



**TPDES PHASE II (SMALL) MS4 GENERAL PERMIT  
TERM 3, YEAR 1 ANNUAL REPORT**

*ASSIGNED PERMIT NO. TXR040092*

**TPDES PERMIT - TXR040000**

**ALLEN CITY COUNCIL**

KURT KIZER, COUNCILMEMBER PLACE NO. 1

CARL CLEMENCICH, COUNCILMEMBER PLACE NO. 2

LAUREN DOHERTY, COUNCILMEMBER PLACE NO. 3

CHRIS SCHULMEISTER, COUNCILMEMBER PLACE NO. 4

GARY CAPLINGER, MAYOR PRO TEM PLACE NO. 5

BAINÉ BROOKS, COUNCILMEMBER PLACE NO. 6

**YEAR 1 PHASE II (SMALL) MS4 ANNUAL REPORT**

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**YEAR 4 PHASE II (SMALL) MS4 ANNUAL REPORT**

**TPDES General Permit Number TXR040000**

**A. General Information**

Authorization Number: TXR040092 Annual Report Year: YEAR 1 (Calendar Year)  
MS4 Operator Level: Level 3 Name of MS4/Permittee: City of Allen, Texas  
Report Period Begin: January 01, 2019 Report Period End: December 31, 2019  
Contact Name: William Nahas Telephone Number: (214) 509-4585  
Mailing Address: 305 Century Parkway, Allen, Texas, 75013-8042  
Email Address: wnahas@cityofallen.org

A hard copy of the annual report was submitted to the TCEQ Regional Office YES  No

Region the annual report was submitted: TCEQ Region 4 – Dallas / Fort Worth

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

- 1) **Status:** Provide information on the status of complying with permit conditions: (TXR040000 Part IV.B.2) Please Reference *Table C.1*.

*Table C.1*

DESCRIPTION	YES	NO	EXPLAIN
Permittee is currently in compliance with the SWMP as submitted to and approved by the TCEQ.	X		Compliance to the conditions of the SWMP were achieved.
Permittee is currently in compliance with the record keeping and reporting requirements.	X		All records will be kept for a period of three years. The SWMP and NOI are available to the public upon request during regular business hours.
Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.)	X		Where applicable, eligibility requirements of the permit are met.
Permittee conducted an annual review of its SWMP in conjunction with preparation of the annual report	X		Compliance with conducting an annual review of the SWMP in conjunction with preparing the annual report was completed.

2) **BMP Status:** Provide a general assessment of the appropriateness of the selected BMP's. Please Reference *Table C.2*.

Table C.2

MCM	BMP	BMP Activity	BMP is appropriate for reducing the discharge of pollutants in stormwater (yes or no). Explain.
<b>MCM 1 – Public Education, Outreach and Involvement</b>			
1	1. Adopt-A-Waterway	A. Continue Adopt-A-Waterway program and measure the participation and miles of waterways adopted.	Yes, continued effort to educate the public on the importance of this program and continued participation in clean-up efforts.
1	2. Children's Program	A. Make 12 presentations per year targeting children and youth audiences.	Yes, continuing to educate our children and youth is the first step to ensure future stormwater protection.
		B. Promote the participation of at least 10 youth groups in community cleanup programs on an annual basis.	
		C. Hold an art contest twice a year about environmental topics.	
1	3. Education and Training on Illicit Discharges	A. Develop a list of City staff and training materials to be used for illicit discharge detection education.	Yes, by educating the staff and providing training materials it provides a better understanding of illicit discharge determination in the community.
		B. Provide training for City staff and document attendees and training materials used.	
1	4. Household Hazardous Waste Program	A. Distribute HHW educational materials to the public.	Yes, allowing residents the ability to schedule pick-up or drop-off of reusable household hazardous waste reduces the risk of pollution.
		B. Provide curbside service in which the City will pick up hazardous waste from a resident if requested.	
1	5. Keep Allen Beautiful	A. Schedule monthly KAB Board meetings to organize cleanup events and other beautification activities.	Yes, having the KAB committee as a resource allows different avenues to reach out to residents teaching the importance of a clean environment and helps reduce the risk of pollution.
		B. Hold a minimum of 4 KAB events per year.	
		C. Track annual distribution of KAB event information.	
1	6. Media Coverage	A. Provide two (2) media articles about the City's renewed SWMP.	Yes, stormwater education is being delivered to all viewers of the City cable channel, stormwater education is provided to all new residents, and educational material is delivered to a wide audience using social media. The City utilizes Facebook, Twitter, and a YouTube channel to distribute educational information and promote City events.
		B. Provide each resident that opens a new water account with a welcome packet with stormwater educational material, including the Stormwater Brochure.	
		C. Air a quarterly stormwater video or demonstration on the City cable channel.	
		D. Assess the value of social media and track, if used.	

Table C.2 cont'd

MCM	BMP	BMP Activity	BMP is appropriate for reducing the discharge of pollutants in stormwater (yes or no). Explain.
1	7. Municipal Employee Training Program	<p>A. Review current training program and make any necessary changes, updates, etc.</p> <p>B. Conduct training for designated employees.</p>	Yes, municipal employees are the “eyes and ears” in the field each day. Training these individuals to recognize and report illicit discharges has resulted in several cases of cleanup.
1	8. Pet Waste Management	<p>A. Continue enforcement of pet waste ordinance.</p> <p>B. Develop a brochure with educational information about pet waste.</p> <p>C. Distribute pet waste brochure for all new adoptions.</p>	Yes, enforcement of the pet waste ordinance has increased public awareness. When information is delivered in an informative and aesthetically pleasing medium, it is more likely to get attention. Staff continues to hand out brochures for adoptions educating new pet owners.
1	9. Regional Partnerships	<p>A. Provide funding to NCTCOG to develop regional stormwater initiatives. Attend scheduled regional meetings and document City participation in regional programs.</p> <p>B. Consider continuing the funding commitment to NCTCOG each year and document annual City participation.</p>	Yes, the City continues to participate with NCTCOG, and utilize many of the programs offered by the NCTCOG to educate employees and distribute educational material to the public.
1	10. Restaurant Education	<p>A. Research options for educational material targeting restaurants.</p> <p>B. Provide the pollution prevention education to all application restaurants in the City via website.</p>	Yes, it will educate restaurants about their impact on stormwater quality and best management practices they should follow.
1	11. Storm Drain Marking	A. Inspect 1/6 of the City's inlets each year to identify remaining inlets to be marked and/or damaged markers to be replaced.	Yes, provide markers on all storm inlets, notifying public/ residents about pollution prevention. Every fifth marker is in Spanish.
1	12. Stormwater Program Education	<p>A. Distribute the City of Allen stormwater brochure and track the approximate number of brochures sent through the water bills. Also, include the brochure in a welcome package for new Allen residents.</p> <p>B. Consider other educational materials, promotional giveaways, or handouts to be distributed and track the approximate number handed out.</p>	Yes, education about stormwater protection is being delivered to the residents in a variety of ways presented in Table C.4.
<b>MCM 2 – Illicit Discharge Detection and Elimination</b>			
2	13. Storm Drainage System Map	A. Annually update the storm drainage system map using record drawings submitted for any new development or redevelopment projects.	Yes, this information is used for a variety of purposes including storm water discharge investigation and new or CIP development design.

Table C.2 cont'd

MCM	BMP	BMP Activity	BMP is appropriate for reducing the discharge of pollutants in stormwater (yes or no). Explain.
2	14. Education and Training on Illicit Discharges	<p>A. Develop a list of City staff and training materials to be used for illicit discharge detection education.</p> <p>B. Provide training for City staff and document attendees and training materials used.</p>	Yes, by educating City staff it will help with illicit discharge detection and clean-up.
2	15. Public Reporting & Response Procedures	<p>A. Maintain public reporting/input phone number and information on the City website and in other printed materials.</p> <p>B. Document reports received, and any corrective actions taken.</p> <p>C. Develop on-site procedures for responding to illicit discharges and spills.</p>	Yes, a universal phone number for reporting and input is necessary in simplifying information and distinguishing the City's stormwater program apart from other on call services. Having a reporting mechanism in place allows the City to track stormwater issues and resolutions.
2	16. Source Investigation and Elimination	<p>A. Review current City illicit discharge ordinance and TCEQ requirements for source investigation and elimination requirements. Prepare ordinance changes, if necessary.</p> <p>B. Develop written procedures for responding to illicit discharges including inspections, investigations, and corrective actions.</p> <p>C. Implement the illicit discharge source investigation and elimination procedures. Document all reports and responses.</p>	Yes, the City created an ordinance that was adopted and continues to investigate ways to increase its effectiveness.
2	17. Detection and Elimination of Illicit Sanitary Sewer Discharges	<p>A. Evaluate budget and, if feasible, perform sanitary sewer line maintenance, rehabilitations and replacement projects as needed.</p> <p>B. Track locations and/or design of completed projects if the budget allows.</p>	Yes, by maintaining the sanitary sewer system, the chance for illicit flows is decreased. Tracking locations of sewer rehabilitation assists City staff with identifying new areas of concern.
<b>MCM 3 – Construction Site Stormwater Runoff Control</b>			
3	18. Erosion & Sediment Control Requirements	<p>A. Review and amend, if necessary, the current City stormwater management ordinance for compliance with the renewed TCEQ permit.</p> <p>B. Adopt and enforce the stormwater management ordinance.</p>	Yes, up to date ordinance language ensures a clear message to the public.
3	19. Construction Plan Review Procedures	<p>A. Review and amend, if necessary, existing erosion control plan review procedures for compliance with the renewed TCEQ permit and the City's stormwater management ordinance.</p> <p>B. Administer the review process for all new regulated construction projects.</p>	Yes, a current erosion control plan checklist is in place to meet the permit and ordinance requirements.

Table C.2 cont'd

MCM	BMP	BMP Activity	BMP is appropriate for reducing the discharge of pollutants in stormwater (yes or no). Explain.
3	20. Construction Site Inspections and Enforcement	<p>A. Review and amend, if necessary, the existing inspection procedures for erosion and sediment controls in compliance with the renewed TCEQ permit.</p> <p>B. Administer the inspection and enforcement program and document construction site inspections performed and any follow-up actions.</p>	Yes, current inspection procedures are in place to meet the permit and ordinance requirements.
3	21. Construction Site Stormwater Education	A. Provide the construction site erosion control education guideline to contractors and homebuilders at preconstruction meetings or with the building permit and make the brochure available at the City permitting office.	Yes, information is distributed and available at the City to educate contractors on erosion control measures and requirements.
3	22. Construction Stormwater Training	<p>A. Review current training program and make any necessary changes, including employees to be trained, a training schedule, and training materials and methods.</p> <p>B. Implement and track the training program for designated employees.</p>	Yes, by tracking the training it will ensure employees are knowledgeable and up to date with the program.
3	23. Construction Site Inventory	A. Develop and maintain an inventory list of active regulated construction projects.	Yes, this list makes it easier to monitor active construction sites and areas for potential stormwater impacts.
<b>MCM 4 – Post-Construction Stormwater Management in New Development &amp; Redevelopment</b>			
4	24. Inspector Training	A. Provide training annually. Evaluate and update inspector materials and methods each year.	Yes, allows staff to re-familiarize themselves with old/new materials and construction methods.
4	25. Long-Term Maintenance of Post-Construction BMPs	<p>A. Develop requirements for the long-term operation and maintenance of structural controls installed on development sites.</p> <p>B. Implement the post-construction maintenance program.</p>	Yes, developing these requirements will help reduce potential impacts.
4	26. Post-Construction Ordinance	<p>A. Review existing stormwater management ordinance and adopt any necessary changes.</p> <p>B. Enforce the evaluated stormwater management ordinance.</p>	Yes, enforcing the stormwater management ordinance reduces potential stormwater impacts.
<b>MCM 5 – Pollution Prevention and Good Housekeeping for Municipal Operations</b>			
5	27. Facility and Stormwater Control Inventory & Map	<p>A. Prepare and maintain an inventory of City-owned and operated facilities and stormwater controls.</p> <p>B. Prepare and maintain a map of the locations of the City-owned and operated facilities and stormwater controls.</p>	Yes, maintaining mapping for facilities and stormwater control allows staff to quickly identify potential problem areas.



Table C.2 cont'd

MCM	BMP	BMP Activity	BMP is appropriate for reducing the discharge of pollutants in stormwater (yes or no). Explain.
5	28. Facility Assessments & Inspections	<p>A. Prepare list of high priority facilities and facility assessment procedures.</p> <p>B. Perform facility assessments and document high priority facility evaluations and results. Develop periodic inspection procedures for high priority facilities.</p> <p>C. Begin periodic inspections for high priority facilities and document results.</p>	Yes, it is beneficial to identify and monitor all city owned facilities. The city has developed procedures and inspects our high priority facilities.
5	29. Standard Operating Procedures (SOPs)	<p>A. Prepare facility stormwater management SOPs and maintain a copy on site.</p> <p>B. Implement facility SOPs and update as necessary.</p>	Yes, this ensures that a stormwater operating procedure is on site at all times.
5	30. Municipal Employee Training Program	A. Continue to provide municipal employee training and maintain a training attendee list with signatures.	Yes, offering specialized training to our facility inspectors increases our staff knowledge in stormwater management.
5	31. Municipal Operation and Maintenance Activities	<p>A. Perform an assessment of municipal operations and/or activities that have the potential for pollutant discharges.</p> <p>B. Develop pollution prevention measures for municipal O&amp;M activities and select inspection frequencies.</p>	Yes, this is a good way to monitor activities that have potential for discharges.
5	32. Storm Sewer System Operation and Maintenance	<p>A. Develop O&amp;M procedures for storm drain structure maintenance and a format for recording inspections.</p> <p>B. Inspect 1/6 of the City's storm drain system structures annually and record potential problem areas.</p>	Yes, providing this service assists the City in identifying problem areas and can identify possible locations of illegal connections to the storm drain system.
5	33. Contractor Requirements and Oversight	<p>A. Develop a list of City-hired contractors subject to these stormwater program requirements.</p> <p>B. Develop contractual requirements for applicable contractor agreements and written oversight procedures.</p> <p>C. Implement the oversight procedures and execute revised contractual agreements as applicable.</p>	Yes, this will ensure that the contractor knows the stormwater program requirements prior to and during a job in the City.
5	34. Street and Parking Lot Sweeping Program	<p>A. Continue to sweep all City collector streets once per month and all arterial roads twice per month.</p> <p>B. Evaluate the existing sweeping program for O&amp;M and pollution prevention improvements and implement new standards.</p>	Yes, waste and debris are directly removed from the storm drain system every month with this contract.

3) **Pollutant Reduction Analysis:** Describe progress towards achieving the goal of reducing the discharge of pollutants to the MEP. Please Reference *Table C.3*.

*Table C.3*

MCM	BMP	Information Used	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
<b>MCM 1 – Public Education, Outreach and Involvement</b>					
1	1. Adopt-A-Waterway	Adopted waterways	123	Events	Yes. Adoptees physically entered waterways and cleaned, reducing pollutants (litter) in waterways.
			86	Miles	
1	2. Children’s Program	Youth presentations	64	Educational opportunities	No. Pollutants will be reduced over time as we educate more and more of the population.
		Youth group participation	99	Cleanups	Yes. Active cleanups reduce pollutants in waterways.
			30	youth groups	
Art contests	2	Contests	No. over time, education will provide a reduction in pollutants.		
1	3. Education and Training on Illicit Discharges	City employees	104	Employees trained	No. Over time, and through proper education of the potential threats and identifying concerns, a reduction will occur.
1	4. Household Hazardous Waste Program	HHW Brochures	160,000	Educational materials distributed	No. Overtime, education will reduce pollutants entering waterways.
		HHW Pickup	2,352	HHW pick-up requests	Yes. Picking up materials that may be disposed of improperly will reduce pollutants entering waterways.
1	5. Keep Allen Beautiful	KAB meetings	10	Board meetings held	No. Over time, proper education will reduce the amount of pollutants entering waterways.
		KAB events	4+	KAB Events	
		KAB brochures	50,000+	Printed materials distributed	
1	6. Media Coverage	New resident educational material	537	Welcome Packets	No. Education provided will hopefully account for a reduction of pollutants over time.
		Stormwater videos (ACTV)	1,400+	Total stormwater related runs	
		Social media	10+	posts	
1	7. Municipal Employee Training Program	A. Review current training program and make any necessary changes, updates, etc.	1	Review	No. Education will provide proper education and hopefully reduce pollutants over time.
		B. Conduct training for designated employees.	75	New full-time employees trained	

1	8. Pet Waste Management	B. Develop a brochure with educational information about pet waste.	1	Brochure	No. Education will allow a reduction of pollutants over time.
		C. Distribute pet waste brochure for all new adoptions.	421	Brochures distributed	
1	9. Regional Partnerships	A. Provide funding to NCTCOG to develop regional stormwater initiatives. Attend scheduled regional meetings and document City participation in regional programs.	3	Regional meetings attended	No. attending regional meetings does not provide an immediate impact. But through strategies and coordination with other municipalities and NCTCOG programs, awareness will be raised.
		B. Consider continuing the funding commitment to NCTCOG each year and document annual City participation.	1	Funding commitment renewed	
1	10. Restaurant Education	A. Research options for educational material targeting restaurants.	1	Research review in 2019	No. Educating restaurants will hopefully lead to an increase in Best Management Practices (BMP's) and reduce pollutants over time.
		B. Provide the pollution prevention education to all application restaurants in the City via website.	1	Website page provided	
1	11. Storm Drain Marking	A. Inspect 1/6 of the City's inlets each year to identify remaining inlets to be marked and/or damaged markers to be replaced.	1,896	Inlets inspected	Yes. When illicit discharges are observed, immediate action can be taken to remove the pollutant and track the source.
1	12. Stormwater Program Education	A. Distribute the City of Allen stormwater brochure and track the approximate number of brochures sent through the water bills. Also, include the brochure in a welcome package for new Allen residents.	31,947	Stormwater brochures distributed	No. proper education of residents may potentially reduce pollutants over time.
		B. Consider other educational materials, promotional giveaways, or handouts to be distributed and track the approximate number handed out.	421 31,947+	Doo the Right Thing Brochures New resident brochures/	
<b>MCM 2 – Illicit Discharge Detection and Elimination</b>					
2	13. Storm Drainage System Map	A. Annually update the storm drainage system map using record drawings submitted for any new development or redevelopment projects.	1	Storm drainage system map updated	No. Creating an inventory and map will allow quicker response and isolation of potential threats.
2	14. Education and Training on Illicit Discharges	A. Develop a list of City staff and training materials to be used for illicit discharge detection education.	1	List developed	No. Education will provide a reduction of pollutants long term.
		B. Provide training for City staff and document attendees and training materials used.	29	Staff trained	

Table C.3 cont'd

MCM	BMP	Information Used	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
2	15. Public Reporting & Response Procedures	A. Maintain public reporting/input phone number and information on the City website and in other printed materials.	1	24-hour Public reporting line	Yes. When illicit discharges are observed and reported, immediate action can be taken to remove the pollutant and track the source.
		B. Document reports received, and any corrective actions taken.	58	reports	
		C. Develop on-site procedures for responding to illicit discharges and spills.	1	Procedure developed	
2	16. Source Investigation and Elimination	A. Review current City illicit discharge ordinance and TCEQ requirements for Source investigation and Elimination requirements. Prepare ordinance changes, if necessary.	1	Review	Yes. When illicit discharges are observed, immediate action can be taken to remove the pollutant and track the source allowing for thorough cleanup and response measures.
		B. Develop written procedures for responding to illicit discharges including inspections, investigations, and corrective actions.	1	SOP developed	
		C. Implement the illicit discharge source investigation and elimination procedures. Document all reports and responses.	58	reports	
2	17. Detection and Elimination of Illicit Sanitary Sewer Discharges	A. Evaluate budget and, if feasible, perform sanitary sewer line maintenance, rehabilitations and replacement projects as needed.	6,758 ft.	Sewer pipe replaced and CCTV'd	Yes. Thorough systematic replacement of aging infrastructure, this will reduce illicit discharges.
<b>MCM 3 – Construction Site Stormwater Runoff Control</b>					
3	19. Construction Plan Review Procedures	Construction Plans	31	Reviews	No. The pollutants will be reduced over time as construction BMP's are utilized.
3	20. Construction Site Inspections and Enforcement	Construction Sites	538	Inspections	Yes. By inspecting the contractor-owned construction sites, we can evaluate if proper BMPs are in place to reduce sediment discharge and erosion.

Table C.3 cont'd

MCM	BMP	Information Used	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
3	22. Construction Stormwater Training	A. Review current training program and make any necessary changes, including employees to be trained, a training schedule, and training materials and methods.	29	Inspectors Trained	No. Over time, and through proper education of the potential threats and identifying concerns, a reduction will occur.
		B. Implement and track the training program for designated employees.			
3	23. Construction Site Inventory	A. Develop and maintain an inventory list of active regulated construction projects.	78	projects	No. maintaining an inventory of active construction will not demonstrate a direct reduction in pollutants.
<b>MCM 4 – Post-Construction Stormwater Management in New Development &amp; Redevelopment</b>					
4	24. Inspector Training	A. Provide training annually. Evaluate and update inspector materials and methods each year.	15	Inspectors Trained	No. Over time, and through proper education of the potential threats and identifying concerns, a reduction will occur.
<b>MCM 5 – Pollution Prevention and Good Housekeeping for Municipal Operations</b>					
5	27. Facility and Stormwater Control Inventory & Map	A. Prepare and maintain an inventory of City-owned and operated facilities and stormwater controls.	97	Facilities	No. Pollutant reduction will occur as we continue to maintain our facilities.
		B. Prepare and maintain a map of the locations of the City-owned and operated facilities and stormwater controls.	1	map	
5	28. Facility Assessments & Inspections	A. Prepare list of high priority facilities and facility assessment procedures.	1	List	Yes. By conducting periodic inspections, we can evaluate if proper BMPs are in place to reduce pollutants.
		B. Perform facility assessments and document high priority facility evaluations and results. Develop periodic inspection procedures for high priority facilities.	6	High Priority Facilities	
		C. Begin periodic inspections for high priority facilities and document results.	12	Periodic inspections	

Table C.3 cont'd

MCM	BMP	Information Used	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
5	29. Standard Operating Procedures (SOPs)	A. Prepare facility stormwater management SOPs and maintain a copy on site.	6	SOP's	No. Operating Procedures will ensure proper procedures are in place to prevent pollutants.
5	30. Municipal Employee Training Program	A. Continue to provide municipal employee training and maintain a training attendee list with signatures.	104	Employees trained	No. Over time, and through proper education of the potential threats and identifying concerns, a reduction will occur.
5	32. Storm Sewer System Operation and Maintenance	A. Develop O&M procedures for storm drain structure maintenance and a format for recording inspections.	1,896	Inlets inspected	Yes. When illicit discharges are observed, immediate action can be taken to remove the pollutant and track the source.
		B. Inspect 1/6 of the City's storm drain system structures annually and record potential problem areas.			
5	33. Contractor Requirements and Oversight	A. Develop a list of City-hired contractors subject to these stormwater program requirements.	1,001	Vendors	No. Agreements and oversight ensure proper BMPs are in place to reduce pollutants.
		B. Develop contractual requirements for applicable contractor agreements and written oversight procedures.			
		C. Implement the oversight procedures and execute revised contractual agreements as applicable.			
5	34. Street and Parking Lot Sweeping Program	A. Continue to sweep all City collector streets once per month and all arterial roads twice per month.	50	Sweeping Events	Yes. Operating a street sweeping program will directly eliminate potential pollutants from entering waterways.
		B. Evaluate the existing sweeping program for O&M and pollution prevention improvements and implement new standards.			

4) **Measurable Goals Status:** Provide the measurable goals for each of the MCM's, and an evaluation of the success of the implementation of the measurable goals. Please Reference *Table C.4*.

Table C.4

MCM	BMP	BMP Activity	Explain progress toward goal of how goal was achieved
<b>MCM 1 – Public Education, Outreach and Involvement</b>			
1	1. Adopt-A-Waterway	A. Continue Adopt-A-Waterway program and measure the participation and miles of waterways adopted.	Met Goal: - 123 Events - 86 Miles of waterway cleaned
1	2. Children's Program	A. Make 12 presentations per year targeting children and youth audiences. B. Promote the participation of at least 10 youth groups in community cleanup programs on an annual basis. C. Hold an art contest twice a year about environmental topics.	Met Goal: - 64 Educational opportunities with 3,755 youth - 99 Adopt-A-Program clean-ups with 30 youth groups - 224 Miles of roadway cleaned - 2 Art contests
1	3. Education and Training on Illicit Discharges	A. Develop a list of City staff and training materials to be used for illicit discharge detection education. B. Provide training for City staff and document attendees and training materials used.	Met Goal: - 104 Employees were trained on illicit discharges and training attendance tracked.
1	4. Household Hazardous Waste Program	A. Distribute HHW educational materials to the public. B. Provide curbside service in which the City will pick up hazardous waste from a resident if requested.	Met Goal: - 160,000 educational materials distributed - 2,352 requests for HHW pick-up - 26,298 Lbs. of HHW collected - 7,670 Lbs. of reusable HHW collected
1	5. Keep Allen Beautiful	A. Schedule monthly KAB Board meetings to organize cleanup events and other beautification activities. B. Hold a minimum of 4 KAB events per year. C. Track annual distribution of KAB event information.	Met Goal: - 10 board meetings held - Over 4 KAB events: The Great American Cleanup, Allen Recycles Day, Litter Index, Eggcellent Family Adventure, Allen U.S.A. and more. - Over 50,000 printed materials were distributed
1	6. Media Coverage	A. Provide two (2) media articles about the City's renewed SWMP. B. Provide each resident that opens a new water account with a welcome packet with stormwater educational material, including the Stormwater Brochure. C. Air a quarterly stormwater video or demonstration on the City cable channel. D. Assess the value of social media and track, if used.	Met Goal: - City airs quarterly stormwater videos such as "Freddy the Fish Teaches About Stormwater", "S.W. mgmt. in North Central Texas", "Storm Water to Drinking Water" and more. Over 1,400 total "runs." - Stormwater Education is being provided to all new residents. - Facebook and Twitter used for distribution of stormwater information.
1	7. Municipal Employee Training Program	A. Review current training program and make any necessary changes, updates, etc. B. Conduct training for designated employees.	Met Goal: - 75 new full-time employees trained on stormwater management program requirements.

Table C.4 cont'd

MCM	BMP	BMP Activity	Explain progress toward goal of how goal was achieved
1	8. Pet Waste Management	A. Continue enforcement of pet waste ordinance. B. Develop a brochure with educational information about pet waste. C. Distribute pet waste brochure for all new adoptions.	Met Goal: - Pet ordinances are up to date - 421 Pet brochures were distributed to stores, adoption facilities and adopters.
1	9. Regional Partnerships	A. Provide funding to NCTCOG to develop regional stormwater initiatives. Attend scheduled regional meetings and document City participation in regional programs. B. Consider continuing the funding commitment to NCTCOG each year and document annual City participation.	Met Goal: - Continue to attend regional meetings - Renewed NCTCOG partnership
1	10. Restaurant Education	A. Research options for educational material targeting restaurants. B. Provide the pollution prevention education to all application restaurants in the City via website.	Met Goal: - Allen Distributes flyers to educate restaurants on FOG - Staff keeps record of all inspections of restaurants - Education is provided via our website.
1	11. Storm Drain Marking	A. Inspect 1/6 of the City's inlets each year to identify remaining inlets to be marked and/or damaged markers to be replaced.	Met Goal: - Inspected 1,896 of 9,794 storm drain structures.
1	12. Stormwater Program Education	A. Distribute the City of Allen stormwater brochure and track the approximate number of brochures sent through the water bills. Also, include the brochure in a welcome package for new Allen residents. B. Consider other educational materials, promotional giveaways, or handouts to be distributed and track the approximate number handed out.	Met Goal: - 31,947 Stormwater brochures were distributed in water bills - 537 brochures were distributed to new residents - An additional "2019 Water Quality Report" brochure was sent to all residents (31,947) in water bills
<b>MCM 2 – Illicit Discharge Detection and Elimination</b>			
2	13. Storm Drainage System Map	A. Annually update the storm drainage system map using record drawings submitted for any new development or redevelopment projects.	Met Goal: - The storm drainage map is continuously updated as projects and developments are completed.
2	14. Education and Training on Illicit Discharges	A. Develop a list of City staff and training materials to be used for illicit discharge detection education. B. Provide training for City staff and document attendees and training materials used.	Met Goal: - 29 Staff were trained in their field of expertise.



Table C.4 cont'd

MCM	BMP	BMP Activity	Explain progress toward goal of how goal was achieved
2	15. Public Reporting & Response Procedures	A. Maintain public reporting/input phone number and information on the City website and in other printed materials. B. Document reports received, and any corrective actions taken. C. Develop on-site procedures for responding to illicit discharges and spills.	Met Goal: - 24-hr reporting hotline is available - Database and work order programs track reports and actions taken - 58 reports received and action taken
2	16. Source Investigation and Elimination	A. Review current City illicit discharge ordinance and TCEQ requirements for Source investigation and Elimination requirements. Prepare ordinance changes, if necessary. B. Develop written procedures for responding to illicit discharges including inspections, investigations, and corrective actions. C. Implement the illicit discharge source investigation and elimination procedures. Document all reports and responses.	Met Goal: - Ordinance reviewed and revised based on the January 2019 TCEQ MS4 Phase II permit. Ordinance adopted at the 12.10.2019 Council meeting. - Written procedures were developed in our SOP's - Implemented and documented our IDDE response
2	17. Detection and Elimination of Illicit Sanitary Sewer Discharges	A. Evaluate budget and, if feasible, perform sanitary sewer line maintenance, rehabilitations and replacement projects as needed. B. Track locations and/or design of completed projects if the budget allows.	Met Goal: - 391,259 Feet of Pipe Cleaned - 290,882 Feet of Pipe TV'd - 6,758 Feet of pipe replaced and CCTV
<b>MCM 3 – Construction Site Stormwater Runoff Control</b>			
3	18. Erosion & Sediment Control Requirements	A. Review and amend, if necessary, the current City stormwater management ordinance for compliance with the renewed TCEQ permit. B. Adopt and enforce the stormwater management ordinance.	Met Goal: - Ordinance reviewed and revised based on the January 2019 TCEQ MS4 Phase II permit. Ordinance adopted at the 12.10.2019 Council meeting.
3	19. Construction Plan Review Procedures	A. Review and amend, if necessary, existing erosion control plan review procedures for compliance with the renewed TCEQ permit and the City's Stormwater Management Ordinance. B. Administer the review process for all new regulated construction projects.	Met Goal: - The City administers an Erosion Control Plan Review for all new regulated construction projects which is in compliance with the TCEQ permit.
3	20. Construction Site Inspections and Enforcement	A. Review and amend, if necessary, the existing inspection procedures for erosion and sediment controls in compliance with the renewed TCEQ permit. B. Administer the inspection and enforcement program and document construction site inspections performed and any follow-up actions.	Met Goal: - The erosion and sediment control inspection procedures are current with the TCEQ permit. - Currently tracking inspection and enforcement and providing follow-up.

Table C.4 cont'd

MCM	BMP	BMP Activity	Explain progress toward goal of how goal was achieved
3	21. Construction Site Stormwater Education	A. Provide the construction site erosion control education guideline to contractors and homebuilders at preconstruction meetings or with the building permit and make the brochure available at the City permitting office.	Met Goal: - Site Waste Consent Form is signed by all contractors prior to all construction. - The NCTCOG "Preventing Stormwater Pollution at Construction Sites" pamphlet is given to all contractors at preconstruction meetings.
3	22. Construction Stormwater Training	A. Review current training program and make any necessary changes, including employees to be trained, a training schedule, and training materials and methods. B. Implement and track the training program for designated employees.	Met Goal: - 29 Staff were trained this year. - The City tracks the employee training program by requiring signature and date once completed.
3	23. Construction Site Inventory	A. Develop and maintain an inventory list of active regulated construction projects.	Met Goal: - The City maintains an inventory list of active regulated construction projects.
<b>MCM 4 – Post-Construction Stormwater Management in New Development &amp; Redevelopment</b>			
4	24. Inspector Training	A. Provide training annually. Evaluate and update inspector materials and methods each year.	Met Goal: - 15 staff were trained this year.
4	25. Long-Term Maintenance of Post-Construction BMPs	A. Develop requirements for the long-term operation and maintenance of structural controls installed on development sites. B. Implement the post-construction maintenance program.	Met Goal: - continued to implement the post-construction maintenance program. .
4	26. Post-Construction Ordinance	A. Review existing stormwater management ordinance and adopt any necessary changes. B. Enforce the evaluated stormwater management ordinance.	Met Goal: - Ordinance revised 12.10.2019 to ensure compliance with MS4 permit issued on January 24, 2019.. - Ordinance is enforced.
<b>MCM 5 – Pollution Prevention and Good Housekeeping for Municipal Operations</b>			
5	27. Facility and Stormwater Control Inventory & Map	A. Prepare and maintain an inventory of City-owned and operated facilities and stormwater controls. B. Prepare and maintain a map of the locations of the City-owned and operated facilities and stormwater controls.	Met Goal: - Maintained and updated a spreadsheet of City owned facilities. - Maintained and updated a map of City owned facilities.
5	28. Facility Assessments & Inspections	A. Prepare list of high priority facilities and facility assessment procedures. B. Perform facility assessments and document high priority facility evaluations and results. Develop periodic inspection procedures for high priority facilities. C. Begin periodic inspections for high priority facilities and document results.	Met Goal: - Maintain a spreadsheet of City owned facilities that identifies High Priority facilities. - Performed assessments of City owned facilities. - conducted periodic inspections of high priority facilities and documented results.

Table C.4 cont'd

MCM	BMP	BMP Activity	Explain progress toward goal of how goal was achieved
5	29. Standard Operating Procedures (SOPs)	<p>A. Prepare facility stormwater management SOPs and maintain a copy on site.</p> <p>B. Implement facility SOPs and update as necessary.</p>	<p>Met Goal:</p> <ul style="list-style-type: none"> <li>- SOP's created and stored at High Priority Facilities with an electronic file available on the City Website.</li> <li>- Implemented facility SOP's.</li> </ul>
5	30. Municipal Employee Training Program	<p>A. Continue to provide municipal employee training and maintain a training attendee list with signatures.</p>	<p>Met Goal:</p> <ul style="list-style-type: none"> <li>- 104 municipal employees trained, combined.</li> </ul>
5	31. Municipal Operation and Maintenance Activities	<p>A. Perform an assessment of municipal operations and/or activities that have the potential for pollutant discharges.</p> <p>B. Develop pollution prevention measures for municipal O&amp;M activities and select inspection frequencies.</p>	<p>Met Goal:</p> <ul style="list-style-type: none"> <li>- Developed the SOP's, O&amp;M activities, City Facilities list/assessments, and High Priority List.</li> <li>- High Priority Inspections are conducted 2 times per year.</li> </ul>
5	32. Storm Sewer System Operation and Maintenance	<p>A. Develop O&amp;M procedures for storm drain structure maintenance and a format for recording inspections.</p> <p>B. Inspect 1/6 of the City's storm drain system structures annually and record potential problem areas.</p>	<p>Met Goal:</p> <ul style="list-style-type: none"> <li>- 1,896 of 9,794 inlets/outfalls were inspected.</li> </ul>
5	33. Contractor Requirements and Oversight	<p>A. Develop a list of City-hired contractors subject to these stormwater program requirements.</p> <p>B. Develop contractual requirements for applicable contractor agreements and written oversight procedures.</p> <p>C. Implement the oversight procedures and execute revised contractual agreements as applicable.</p>	<p>Met Goal:</p> <ul style="list-style-type: none"> <li>-The City tracks and updates a list of City-hired Contractors.</li> <li>- Implemented procedures and executed revised contractual agreements, as applicable.</li> </ul>
5	34. Street and Parking Lot Sweeping Program	<p>A. Continue to sweep all City collector streets once per month and all arterial roads twice per month.</p> <p>B. Evaluate the existing sweeping program for O&amp;M and pollution prevention improvements and implement new standards.</p>	<p>Met Goal:</p> <ul style="list-style-type: none"> <li>- The City has records of all streets swept each month—approximately 380 road miles in a month.</li> <li>- The City continued to implement our SOP for street sweeping.</li> </ul>

## 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.?

- 1) The MS4 has conducted monitoring of stormwater quality and submitted in the annual report.

Yes  No

- a) Explain below or attach a summary to submit along with any monitoring data used to evaluate the success of the SWMP at reducing pollutants to the maximum extent practicable. Be sure to include a discussion of results.

*The City of Allen has performed routine maintenance and cleaning of portions of the MS4 as noted in the annual report, however no monitoring data was collected and analyzed.*

The City of Allen institutes visual inspections performed throughout the permit year to evaluate the effectiveness of the stormwater program. These inspections document any structural damage to the existing system, any witnessed uncommon discharges to local water bodies and the presence or absence of any stormwater inlet markers. Discharges detected as having unusual color, clarity, or odor are placed in a universal GIS database and forwarded to the appropriate department for corrective action and cleanup.

Construction inspections are additionally performed to ensure that pollutants are not migrating to local waterways. These inspections are typically completed by City inspection staff every month. It is understood by the development community at preconstruction and field meetings that these inspections do not replace permit requirements outlined in the Construction General Permit but are used as a secondary safeguard by the City in an attempt to anticipate erosion issues for individual development sites.

The City of Allen also performs monthly sweeping of arterial roadways, major intersections, City owned parking lots and some collector streets in order to directly remove pollutants from the stormwater system. It is estimated that approximately 380 miles of roadway are swept each month.

Several aspects of the program emphasize educating the public as well as educating municipal employees on correct pollution prevention techniques. Instruction is given to City of Allen inspection staff and new employees to identify areas of stormwater pollution and either correct or report any issues.

The City continues to track the distribution of stormwater materials in our SWMP. The City continues to track individual employee training with separate PowerPoints related to stormwater in areas that match their daily activities. The City has implemented our Standard Operating Procedures and is conducting periodic inspections of our High Priority Facilities. With the development of our SOP's, we created BMP's for staff and contractual obligations for vendors to follow that work with the City of Allen.

## D. Impaired Waterbodies and Total Maximum Daily Loads

1. Identify whether an impaired water within the permitted area was added to the latest EPA-approved 303(d) list or the Texas Integrated Report of Surface Water Quality for CWA Sections 305(b) and 303(d). List any newly-identified impaired waters below by including the name of the water body and the cause of impairment.
  - 1) *After reviewing the latest EPA-approved 303(d) list, Texas Integrated Report of Surface Water Quality for CWA Sections 305(b) and 303(d), a determination that no receiving water body is within the permitted area (City of Allen limits)*

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

2)

*Not Applicable. No impaired waterbodies were identified within City of Allen limits on the latest Clean Water Act 303(d) list or the most recently approved Texas Integrated Report Index of Water Quality Impairments, or the Texas Integrated Report of Surface Water Quality for CWA sections 305(b) and 303(d)*

- 3) Describe the implementation of targeted controls if the small MS4 discharges to an impaired waterbody with an approved TMDL.

*Not Applicable.*

- 4) Report the benchmark identified by the MS4 and assessment activities (Part II Section D.4.(a):

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

- 5) Provide and analysis of how the selected BMPs will be effective in contributing to achieving the benchmark:

Benchmark Parameter	Selected BMP	Contribution to achieving Benchmark
N/A	N/A	N/A

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

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

7) Assess the progress to determine BMP's effectiveness in achieving the benchmark.  
 For example, the MS4 may use the following indicators:

- Number of sources identified or eliminated;
- Number of illegal dumpings;
- Increase in illegal dumping reported;
- Number of educational opportunities conducted;
- Reductions in sanitary sewer flows (SSOs); or,
- Increase in illegal discharge detection through dry screening.

Benchmark Indicator	Description/Comments
N/A	N/A

**E. Stormwater Activities(Part IV Section B.2 (d))**

Describe activities planned for the next reporting year:

The City has not received an approved Stormwater Management Plan (SWMP) from the TCEQ at the time this annual report was completed. Therefore, we will continue using our Term II SWMP that was previously approved by TCEQ. A list of continued MCM's are below (Table F.1):

Table F.1

MCM	BMP	Stormwater Activity	Describe / Comments
<b>MCM 1 – Public Education, Outreach and Involvement</b>			
1	1. Adopt-A-Waterway	A. Continue Adopt-A-Waterway program and measure the participation and miles of waterways adopted.	This Program educates the community about pollution impacts of natural waterways and allows opportunities for the public to participate in cleaning up trash, debris, and other pollutants from area streams and creeks.
1	2. Children’s Program	<p>A. Make 12 presentations per year targeting children and youth audiences.</p> <p>B. Promote the participation of at least 10 youth groups in community cleanup programs on an annual basis.</p> <p>C. Hold an art contest twice a year about environmental topics.</p>	Develop and execute programs that specifically target children and youth about stormwater awareness and cleanup efforts.
1	3. Education and Training on Illicit Discharges	<p>A. Develop a list of City staff and training materials to be used for illicit discharge detection education.</p> <p>B. Provide training for City staff and document attendees and training materials used.</p>	Provide educational information and training relevant to City staff including field personnel who may come into contact with or observe an illicit discharge or illicit connection.
1	4. Household Hazardous Waste Program	<p>A. Distribute HHW educational materials to the public.</p> <p>B. Provide curbside service in which the City will pick up hazardous waste from a resident if requested.</p>	A program to provide a location for residents to properly dispose of HHW and to develop public education about the program and improper disposal of HHW.
1	5. Keep Allen Beautiful	<p>A. Schedule monthly KAB Board meetings to organize cleanup events and other beautification activities.</p> <p>B. Hold a minimum of 4 KAB events per year.</p> <p>C. Track annual distribution of KAB event information.</p>	Keep Allen Beautiful is an affiliate of Keep Texas and Keep America Beautiful and has a board composed of 7 citizens that meet monthly to develop and organize public education and involvement programs throughout the community.
1	6. Media Coverage	<p>A. Provide two (2) media articles about the City's renewed SWMP.</p> <p>B. Provide each resident that opens a new water account with a welcome packet with stormwater educational material, including the Stormwater Brochure.</p> <p>C. Air a quarterly stormwater video or demonstration on the City cable channel.</p> <p>D. Assess the value of social media and track, if used.</p>	Provide Media coverage of the City's SWMP development, request public involvement in the program and educate the public about volunteer opportunities in Keep Allen Beautiful programs.
1	7. Municipal Employee Training Program	<p>A. Review current training program and make any necessary changes, updates, etc.</p> <p>B. Conduct training for designated employees.</p>	The City understands the importance to educate all new employees hired by the City of Allen about the City's SWMP and continue providing this training.

Table F.1 cont'd

MCM	BMP	Stormwater Activity	Describe / Comments
1	8. Pet Waste Management	A. Continue enforcement of pet waste ordinance. B. Develop a brochure with educational information about pet waste. C. Distribute pet waste brochure for all new adoptions.	A combination of educational outreach and enforcement procedures to encourage residents to clean up after their pets.
1	9. Regional Partnerships	A. Provide funding to NCTCOG to develop regional stormwater initiatives. Attend scheduled regional meetings and document City participation in regional programs. B. Consider continuing the funding commitment to NCTCOG each year and document annual City participation.	Partnership with regional cities and DOT's through the North Central Texas Council of Governments to develop cooperative public education and involvement programs addressing stormwater quality.
1	10. Restaurant Education	A. Research options for educational material targeting restaurants. B. Provide the pollution prevention education to all application restaurants in the City via website.	Restaurants can have a major impact on water quality if not properly addressed. By providing accessible education it helps pollution prevention.
1	11. Storm Drain Marking	A. Inspect 1/6 of the City's inlets each year to identify remaining inlets to be marked and/or damaged markers to be replaced.	Provide opportunities for volunteers and staff to place polyvinyl stickers on storm drain inlets that warn the public not to dump pollutants into the inlet. Educate residents about volunteer opportunities.
1	12. Stormwater Program Education	A. Distribute the City of Allen stormwater brochure and track the approximate number of brochures sent through the water bills. Also, include the brochure in a welcome package for new Allen residents. B. Consider other educational materials, promotional giveaways, or handouts to be distributed and track the approximate number handed out.	The City will explore other opportunities to provide general stormwater education to residents.
<b>MCM 2 – Illicit Discharge Detection and Elimination</b>			
2	13. Storm Drainage System Map	A. Annually update the storm drainage system map using record drawings submitted for any new development or redevelopment projects.	Maintain an up-to-date storm drainage system map that includes identifying locations of storm drainage conveyances, all major outfalls and the names and locations of receiving waters.
2	14. Education and Training on Illicit Discharges	A. Develop a list of City staff and training materials to be used for illicit discharge detection education. B. Provide training for City staff and document attendees and training materials used.	The City will continue to provide education opportunities for field staff that meets our current/future SWMP and document attendees.



Table F.1 cont'd

MCM	BMP	Stormwater Activity	Describe / Comments
2	15. Public Reporting & Response Procedures	<p>A. Maintain public reporting/input phone number and information on the City website and in other printed materials.</p> <p>B. Document reports received, and any corrective actions taken.</p> <p>C. Develop on-site procedures for responding to illicit discharges and spills.</p>	Provide a public input mechanism for receipt and consideration of information submitted by the public concerning construction site stormwater runoff, illicit discharges or illegal dumping.
2	16. Source Investigation and Elimination	<p>A. Review current City illicit discharge ordinance and TCEQ requirements for Source investigation and Elimination requirements. Prepare ordinance changes, if necessary.</p> <p>B. Develop written procedures for responding to illicit discharges including inspections, investigations, and corrective actions.</p> <p>C. Implement the illicit discharge source investigation and elimination procedures. Document all reports and responses.</p>	Provide the Standard Operating Procedures to all departments that outlines the procedures to handle potential illicit discharges, safe cleanup, and documentation.
2	17. Detection and Elimination of Illicit Sanitary Sewer Discharges	<p>A. Evaluate budget and, if feasible, perform sanitary sewer line maintenance, rehabilitations and replacement projects as needed.</p> <p>B. Track locations and/or design of completed projects if the budget allows.</p>	A program to eliminate illicit discharges resulting from sanitary sewer system overflows. Perform sanitary sewer maintenance, replacement and/or rehabilitation projects to significantly reduce and/or eliminate sanitary sewer overflow potential.
<b>MCM 3 – Construction Site Stormwater Runoff Control</b>			
3	18. Erosion & Sediment Control Requirements	<p>A. Review and amend, if necessary, the current City stormwater management ordinance for compliance with the renewed TCEQ permit.</p> <p>B. Adopt and enforce the stormwater management ordinance.</p>	Continue to review and amend, if necessary, erosion and sediment control requirements for regulated construction activities. Maintain a list of prohibited discharges from construction activities to be included and enforced in the ordinance, if needed.
3	19. Construction Plan Review Procedures	<p>A. Review and amend, if necessary, existing erosion control plan review procedures for compliance with the renewed TCEQ permit and the City's stormwater management ordinance.</p> <p>B. Administer the review process for all new regulated construction projects.</p>	The City developed a plan review checklist that is completed at the 60% to 90% plan level and stored in the project files. Staff will continue to complete this checklist for all projects.
3	20. Construction Site Inspections and Enforcement	<p>A. Review and amend, if necessary, the existing inspection procedures for erosion and sediment controls in compliance with the renewed TCEQ permit.</p> <p>B. Administer the inspection and enforcement program and document construction site inspections performed and any follow-up actions.</p>	Continue to investigate improvements to the construction site inspection/enforcement procedures to ensure the proper installation and maintenance of erosion/sediment controls on all construction sites.

Table F.1 cont'd

MCM	BMP	Stormwater Activity	Describe / Comments
3	21. Construction Site Stormwater Education	A. Provide the construction site erosion control education guideline to contractors and homebuilders at preconstruction meetings or with the building permit and make the brochure available at the City permitting office.	Providing useful information on erosion control education to contractors and homebuilders. The brochure is available at Allen City Hall.
3	22. Construction Stormwater Training	A. Review current training program and make any necessary changes, including employees to be trained, a training schedule, and training materials and methods. B. Implement and track the training program for designated employees.	The City will continue to provide education opportunities for field staff that meets the requirements of our current/future SWMP and document attendees.
3	23. Construction Site Inventory	A. Develop and maintain an inventory list of active regulated construction projects.	Develop and maintain an inventory of all permitted and active public and private construction sites within the City.
<b>MCM 4 – Post-Construction Stormwater Management in New Development &amp; Redevelopment</b>			
4	24. Inspector Training	A. Provide training annually. Evaluate and update inspector materials and methods each year.	The City will continue to provide education opportunities for field staff that meets our current/future SWMP and document attendees.
4	25. Long-Term Maintenance of Post-Construction BMPs	A. Develop requirements for the long-term operation and maintenance of structural controls installed on development sites. B. Implement the post-construction maintenance program.	The City will continue to review the existing long-term maintenance requirements of the stormwater management ordinance and SOP's. SOP's will continue to be implemented.
4	26. Post-Construction Ordinance	A. Review existing stormwater management ordinance and adopt any necessary changes. B. Enforce the evaluated stormwater management ordinance.	The City will continue to enforce our stormwater management ordinance.
<b>MCM 5 – Pollution Prevention and Good Housekeeping for Municipal Operations</b>			
5	27. Facility and Stormwater Control Inventory & Map	A. Prepare and maintain an inventory of City-owned and operated facilities and stormwater controls. B. Prepare and maintain a map of the locations of the City-owned and operated facilities and stormwater controls.	The City will maintain our list of facilities to include a location map contained within our SOP. Once every 4 years we will assess each facility for potential pollutants of concern.
5	28. Facility Assessments & Inspections	A. Prepare list of high priority facilities and facility assessment procedures. B. Perform facility assessments and document high priority facility evaluations and results. Develop periodic inspection procedures for high priority facilities. C. Begin periodic inspections for high priority facilities and document results.	The City has developed our high priority facilities through our site assessments. Each high priority facility will be inspected a minimum of 2 times a year in accordance with our SOPs.

Table F.1 cont'd

MCM	BMP	Stormwater Activity	Describe / Comments
5	29. Standard Operating Procedures (SOPs)	A. Prepare facility stormwater management SOPs and maintain a copy on site. B. Implement facility SOPs and update as necessary.	The City will maintain the SOPs updating them with any changes required with any new permit requirements.
5	30. Municipal Employee Training Program	A. Continue to provide municipal employee training and maintain a training attendee list with signatures.	The City will continue to provide education opportunities for field staff that meets the requirements of our current/future SWMP and document attendees.
5	31. Municipal Operation and Maintenance Activities	A. Perform an assessment of municipal operations and/or activities that have the potential for pollutant discharges. B. Develop pollution prevention measures for municipal O&M activities and select inspection frequencies.	The City will maintain our list of facilities and include a location map contained within our SOP. Once every 4 years we will assess each facility for potential pollutants of concern. The City will maintain the SOPs updating them with any changes required with any new permit requirements.
5	32. Storm Sewer System Operation and Maintenance	A. Develop O&M procedures for storm drain structure maintenance and a format for recording inspections. B. Inspect 1/6 of the City's storm drain system structures annually and record potential problem areas.	Continue to implement a storm drain system O&M program to reduce or eliminate the collection of pollutants in the storm drain system.
5	33. Contractor Requirements and Oversight	A. Develop a list of City-hired contractors subject to these stormwater program requirements. B. Develop contractual requirements for applicable contractor agreements and written oversight procedures. C. Implement the oversight procedures and execute revised contractual agreements as applicable.	City provides verbiage within all our contract documents requiring them to follow the current SOP manual.
5	34. Street and Parking Lot Sweeping Program	A. Continue to sweep all City collector streets once per month and all arterial roads twice per month. B. Evaluate the existing sweeping program for O&M and pollution prevention improvements and implement new standards.	Continue to perform regular street sweeping of public streets and municipal parking lots to prevent trash, dust, silt and sediment from entering the storm drain system.

1) F. SWMP Modifications (Part III.A.2 and Part IV SECTION B.2 (e)) The SWMP and MCM implementation procedures are reviewed each year.

Yes       No

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

Yes       No

*Not applicable.*

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

MCM(s)	Measurable Goal(s) or BMP(s)	Implemented or Proposed Changes (Submit NOC as needed)

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

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

*Not applicable.*

## F. Additional BMP's for TMDLs and I-Plans

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

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

## G. Additional Information (Part IV SECTION B.2 (g))

- 1) Is the permittee relying on another entity/ies to satisfy some of its permit obligations?

Yes  No

If "Yes", provide the name(s) of other entity/ies and an explanation of their responsibilities:

Name and Explanation: *Not applicable.*

- 2) Is the named permittee sharing a SWMP with other entities?

Yes  No

- 3) If "Yes", is this a system-wide annual report including information for all permittees?

Yes  No (*Not applicable*)

If "Yes", list all associated permit numbers and permittee names (add additional spaces or pages if needed):

Authorization Number: N/A Permittee: N/A

## H. Construction Activities (Part IV SECTION B.2 (h-i))

- 1) The number of construction activities that occurred in the jurisdictional area of the MS4 (Large and Small Site Notices submitted by construction site operators): 78

- 2) Does the permittee utilize the optional seventh MCM related to the construction?

Yes  No

- 3) If "yes," then provide the following information for this permit year:

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

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

## I. 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): Eric Ellwanger Title: City Manager

Signature:  Date: 3/5/2020

Name of MS4: City of Allen

**Note:** If this is a system-wide annual report including information for all permittees, each permittee shall sign and certify the annual report in accordance with 30 TAC d305.128 (relating to Signatories and Reports).

## J. APPENDIX I

Additional information is available upon request.