



April 13, 2020

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

Re: Phase II MS4 Annual Report Transmittal for Brushy Creek Municipal
Utility District
TPDES Authorization: TXR040049

Dear Team Leader:

This letter serves to transmit the required annual report for the Texas Pollutant Discharge Elimination System Small Municipal Separate Storm Sewer System General Permit, Authorization Number TXR040049 for Brushy Creek Municipal Utility District.

The annual report is for Year 1. The reporting period's beginning January 24, 2019 and ending January 23, 2020.

A separate Notice of Change has not been submitted based on the fact that changes have not been proposed for the next permit year.

As required by the general permit, a copy of the report has been mailed to the TCEQ's regional office 11 in Austin, Texas.

Sincerely,

A handwritten signature in black ink, appearing to read "Joey Miller", is written over the word "Sincerely,".

Joey Miller



Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number TXR040000

A. General Information

Authorization Number: TXR040049

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

Annual Reporting Year Option Selected by MS4:

Calendar Year: _____

Permit Year: X

Fiscal Year: _____ Last day of fiscal year: (_____)

Reporting period beginning date: January 24, 2019

Reporting period end date: January 23, 2020

MS4 Operator Level: 2 Name of MS4: Brushy Creek Municipal Utility District

Contact Name: Joey Miller Telephone Number: (512)255-7871 x.408

Mailing Address: 16318 Great Oaks Drive, Round Rock Tx. 78681

E-mail Address: j.miller@bcmud.org

A copy of the annual report was submitted to the TCEQ Region: YES X NO

Region the annual report was submitted to: TCEQ Region 11

B. Status of Compliance with the MS4 GP and SWMP

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

	Yes	No	Explain
Permittee is currently in compliance with the SWMP as submitted to and approved by the TCEQ.	X		
Permittee is currently in compliance with recordkeeping and reporting requirements.	X		

Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.).	X		
Permittee conducted an annual review of its SWMP in conjunction with preparation of the annual report	X		

2. Provide a general assessment of the appropriateness of the selected BMPs. You may use the table below to meet this requirement (**see Example 1 in instructions**):

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
1: Public Education	1.1 Stormwater Website 1.2 Flyers, Brochures 1.3 Newsletter 1.4 Environmentally Friendly Gardening Classroom training 1.5 UIAC Committee 1.6 Stream Clean up	This BMP is not quantifiable, but it does give the residents information on different avenues to use to reduce the discharge of pollutants through our District stormwater website, handouts, newsletters, and classes. There are several public involvement activities in the District. Monthly gardening classes that teach the use of organics and proper gardening techniques. The Utility Infrastructure Advisory Committee (UIAC), comprised of Board appointed residents, provides guidance on all matters related to infrastructure including stormwater management activities. Finally, Keep Brushy Creek Beautiful program has periodic community cleanups which are held along Brushy Creek.

2: Illicit Discharge Detection and Elimination	Continuation of a program to identify and schedule the elimination of sanitary sewer leaks and/or illicit connections to the MS4 through the current activities required by the Edwards Aquifer Program	<p>The District films 20% of its sanitary sewer line on an annual basis. This video is then reviewed by an engineer. This reviewing process determines if there are issues within the filmed system that need to be addressed. These issues are addressed through repair, cleaning of lines, and/ or refilming. Repairs are refilmed and given to the engineer to certify. The engineer issues a letter of certification to indicate that the system has been filmed and all issues were addressed and corrected.</p> <p>Proactive steps continue to be underway to manage the District's assets through an assessment by an engineering firm of all water sewer, and stormwater infrastructure and a review of current maintenance practices. This will ensure that timely investments are made, and catastrophic issues avoided.</p> <p>Finally, residents are provided a phone number to report spills or illicit discharges. Processes are in place for follow-up.</p>
3: Construction Site Storm Water Runoff Control	<p>3.2 Construction Plan Review</p> <p>3.3 Construction Site Inspection</p>	<p>Yes, construction site run off control ensures that loose sediment, trash, and debris do not make their way into the receiving stream.</p> <p>All new construction plans were reviewed by an outside engineering firm, the District's plumbing inspector, and staff to ensure the use of best practices and compliance with local ordinances.</p> <p>Staff also performs weekly erosion control inspection on all ongoing construction projects.</p>
4: Post Construction Stormwater Management	4.3 Project Inspections	<p>Yes, post project inspections ensure that there are not any issues that come after construction is over. Special attention is given to stormwater system impacted by newly constructed impervious surfaces. Also, District staff make the "rounds" of the District during heavy rain events. Storm water ponds are inspected on a weekly basis and if necessary appropriate maintenance measure taken.</p>

<p>5: Pollution Prevention and Good Housekeeping</p>	<p>5.1 District owned facilities 5.2 Employee Education 5.4 Vehicle Maintenance 5.5 Landscaping 5.6 Pesticide Application 5.7 Pet Waste Management 5.8 Water conservation</p>	<p>Yes, these BMPs assist in the discharge of pollutants both directly and indirectly.</p> <p>The District currently has a fulltime building maintenance employee on staff. This employee ensures that District facilities are kept in pristine condition Both wet and dry ponds are inspected weekly and maintained on a regular basis and storm inlets, storm outfalls, and autofill lines are cleaned as needed. Also, staff receives relevant training and standard operating procedures are in place for maintenance of the stormwater system.</p> <p>The District makes available to staff educational programs for the purpose of training employees on stormwater quality issues and measures that they can take to prevent pollutants from entering the District-owned facilities.</p> <p>Vehicles are inspected on a regular basis. Written logs are kept on each vehicle and piece of equipment. The District has policy of retiring a vehicle when it reached 7 years of age or has 120,000 miles recorded.</p> <p>Landscaping is performed by the Parks Department and outside contractors. Environmentally safe steps are used. Contractors fertilize flower beds twice a year and trees four times a year</p> <p>All pesticides that are used by staff and contractors are organic. A detailed record is kept of each application. The District has one employee that has a pesticide license.</p> <p>The Parks Dept. maintains pet waste sites throughout the District's park land. These sites are checked on a weekly basis. The ones that see more use are checked more frequently.</p> <p>The District has adopted and follows a water conservation and drought contingency plan. This information is made available to our residents on the District's website. District utility staff have worked very hard and succeeded to achieve an annual unaccounted for water under 10%. A significant improvement from a high of over 25% seven years ago.</p>
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3. Describe progress towards achieving the goal of reducing the discharge of pollutants to the MEP. If no progress was made or the BMP did not result in a reduction in pollutants, provide an explanation. Use the table below to meet this requirement (**see Example 2 in instructions**):

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
1.0 Public Education	1.1 Website and 1.3 Newsletter	Website includes relevant information including the Stormwater Management Plan. The articles in the newsletter relate to water conservation, fats, oils and greases, stormwater collection, gardening tips.	The District publishes a monthly newsletter that is distributed by email and also USPS mail.	24 per year	No, these activities do not provide a direct quantifiable result. Although public education will have a preventive effect, build capacity in our community, and demonstrate continuous results that will benefit the future.
1.0 Public Education	1.4 Classroom Training: Environmental Gardening	Each month a different topic on organic gardening is talked about plus two extra for garden days.	2 hours	month	Average 14 attendees monthly. There were two additional classes held: one in the spring and one in the fall. These two classes averaged 20 people.

1.0 Public Education	1.5 UIAC	Quarterly meetings are held with this advisory Board to review all of the Districts infrastructure assets	2 hours	quarterly	Average 8 attendees per meeting. Relevant Topics covered include the sewer system, unaccounted for water, and Asset Management Plan
1.0 Public Education	1.6 Stream Clean Up	This program uses District staff and volunteers to help keep Brushy Creek clean.	2	events	Yes, the District hosts two creek clean up events each year. There were approximately 56 individuals total present at the events and 264 pounds of trash was picked up. There was also 165 pounds of recycling collected.
2.0 Illicit Discharge	Sanitary Sewer Leak Elimination	Process of cleaning, filming 20% of the District's sewer system on an annual basis. Repairs are made on any issues found	70,000	feet	Yes, in 2019 there was 70,000 feet of sewer line cleaned and inspected. This film was reviewed by an engineer to certify the structural integrity of the collection system. There were 18 issues noted. Three issues are needing repair. The remainder of the issues were extra cleaning and monitoring of the line. None of the issues resulted in any exfiltration of wastewater. District staff has one year to correct any of the issues that were noted. These repairs are then refilmed and recertified by the District's engineer.
2.0 Illicit Discharge	Public Reporting of Illicit Discharges or Spills	Reports from residents of possible illicit spills	1	Call in	No, the incident was investigated but did not find any wrongdoing.

3.0 Construction Site Stormwater Runoff Control	Construction Plan Review	The District is over 98% built out. There are a minimal number of commercial lots left to develop.	2	Plot plans and construction plans	No, does not show quantifiable reduction. Four plan reviews were conducted to ensure that proper erosion control was part of the construction plans. This gives the necessary information to District staff to perform weekly inspections.
3.0 Construction Site Stormwater Runoff Control	Construction Site Inspections	Inspection of construction sites to ensure proper erosion control is being used.	Various times throughout the year	Inspections	Yes, these inspections help reduce the amount of debris leaving the construction sites.
4.0 Post Construction	Project Inspections	Inspection and maintenance of wet ponds, dry ponds, storm inlets, and storm outfalls.	11 wet ponds and 13 dry ponds inspected and maintained.		Yes, ponds are inspected and maintained monthly. This removes debris from the ponds, ensures that the vegetation is correct, and that the ponds are not leaking. Inlet and outfall cleaning reduce the chance of unwanted organics and inorganics entering the wet ponds and possibly the water ways.

5.0	5.2 Employee Education.	Training on storm water, wastewater, environmental topics	5	Classes Hours varied per class.	District staff attended various classes throughout the year. Classes attended were: Wastewater Collection (2 attendees) TCEQ stormwater conference (1) Irrigation (3) Tree conference (3) Pesticide Application (1)
5.0 Pollution Prevention	5.7 Pet Waste Management	5.7 Maintenance of receptacles and removal of animal waste from receptacles.	39	stations	Yes, the District has numerous pet waste stations to assist residents and visitors with the removal of pet waste in these areas. These stations are checked on a weekly basis. Over 200 gallons of waste was disposed of over the course of the year.

4. Provide the measurable goals for each of the MCMs, and an evaluation of the success of the implementation of the measurable goals (**see Example 3 in instructions**):

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
1	Maintain a record of the number of times newsletters are posted	Met Goal - Newsletters went out monthly. They were distributed through mail outs and email.
1	Annually report the number of times these announcements are posted	Met Goal – These numbers are reported in the District’s annual MS4 report.
2	Sanitary Sewer Leak Elimination	Met Goal – 20% of the sewer system was inspected and cleaned.
3	Plan review procedures	Met Goal – Initial plan review is performed by an outside engineer. During the construction phase, District reviews plans to ensure that the erosion control that is specified in the plans is being followed. Also, that erosion control that is specified in the plot plans is in place before breaking of ground begins. The plans are also reviewed by a licensed plumbing inspector to ensure that the design meets the Uniform Plumbing Code.
3	Construction Site Inspections	Met Goal - Staff performed site inspections.
4	Plan review procedures	Met Goal – There were not any changes to the plan review process. Acceptable erosion control methods and goals were met.
5	Identify and evaluate possible SPCC sites	Met Goal - At this time, the District has one site that has above ground diesel storage. That tank holds 2500 gallons of diesel and is located at the water treat plant. The treatment facility is approximately one mile from Brushy Creek. Staff does not feel that a SPCC plan is necessary for this site.
5	Maintain vehicle maintenance records and reporting	Met Goal - the District’s regulatory compliance officer is in charge of vehicle and equipment maintenance. He also ensures that vehicle check lists are maintained. Each vehicle has its own file in the District’s shared drive.

5	Water Conservation	Met Goal - The District has made great strides in its effort to reduce unaccounted for water. Over the past 6 years unaccounted for water has been reduced from over 25% to around 10%
5	Employee Training	Goal – Provided 5 training classes on storm water, wastewater, environmental topics. 10 employees attended
5	Pet Waste	Met Goal – Weekly inspection of 39 pet waste stations.
6	N/A	
7	N/A	The District did not have any construction projects where the District was the operator.

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.?

The District did not perform any lab testing during this reporting period. The District did perform other tasks to ensure the success of the SWMP at reducing the discharge of pollutants to the MEP. Those tasks were:

- Inspections of construction sites
- Weekly inspections of wet ponds
- Cleaning and maintenance of wet ponds
- Cleaning and filming of sewer lines (over 70,000 feet)
- Inspection of sewer manholes (150)
- Cleaning and inspection of dry ponds
- Daily inspection and regular maintenance of the District's lift stations
- Wet pond repair

D. Impaired Waterbodies

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.

No newly impaired water bodies have been identified within the District.

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.

The District is located within the Edwards Aquifer recharge zone. This means that 20% of our wastewater lines are filmed annually. In this reporting year, the District contracted out the filming of 71,000 feet of sewer line. These lines were also cleaned. The films were reviewed by a professional engineer. Any issues that are found will be repaired. That portion of the line will then be filmed again and sent to the engineer once again to ensure that the issue had been resolved.

This year District staff began a program of inspection of the manholes in the filming area, over 150 manholes were inspected. Any deficiencies found in the sewer lines or manholes will have to be addressed within a year of notification.

3. Describe the implementation of targeted controls if the small MS4 discharges to an impaired water body with an approved TMDL. **N/A**
4. Report the benchmark identified by the MS4 and assessment activities: **N/A**

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

5. Provide an analysis of how the selected BMPs will be effective in contributing to achieving the benchmark: **N/A**

Benchmark Parameter	Selected BMP	Contribution to achieving Benchmark
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6. If applicable, report on focused BMPs to address impairment for bacteria:

Description of bacteria-focused BMP	Comments/Discussion
Sewer filming	This is performed annually on at least 20% of the District's sewer infrastructure. The goal here is to ensure that the entire system is filmed over a five-year period. These films are reviewed by an engineer and any issues are noted and addressed by District staff or contractors. The engineer prepares a certification letter annually to show that this filming and repair work has been accomplished.
Manhole inspections	Manholes are inspected within the area designated for annual filming. These inspections are performed to see if there are any exfiltration issues.
Pet Waste Sites	Parks staff maintain pet waste stations on a weekly basis. New stations are installed where they are found to be needed

Storm Inlet Cleaning	Cleaning of inlets removes decaying organics that would eventually make their way into the receiving stream. Staff also checks for standing water which may be a mosquito breeding pool.
Wet Pond Inspections	The District's 11 wet ponds are inspected and maintained monthly by a private contractor. District personnel also check and maintain the ponds on a weekly.

7. Assess the progress to determine BMP's effectiveness in achieving the benchmark.

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

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

Benchmark Indicator	Description/Comments
Household Hazardous Waste Vouchers	The District provided 299 household hazardous waste vouchers to residents, so they can safely dispose of household waste.

Educational Opportunities	<p>Staff attended an elementary school science fair where they spoke about storm water and water conservation and handed out educational material pertaining to water, wastewater and stormwater.</p> <p>Staff also attended three District events where educational material was given out. This information included brochures on storm water, fats, oils and greases, organic gardening, and water conservation.</p> <p>Staff has an article in the District's newsletter monthly.</p>
Maintain web page	<p>The District's main utility page was viewed over 25,000 times over the course of the reporting period. This page contains information about water reports, quality, conservation and watering stage. It provides wastewater information.</p> <p>It provides information concerning the sewer inspection program in the wastewater section.</p> <p>The stormwater page has information on the SWMP, pollution prevention, and household hazardous waste vouchers.</p> <p>There is also a household water use calculator.</p>
Reduction in SSOs	The District did not have any overflows during the reporting period.
Construction Plan Review and Inspection	This ensures that erosion control was adequate and placed in its proper place. The inspections ensured that it was properly maintained.
Stream cleanup	The District held two creek clean up events. There were over 200 hours of volunteer time for these events
Vehicle Maintenance	District vehicles are maintained to a high standard. The District also has a replacement plan that replaces vehicles at 7 years or 120,000 miles.

E. Stormwater Activities

Describe activities planned for the next reporting year:

MCM(s)	BMP	Stormwater Activity	Description/Comments
1.0 Public Education	Stormwater Website, Newsletter, Classroom training, UIAC, and stream cleanup		The District will continue with activities related to educating our residents through our newsletter, classroom training, UIAC, and stream cleanup. Also, the Asset Management Plan will be completed which will provide the District the tools to plan and include proactive steps needed to address pollution prevention through its infrastructure.
2.0 Illicit Discharge	2.4 Sanitary Sewer	Cleaning and filming of 20% of the District's collection system	The District will contract out the filming of approximately 74,000 feet of sewer line in FY 2020. The District has started a new program of inspecting the manholes within the filming area.
3.0 Construction Site Stormwater Runoff	3.2 Plan Review 3.3 Inspection	Continuing plan review of all new Construction within the District and inspection of those sites as construction progresses	The District's construction activity will nearly be completed during FY 2020. Residential construction should be finished except for a few private lots and commercial construction should also be nearly complete.
4.0 Post Construction	4.3 Inspections	The District contracts with an outside contractor to maintain the District's 11 wet ponds	Contractor performs monthly operation and maintenance. This includes pond inspections, clean up, any maintenance that is needed, and upkeep of the vegetation.
5.0	5.8 Water Conservation	The District will continue its leak detection program	District personnel on a weekly basis distribute leak loggers to search for possible service line, hydrant, or main leaks.

F. SWMP Modifications

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

X Yes ___ No

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

☐ Yes ☒ No

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

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

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

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

G. Additional BMPs for TMDLs and I-Plans

Provide a description and schedule for implementation of additional BMPs that may be necessary, based on monitoring results, to ensure compliance with applicable TMDLs and implementation plans. **N/A**

BMP	Description	Implementation Schedule (start date, etc.)	Status/Completion Date (completed, in progress, not started)

H. Additional Information

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

☐ Yes ☒ 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:

Name and Explanation:

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

☐ Yes ☒ 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: _____

Authorization Number: _____ Permittee: _____

Authorization Number: _____ Permittee: _____

Authorization Number: _____ Permittee: _____

I. Construction Activities

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

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

☐ Yes ☒ No

2b. If "yes," then provide the following information for this permit year:

The number of municipal construction activities authorized under this general permit	
The total number of acres disturbed for municipal construction projects	0

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

J. Certification

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

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

Name (printed): _____ Title: _____

Signature: _____ Date: _____

Name of MS4 _____

Name (printed): _____ Title: _____

Signature: _____ Date: _____

Name of MS4 _____

Name (printed): _____ Title: _____

Signature: _____ Date: _____

Name of MS4 _____

Name (printed): _____ Title: _____

Signature: _____ Date: _____

Name of MS4 _____

Name (printed): _____ Title: _____

Signature: _____ Date: _____

Name of MS4 _____

If you have questions on how to fill out this form or about the Stormwater Permitting program, please contact us at 512-239-4671.

Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, contact us at 512-239-3282.

