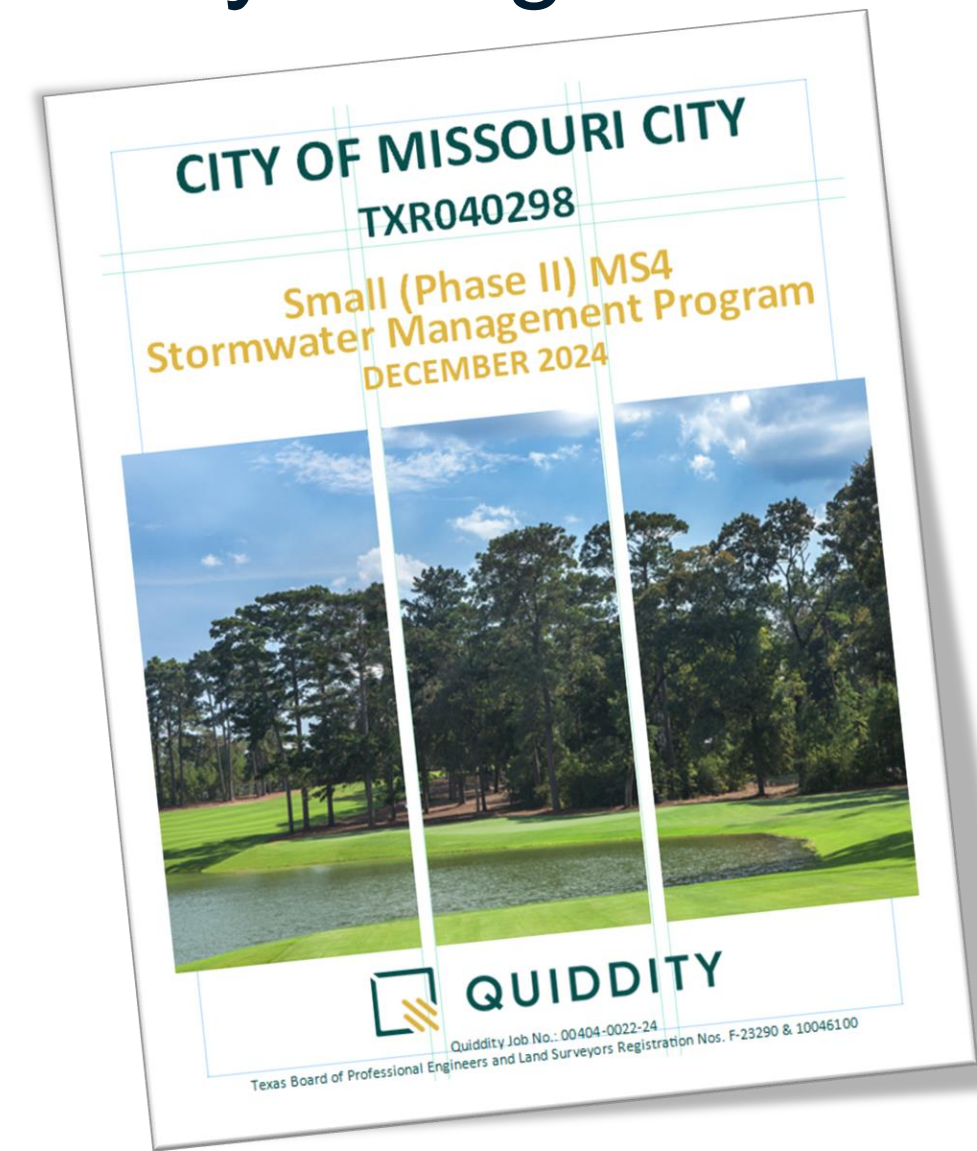
- **MCM 2- Public Involvement/Participation**
 - Small MS4 Level 2A/2B- Must Choose 3 BMPs



Steps to Build a Compliant SWMP

- Three Steps:

1. Conduct a self-assessment
2. Identify Existing Initiatives
3. Organize and Document what you're already doing



Steps to Build a Compliant SWMP Continuation

- **Focus on items to enhance your 5 Year Program**
- **Plan with Available Resources- Align with MCMs**
- **Write out a comprehensive SWMP for your entity to meet General Permit requirements**
- **Can submit a Notice of Change(NOC) if needed**
- **Friendly Reminder! Submit NOI by February 11, 2025**

An aerial photograph of a city, likely New York City, showing a river in the foreground, a large building in the background, and a dense urban landscape. The image is overlaid with a dark teal gradient.

Conclusion & Key Take Aways

- **Leverage on Existing Practices**
- **Build on What You're Already Doing**
- **Maximize Resources**
- **Engage Your Community**
- **Collaboration- Successful Compliance**
- **Ongoing Program Development**
- **NOI Submittal**



Liz Stone, CESSWI, CPESC
MS4 Technical Manager

Lstone@quiddity.com

281-363-4039



Camila Biaggi, ENV SP, CFM
Water Quality Specialist

cbiaggi@quiddity.com

346-231-0910

Customized Stormwater Management Program

Our team specializes in developing customized Stormwater Management Programs (SWMPs), helping organizations accurately interpret technical regulations and navigate the permit application and implementation processes while providing comprehensive technical guidance on stormwater quality.



Specialized Subject Matter Expert Assistance

- ✓ Customizing a public education program
- ✓ Qualified inspectors - illicit discharge, construction, & municipal
- ✓ Required annual training
- ✓ Creating/revising ordinances and rate orders
- ✓ TMDL / I-Plan requirements
- ✓ Assisting with TCEQ investigations (audits)
- ✓ Evaluating your current programs and identifying areas for improvement
- ✓ Waiver qualification



15+ Years

Assisting municipalities and cities achieve MS4 compliance



100% Compliance

TCEQ reports retained and ZERO violations issued for all MS4 clients

Contact our team today for help ensuring your organization is MS4 ready!

P: 281.363.4039 | WWW.QUIDDITY.COM

Liz Stone, EIT, CPESC, CESSWI
LStone@quiddity.com

Michael Gurka, PE
MGurka@quiddity.com

Camilia Biaggi, ENV SP, CFM
CBiaggi@quiddity.com

THANK YOU

