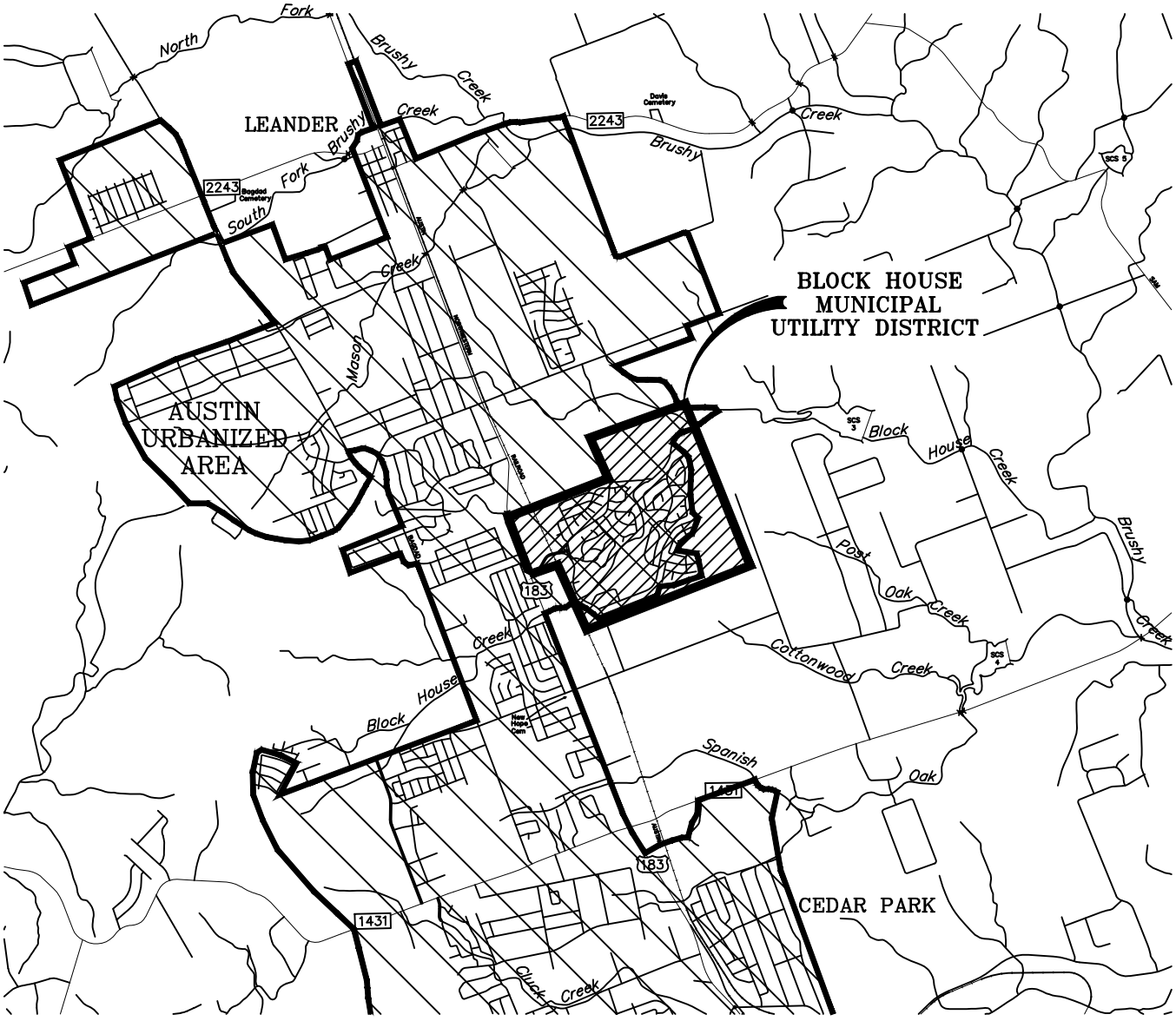
MS4 ANNUAL REPORT
PERMIT YEAR 2: 2020

FOR

BLOCK HOUSE
MUNICIPAL UTILITY DISTRICT

WILLIAMSON COUNTY, TEXAS
Permit No. TXR 040313



MARCH 2021
JC Job No. 0A505–0004–00

JONES | CARTER
Texas Board of Professional Engineers Registration No. F-439
6330 West Loop South, Suite 150 • Bellaire, TX 77401 • 713.777.5337

Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number TXR040000

A. General Information

Authorization Number: TXR040313

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

Annual Reporting Year Option Selected by MS4:

Calendar Year: X

Permit Year: _____

Fiscal Year: _____ Last day of fiscal year: _____

Reporting period beginning date: (month/date/year): January 1, 2020

Reporting period end date: (month/date/year): December 31, 2020

MS4 Operator Level: Level 2

Name of MS4: Block House MUD MS4

Contact Name: Liz Stone Telephone Number: (281) 363-4039

Mailing Address: 1575 Sawdust Road, Suite 400, The Woodlands, TX 78380

E-mail Address: mstone@jonescarter.com

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.	Yes		The MS4 submitted their SWMP to TCEQ by the requested deadline, and SWMP is currently in review by the TCEQ; Annual Report was completed based on the SWMP that was submitted at this time.
Permittee is currently in compliance with recordkeeping and reporting requirements.	Yes		The MS4 has submitted a concise annual report and retained applicable records as outlined in the TPDES General Permit No. TXR040000.
Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.).	Yes		The MS4 meets all eligibility requirements outlined in the TPDES General Permit No. TXR040000.
Permittee conducted an annual review of its SWMP in conjunction with preparation of the annual report	Yes		The MS4 has conducted an annual review of the SWMP as outlined in the TPDES General Permit No. TXR040000.

2. Provide a general assessment of the appropriateness of the selected BMPs. You may use the table below to meet this requirement:

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
1.	3.1 Utility Bill Inserts	YES. The MS4 distributed 2,165 storm water educational inserts in July 2020 to the residents regarding municipal storm sewer discharge and storm water quality issues.

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
1.	3.2 Utilize MS4 Website	YES. The MS4 placed their Permit Year 1 Annual Report on its website (www.blockhousemud.com) to meet the General Permit requirements. The MS4 published three (3) community newsletters that had storm water quality information such as recycling and bulk waste guidelines, what is allowed in the sanitary sewer lines, and reminding residents that illegal dumping activities are prohibited. These newsletters are mailed to residents and are all provided on the MS4 website.
1.	4.1 Storm Drain Marking	YES. Approximately, 382 inlet markers and 42 outfall markers have been placed by volunteers through the beginning of the MS4's marking program. The MS4 will continue promoting the inlet marking program to inspect and replace missing or damaged inlet markers.
1.	4.2 Recycling/Trash Clean-up	YES. A weekly recycling program was provided to all residents within the MS4. In August 2020, several volunteers collected approximately 4 bags of miscellaneous trash and vegetative debris from one of the MS4's community parks. Additionally, in June and October 2020, respectively, the MS4 held bulk waste/trash Cleanup Days and approximately 44,806 pounds of waste was collected.
2.	3.1 Maps of Inlets, Storm Sewer Lines, Outfalls, Surface Water & Structural Controls	YES. The MS4 map which identifies the approximate location of all inlets, outfalls, surface waters, and structural controls was evaluated and no updates were needed in Permit Year 2.

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
2.	4.1 Training for Illicit Discharge Detection & Elimination	YES. An MS4 Training Session was conducted on July 14, 2020 through a webinar by the MS4 Administrator. The training presentation described the impacts storm water discharges have on local water ways and how to identify illicit discharges, illegal connections, and illegal dumping. The recorded presentation was also placed on the MS4 Administrator's website https://www.jonescarter.com/municipal-separate-storm-sewer-system-training/. A digital sign-in sheet and certificate of completion were documented for the attendees.
2	5.1 Public Reporting Using Utility Bill Inserts	YES. One stormwater educational insert was distributed to the community in the summer of 2020 for Permit Year 2. The insert provided a phone number and email address for residents to report illicit discharges and other pollution concerns.
2.	2.8.1 Dry Weather Field Screening	YES. The MS4 performed field inspections on 20% of their inlets and outfalls within the MS4 for signs of debris, trash, structural integrity, and other illicit discharges. Based on these inspections, 69 inlets and 9 outfalls were observed and recommendations were made on several of these features for corrective action. The field investigations assist in detecting and eliminating illicit discharges.
3.	6.1 Training for Construction Site Stormwater Runoff Control	YES. An MS4 Training Session was conducted on July 14, 2020 through a webinar by the MS4 Administrator. The MS4 Administrator provided educational training on how to identify construction site issues and enforcement procedures to ensure all construction sites maintain in compliance with the Construction General Permit TPDES TXR150000. The recorded presentation was also placed on the MS4 Administrator's website https://www.jonescarter.com/municipal-separate-storm-sewer-system-training/. A digital sign-in sheet and certificate of completion were documented for the attendees.

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
4.	6.1 Training for Post-Construction Stormwater Controls	YES. An MS4 Training Session was conducted on July 14, 2020 through a webinar by the MS4 Administrator. The training presentation provided information on the post-construction site storm water runoff control program, the guidance documents that are referenced, and how to inspect/maintain the MS4's permanent structural controls. The recorded presentation was also placed on the MS4 Administrator's website https://www.jonescarter.com/municipal-separate-storm-sewer-system-training/. A digital sign-in sheet and certificate of completion were documented for the attendees.
5.	4.1 Training for Pollution Prevention & Good Housekeeping	YES. An MS4 Training Session was conducted on July 14, 2020 through a webinar by the MS4 Administrator. The training presentation provided educational training to those who are responsible for implementing pollution prevention measures and good housekeeping principals in municipal activities and municipally owned facilities. The recorded presentation was also placed on the MS4 Administrator's website https://www.jonescarter.com/municipal-separate-storm-sewer-system-training/. A digital sign-in sheet and certificate of completion were documented for the attendees.
5.	5.1 Disposal of Waste	YES. The MS4 has two (2) spill response kits - one at the booster pump facility and the other one in an Operator's vehicle. The MS4 Operator ensured that all waste collected at MS4 facilities was properly disposed in accordance with 30 TAC Chapter 330 and 335.

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
5.	7.1 Municipal Operation & Maintenance Activities	YES. The MS4's Emergency Spill Response Plan was evaluated and no changes were needed in Permit Year 2. In Permit Year 2, the MS4 finalized written inspection and follow-up procedures for illicit discharges, construction stabilization measures, and municipal facilities. These procedures will be referenced by the MS4, as needed. In Permit Year 2, upon the review of their municipal facilities from BMP 5.3.1, the MS4 developed a list of possible pollutant of concerns and pollution prevention measures to minimize the effect of these pollutants.

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:

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
1.	3.1	Utility Bill Inserts	2,165	Storm Water Educational Inserts	NO. Though this BMP does not result in a direct reduction of pollutants, storm water educational inserts provide public education to residents on good housekeeping principles and pollution prevention measures.

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
1.	3.2	Utilize MS4 Website	1 3	Permit Year 1 Annual Report Electronic Newsletters	NO. The MS4 placed their Permit Year 1 Annual Report on its website (www.blockhousemud.com) to meet the General Permit requirements. The MS4 published three (3) community articles on their Block House MUD "Update" newsletter that had storm water quality information such as recycling and bulk waste guidelines, what is allowed in the sanitary sewer lines, and reminding residents that illegal dumping activities are prohibited. The BMPs do not directly reduce pollutants into the receiving stream but help to educate the public.
1.	4.1	Storm Drain Marking	382 42	Inlet Markers Outfall Markers	YES. Approximately, 382 inlet markers and 42 outfall markers have been placed by volunteers through the beginning of the MS4's inlet marking program. Since these are placed on inlets and outfalls which are directly connected to the MS4, this BMP can have a direct impact in the reduction of pollutants.

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
1.	4.2	Recycling/Trash Clean-up	52 13 47,786 365	Weekly Bags of Trash Collected Pounds of Residential Bulk Waste Daily Pet Waste Removal	YES. A residential, weekly recycling program was provided to all residents within the MS4. In February 2020 and August 2020, several volunteers collected in all approximately 9 bags of miscellaneous trash and vegetative debris from one of the MS4's community parks. In June and October 2020, the MS4 held bulk waste/trash events and approximately 47,786 pounds of waste was collected in total. Several pet waste stations are provided in the MS4 for residents to properly dispose of pet waste. These BMPs have a direct reduction in pollutants by removing waste and promoting good housekeeping principles.
1.	5.1	Opportunity for Public Comment	12	Public Opportunity	YES. Permit Year 2 BMPs were discussed at the District's monthly Board Meetings. The Board meetings are open to the public allowing residents to provide comments during the meeting. This BMP can have a direct reduction in pollutants, but it depends on the manner of the comment. No comments were received in Permit Year 2.

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
2.	3.1	Maps of Inlets, Storm Sewer Lines, Outfalls, Surface Waters, & Structural Controls	1	MS4 Map	NO. The MS4 map of inlets, outfalls, storm sewer lines, structural controls and surface wastes was evaluated and no updates were needed in Permit Year 2. This BMP is helpful when tracking illicit discharges but does not directly reduce pollutants.
2.	4.1	Training for Illicit Discharge Detection and Elimination	1	Training Program	YES. The MS4 Training Session was conducted on July 14, 2020 through a webinar. The training presentation can have a direct reduction in pollutants by helping field personnel identify and illicit discharge.
2.	5.1	Public Reporting Using Utility Bill Inserts	2,165	Storm Water Educational Inserts	YES. One stormwater educational insert was distributed to the community in the summer of 2020 for Permit Year 2 that provided a phone number and email address for residents to report illicit discharges and other pollution concerns. This BMP can directly impact the reduction of pollutants in stormwater.

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
2.	5.2	Public Reporting Using Electronic Education	1	Form on MS4 Website	NO. The MS4 provides an electronic form on their website for residents to report any environmental problems, complaints, or concerns (www.blockhousemud.com). While the website helpful in engaging the public, it does not directly reduce pollutants.
2.	6.1	Responding to Illicit Discharge & Spills	3	Illicit Discharges	YES. Three (3) illicit discharges were reported to the MS4 during Permit Year 2. The Operator for the MS4 responded promptly to the incidents. This BMP directly impacts the reduction of pollutants in stormwater.
2.	6.2	Source Investigation of Illicit Discharges	3	Illicit Discharges	YES. The three (3) illicit discharges for Permit Year 2 were investigated, as needed. The Operator for the MS4 visited the sites, as appropriate, and performed visually confirmation that illicit material has been improperly disposed. This BMP directly impacts the reduction of pollutants in stormwater.

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
2.	6.3	Source Elimination of Illicit Discharges	3	Illicit Discharges	YES. The three (3) illicit discharges were promptly cleaned up, as needed. The illicit discharges were documented with photographs taken, as appropriate. The MS4 did not issue Notice of Violations since all incidents were properly investigated and eliminated. This BMP can directly impact the reduction of pollutants in stormwater.
2.	7.1	Evaluation of Drainage Rules for Illicit Discharge	1	Drainage Rules	YES. The MS4 reviewed their Drainage Rules in Permit Year 2 and revisions were recommended. These revisions will be further evaluated in Permit Year 3, and draft Drainage Rules will be prepared for formal consideration and adoption.

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
2.	8.1	Dry Weather Field Screenings	69 9	Inlets Outfalls	YES. Approximately 20% of the MS4's inlets and outfalls were inspected in November and December 2020 for signs of debris, trash, structural integrity, and illicit discharges. Based on these inspections, 69 inlets and 9 outfalls were inspected. It was recommended that 32 inlets and 3 outfalls were deficient and recommendations were made for corrective action. Recommendations were provided to the MS4 that may be performed in the upcoming permit year. This BMP directly impacts the reduction of pollutants in stormwater.
3.	3.1	Evaluation of the Drainage Rules for Construction Site Stormwater Runoff Control	1	Drainage Rules	YES. The MS4 reviewed their Drainage Rules in Permit Year 2 and revisions were recommended. These revisions will be further evaluated in Permit Year 3, and draft Drainage Rules will be prepared for formal consideration and adoption.
3.	6.1	Training for Construction Site Stormwater Runoff Control	1	Training Program	YES. The MS4 Training Session was conducted on July 14, 2020 through a webinar. The training presentation can have a direct reduction in pollutants by helping field personnel identify and illicit discharge.

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
3.	7.1	Guidance Manual for Construction Site Stormwater Runoff Control	1	Guidance Manual	NO. The "Environmental Criteria Manual – Section 1 Water Quality Management - Erosion and Sedimentation Control Criteria" by the City of Austin was utilized to aid in implementing construction site BMPs. While the guidance manual provides information on how to provide long-term maintenance of post-construction stormwater control measures it does not have a direct reduction in pollutants.
4.	3.1	Evaluation of Drainage Rules to Address Post Construction Runoff	1	Drainage Rules	YES. The MS4 reviewed their Drainage Rules in Permit Year 2 and revisions were recommended. These revisions will be further evaluated in Permit Year 3, and draft Drainage Rules will be prepared for formal consideration and adoption.

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
4.	4.1	Guidance Manual for Post-Construction Stormwater Controls	1	Guidance Manual	NO. The "Environmental Criteria Manual – Section 1 Water Quality Management - Erosion and Sedimentation Control Criteria" by the City of Austin was utilized to aid in implementing post-construction BMPs. While the guidance manual provides information on how to provide long-term maintenance of post-construction storm water control measures it does not have a direct reduction in pollutants.
4.	6.1	Training for Post-Construction Stormwater Controls	1	Training Program	YES. The MS4 Training Session was conducted on July 14, 2020 through a webinar. The training presentation can have a direct reduction in pollutants by helping field personnel identify and illicit discharge.
5.	3.1	Inventory of Facilities & Stormwater Structural Controls	1	List of Municipal Facilities	NO. The MS4's inventory of facilities and storm water structural controls was evaluated and updated as needed in Permit Year 2. This list does not have a direct reduction in pollutants in the MS4.
5.	4.1	Training for Pollution Prevention & Good Housekeeping	1	Training Program	YES. The MS4 Training Session was conducted on July 14, 2020 through a webinar. The training presentation can have a direct reduction in pollutants by helping field personnel identify and illicit discharge.

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
5.	5.1	Disposal of Waste	2	Spill Response Kits	YES. The MS4 has two (2) spill response kits - one at the booster pump facility and the other one in an Operator's vehicle. The MS4 Operator ensured that all waste collected at MS4 facilities was properly disposed in accordance with 30 TAC Chapter 330 and 335. This BMP can directly impact the reduction of pollutants in stormwater.
5.	7.1	Municipal Operation & Maintenance Activities	1 1 1	Emergency Spill Response Plan Written Inspection and Follow-up Procedures List of Pollutant of Concerns & Pollution Prevention Measures	YES. The MS4's Emergency Spill Response Plan was evaluated and minor changes were needed in Permit Year 2. In Permit Year 2, the MS4 finalized written inspection and follow-up procedures for illicit discharges, construction stabilization measures, and municipal facilities. These procedures will be referenced by the MS4, as needed. In Permit Year 2, upon the review of their municipal activities, the MS4 developed a list of possible pollutant of concerns and pollution prevention measures to minimize the effect of these pollutants. These BMPs can directly reduce pollutants in storm water.

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

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
1.	3.1 Utility Bill Inserts – Distribute to 100% of the MS4 Annually	MET GOAL. The MS4 distributed 2,165 storm water educational inserts in July 2020 to the residents regarding municipal storm sewer discharge and storm water quality issues.
1.	3.2 Utilize MS4 Website – post approved SWMP, submitted Annual Report and electronic educational material	MET GOAL. The MS4 placed their Permit Year 1 Annual Report on its website (www.blockhousemud.com). The MS4 published three (3) community newsletters that had various educational information. The approved SWMP will be posted when available.
1.	4.1 Storm Drain Marking – report 100% of installed markers annually	MET GOAL. Approximately 382 inlet markers and 42 outfall markers were installed by volunteers in previous permit years. The MS4 will continue promoting the inlet marking program to install new and missing inlet markers in the upcoming permit years.
1.	4.2 Recycling/Trash Clean-up – provide one recycling/clean-up event annually	EXCEEDED GOAL. A weekly, residential recycling program was provided to all residents within the MS4. In August 2020, a volunteer clean-up event occurred in one of the MS4's community parks and two (2) community bulk waste events occurred in Permit Year 2 for residents to properly dispose of these items. This goal was exceeded because the MS4 held more events than stated in the SWMP.
1.	5.1 Opportunity for Public Comment – hold Monthly Board Meeting	MET GOAL. All monthly Board Meetings are open to the public. Residents, businesses, and other interested parties within the MS4 area have an opportunity to comment on the SWMP. No comments were received in Permit Year 2.

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
2.	3.1 Maps of Inlets, Storm Sewer Lines, Outfalls, Surface Waters, & Structural Controls – evaluate and update	MET GOAL. The MS4 map was evaluated and no updates were needed in Permit Year 2.
2.	4.1 Training for Illicit Discharge Detection & Elimination – hold one training session annually	MET GOAL. The MS4 held one training session on July 14, 2020 through a webinar. A digital sign-in sheet and certificate of completion were documented for the attendees.
2.	5.1 Public Reporting Using Utility Bill Inserts – distribute to the community annually	MET GOAL. One stormwater educational insert was distributed to the community in the summer of 2020 for Permit Year 2. The insert provided a phone number and email address for residents to report illicit discharges and other pollution concerns.
2.	5.2 Public Reporting Using District Website – Ensure Contact Information is on Website	MET GOAL. The MS4 provided an electronic form on its website for residents to report any environmental problems, complaints, or concerns.
2.	6.1 Responding to Illicit Discharges & Spills – respond to 100% of reported potential illicit discharges	MET GOAL. Three (3) illicit discharges were reported during Permit Year 2. The Operator for the MS4 responded to these incidents and conducted site inspections, as needed.
2.	6.2 Source Investigation of Illicit Discharges – respond to 100% of reported potential illicit discharges	MET GOAL. Three (3) illicit discharges for Permit Year 2 were investigated, as needed, by the Operator for the MS4. They visually confirmed that illicit discharges had been improperly disposed and back-tracked, as applicable, their source.

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
2.	6.3 Source Elimination of Illicit Discharges – respond to 100% of reported potential illicit discharges	MET GOAL. The three (3) illicit discharges that were reported to the MS4 were promptly cleaned-up, as applicable. It was assumed that if pollutants entered the receiving water body, they did not cause a negative effect.
2.	7.1 Evaluation of the Drainage Rules for Illicit Discharges – annually review & continue implementing	MET GOAL. The MS4 evaluated their Drainage Rules in Permit Year 2 and revisions were recommended. These comments will be further evaluated in Permit Year 3, and revised Drainage Rules may be prepared for formal consideration and adoption.
2.	8.1 Dry Weather Field Screening – inspect 20% of storm water structural controls	MET GOAL. The MS4 conducted field observations on 20% of their inlets and outfalls. If an illicit discharge was observed, it was investigated, inspected and recommendations were made for its removal.
3.	3.1 Evaluation of the Drainage Rules for Construction Site Stormwater Runoff Control – annually review & continue implementing	MET GOAL. The MS4 evaluated their Drainage Rules in Permit Year 2 and revisions were recommended. These comments will be further evaluated in Permit Year 3, and revised Drainage Rules may be prepared for formal consideration and adoption.
3.	4.1 Construction Site Plan Review – review 100% of applicable site plan reviews	MET GOAL. Zero (0) construction drawings were received and reviewed on all applicable projects to prevent water quality impacts within the MS4.
3.	5.1 Construction Site Inspection & Enforcement – inspect 100% of applicable construction sites	MET GOAL. Zero (0) construction inspections were performed on applicable projects to ensure no threat exists to the environment as a result of construction activities.

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
3.	6.1 Training for Construction Site Stormwater Runoff Control – hold one training session annually	MET GOAL. The MS4 held one training session on July 14, 2020 through a webinar. A digital sign-in sheet and certificate of completion were documented for the attendees.
3.	7.1 Guidance Manual for Construction Site Stormwater Runoff Control – continue utilizing	MET GOAL. The MS4 continued to utilize "Environmental Criteria Manual – Section 1 Water Quality Management - Erosion and Sedimentation Control Criteria" by the City of Austin to aid in implementing construction site BMPs.
4.	3.1 Evaluation of the Drainage Rules to Address Post Construction Runoff – annually review & continue implementing	MET GOAL. The MS4 evaluated their Drainage Rules in Permit Year 2 and revisions were recommended. These comments will be further evaluated in Permit Year 3, and revised Drainage Rules may be prepared for formal consideration and adoption.
4.	4.1 Guidance Manual for Post-Construction Stormwater Controls – continue implementing	MET GOAL. The MS4 continued to utilize "Environmental Criteria Manual – Section 1 Water Quality Management - Erosion and Sedimentation Control Criteria" by the City of Austin to aid in implementing post-construction BMPs.
4.	5.1 Inspection Program for Post-Construction Stormwater Controls – inspect 100% structural post-construction controls	MET GOAL. As a result of no construction activities occurring within the MS4, no post-construction site inspections were performed on any applicable projects to ensure permanent structural controls were properly constructed reducing the potential impact of illicit discharges.
4.	6.1 Training for Post-Construction Stormwater Controls – hold one training session annually	MET GOAL. The MS4 held one training session on July 14, 2020 through a webinar. A digital sign-in sheet and certificate of completion were documented for the attendees.

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
5.	3.1 Inventory of Facilities & Stormwater Structural Controls – maintain and update, as needed.	MET GOAL. The MS4's inventory list of facilities and storm water quality controls was evaluated and updated as needed in Permit Year 2.
5.	4.1 Training for Pollution Prevention & Good Housekeeping – hold one training session annually	MET GOAL. The MS4 held one training session on July 14, 2020 through a webinar. A digital sign-in sheet and certificate of completion were documented for the attendees.
5.	5.1 Disposal of Waste – document number of spill response kits	MET GOAL. The MS4 has two (2) spill response kits available for their use. The MS4 ensured all waste materials removed are properly disposed of in accordance with 30 TAC Chapters 330 or 335 and do not contribute as pollutants within the MS4.
5.	6.1 Contractor Oversight – Research Phase	MET GOAL. The MS4 began to research appropriate text to use in contractors' legal documents/agreements with the MS4 that states their work performed on MS4-owned and/or operated facilities will not have a negative effect on the storm sewer system and will not release runoff that may be considered an illicit discharge.
5.	7.1 Municipal Operation & Maintenance Activities – summarize O&M activities	MET GOAL. The MS4's Emergency Spill Response Plan was evaluated and minor changes were needed in Permit Year 2. The MS4 finalized written inspection and follow-up procedures for illicit discharges, construction stabilization measures, and municipal facilities. In Permit Year 2, the MS4 developed a list of possible pollutant of concerns and pollution prevention measures to minimize the effect of these pollutants.

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.?

Due to allocated resources the MS4 did not conduct sampling nor analytical monitoring. The MS4 has provided qualitative information as proof of successfully achieving the measureable goals and benchmarks.

The MS4 distributed 2,165 stormwater educational inserts to their water users in Permit Year 2. The inserts provided general information regarding storm water quality issues and promoted good housekeeping practices. The inserts also provided the MS4 District Operator's phone number and an email address for residents to report illicit discharges and other environmental concerns.

On the MS4's website, www.blockhousemud.com, three newsletters were posted that have various public education material that pertain to recycling and bulk waste guidelines, what is allowed in the sanitary sewer lines, and reminding residents that illegal dumping activities are prohibited in the community. The website also provided an electronic form for residents to report any environmental issues such as illicit discharges or illegal dumping.

Pet waste stations were utilized in the MS4 service area in Permit Year 2. These stations assisted the residents in properly disposing of their pet waste. The MS4 will continue to maintain these locations.

The MS4 held two (2) volunteer clean-up events during Permit Year 2. The February 2020 clean-up event occurred at a dry creek portion of an MS4-owned park and nine (9) bags of trash and miscellaneous debris was collected. The August 2020 event occurred in the same area and four (4) of miscellaneous waste was removed. The MS4 also sponsored two (2) bulk waste events in 2020. The June 2020 event collected approximately 34,380 pounds of waste and the October 2020 event collected 13,406 pounds. These amounts were provided by the consultant that properly collected and disposed of the bulk waste material.

The MS4 continued the dry weather field screening program to assist in detecting and eliminating illicit discharges. Every permit year 20% of the MS4's storm water structural controls are inspected. A total of 69 inlets and nine (9) outfalls were inspected during Permit Year 2 for signs of debris, trash, structural integrity, and other illicit discharges. Recommendations to address some issues or other deficiencies observed from the screening are expected to be performed in the upcoming permit year.

Three (3) illicit discharges were reported in Permit Year 2. The first illicit discharge was reported to the MS4 on February 7, 2020. A garbage truck performing their regular route in the community, noticed that their vehicle was leaking oil. The garbage company notified the MS4, provided photos, and mobilized a street cleaning machine to contain the potential pollutants. The work was completed by the company and it was observed by the MS4 that no known illicit material entered the storm sewer system. The second illicit discharge occurred during the weekend of February 15, 2020. A house fire occurred in the District and local firefighters used a fire suppression foam called "Direct Attack Class A Foam". The MS4 received the Material Safety Data Sheet - MSDS - for the substance to assess the potential impact this may have on a nearby water body. This material

entered the storm sewer inlets and flowed to an adjacent creek. The Operator for the MS4 inspected this creek the Monday following the fire (February 17, 2020) and no concerning observations were noted. Additionally, in accordance with the Phase II General Permit emergency firefighting activities are allowed in the MS4, but the MS4 still completed an illicit discharge form and saved all documentation for this event. The third illicit discharge occurred on February 27, 2020. A resident in the MS4 observed a paint contractor pouring paint into a storm sewer inlet near a house that was unoccupied and being remodeled. The Operator for the MS4 performed a visual inspection of the nearby storm inlets and observed evidence of this illicit discharge. The paint had already hardened by this time, but it had not entered the receiving water body. It was decided to leave the paint residue as is. A Notice of Violation was not issued since the paint contractor was not present at the time of the inspection.

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.

   Block House MUD MS4 discharges storm water indirectly into unclassified segment 1244A – Brushy Creek Above South Brushy Creek. This unclassified segment is not listed in the latest EPA-approved 303(d) list nor the most recent Texas Integrated Report for Surface Water Quality for CWA Section 305(b) and 303(d).

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.

   N/A

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:

Benchmark Parameter	Benchmark Value	Description of additional sampling or other assessment activities	Year(s) conducted
N/A	N/A	N/A	N/A

5. Provide an 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.

Benchmark Indicator	Description/Comments
N/A	N/A

E. Stormwater Activities

Describe activities planned for the next reporting year:

MCM(s)	BMP	Stormwater Activity	Description/Comments
1	1.3.1	Utility Bill Inserts	Update/revise the education material, as needed, and distributed education material annually to 100% of the community.
1	1.3.2	Utilize MS4 Website	Post the approved SWMP and submitted Annual Report to the MS4's website, when available. Continue to provide storm water quality information on the MS4's website.
1	1.4.1	Storm Drain Marking	Promote opportunities for volunteers to replace missing/illegible markers, as needed. Report 100% of installed storm drain markers.
1	1.4.2	Recycling/Trach Clean-Up	Continue the volunteer recycling program throughout the permit year. Provide the number of households or frequency of pick-up.
1	1.5.1	Opportunity for Public Comment	Continue to hold monthly (12) public meetings where the general public can address question/comments about the SWMP. If available, the public notice will be published in accordance with the General Permit.
2	2.3.1	Maps of Inlets, Storm Sewer Lines, Outfalls, Surface Waters & Structural Controls	Update/revise the map if new data related to the storm sewer system is identified.
2	2.4.1	Training for Illicit Discharge Detection & Elimination	Hold at least one (1) training session annually and offer the training program to appropriate staff.
2	2.5.1	Public Reporting using Utility Bill Inserts	Advertise the current contact information for the MS4 and distribute to 100% of the MS4 annually.

MCM(s)	BMP	Stormwater Activity	Description/Comments
2	2.5.2	Public Reporting using Electronic Education	Continue to provide a link on the MS4 website for residents to report any environmental issues that may be occurring in the MS4.
2	2.6.1	Responding to Illicit Discharges & Spills	Respond to 100% of reported illicit discharges annually. Evaluate procedures for responding and conducting appropriate actions and update, if needed.
2	2.6.2	Source Investigation of Illicit Discharges	Investigate 100% of reported illicit discharges. Evaluate investigation procedures and update, if needed.
2	2.6.3	Source Elimination of Illicit Discharges	Eliminate 100% of reported illicit discharges, if applicable. Evaluate procedures and update, if needed.
2	2.7.1	Evaluation of the Drainage Rules for Illicit Discharge	Continue implementing the Drainage Rules. Review the Drainage Rules for any necessary changes to ensure compliance with the General Permit.
2	2.8.1	Dry Weather Field Screenings	Inspect 20% of the MS4's storm water structural controls and remove observed illicit discharge, if warranted.
3	3.3.1	Evaluation of the Drainage Rules for Construction Site Stormwater Runoff Control	Continue implementing the Drainage Rules. Review the Drainage Rules for any necessary changes to ensure compliance with the General Permit.
3	3.4.1	Construction Site Plan Review	Continue to conduct plan reviews of 100% of applicable submittals.
3	3.5.1	Construction Site Inspection & Enforcement	Continue to conduct construction site inspections on 100% of applicable construction sites.

MCM(s)	BMP	Stormwater Activity	Description/Comments
3	3.6.1	Training for Construction Site Stormwater Runoff Control	Hold at least one (1) training session annually and offer the training program to appropriate staff.
3	3.7.1	Guidance Manual for Construction Site Stormwater Runoff Control	Continue utilizing the guidance manual to aid in implementing construction site BMPs, as necessary.
4	4.3.1	Evaluation of the Drainage Rules to Address Post Construction Runoff	Continue implementing Drainage Rules. Review current Drainage Rules for any necessary changes to ensure compliance with the General Permit.
4	4.4.1	Guidance Manual for Post-Construction Stormwater Controls	Continue utilizing the guidance manual to aid in implementing post-construction site BMPs, as necessary.
4	4.5.1	Inspection Program for Post-Construction Stormwater Controls	Continue to conduct inspections on 100% of applicable, completed projects, as needed.
4	4.6.1	Training for Post-Construction Stormwater Controls	Hold at least one (1) training session annually and offer the training program to appropriate staff.
5	5.3.1	Inventory of Facilities & Stormwater Structural Controls	Maintain an MS4 inventory list of 100% permittee-owned facilities and storm water structural controls and update, as needed.
5	5.4.1	Training for Pollution Prevention & Good Housekeeping	Hold at least one (1) training session annually and offer the training program to appropriate staff.
5	5.5.1	Disposal of Waste	Review 30 TAC Chapters 330 and 335 and evaluate methods of waste disposal to ensure all waste is properly disposed and does not contributed as illicit material. Continue to ensure spill response kits are available for the MS4.

MCM(s)	BMP	Stormwater Activity	Description/Comments
5	5.6.1	Contractor Oversight	Finalize language to insert in new legal documents for new MS4 contractors to use the appropriate BMPs, control measures, and standard operating procedures to minimize potential runoff pollution.
5	5.7.1	Municipal Operation & Maintenance Activities	Identify and evaluate all operation and maintenance activities for their potential to discharge pollutants in stormwater.

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.
   _X__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)
Please reference attached email for additional information		

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.

TCEQ requested extensive changes to the SWMP upon TCEQ's technical review of the submitted SWMP. These changes affected all the BMPs and their measurable goals in the report. In lieu of providing the entire, revised proposed changes in the table above, the MS4 recommends referencing an email dated August 6, 2020 between Dante Fekete (Dante.Fekete@tceq.texas.gov) and Liz Stone (lstone@jonescarter.com) entitled *RE: Permit No. TXR040313 – Block House MUD – MS4 Authorization Application*. This correspondence has been attached after the signed certification, minus the attachments.

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

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.

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

H. Additional Information

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

   ___ Yes _X_ No

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

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

___ Yes _X_ No

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

___ Yes ___ No

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):

_____0_____

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

___ Yes _X_ No

2b. 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.*

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): Cecilia Roberts

Title: President, Board of Directors

Signature: Cecilia Roberts

Date: March 24, 2021

Name of MS4: **Block House MUD MS4**

Liz Stone

From: Dante Fekete <Dante.Fekete@tceq.texas.gov>
Sent: Thursday, August 6, 2020 10:17 AM
To: Liz Stone
Subject: Re: TXR040313 - Block House MUD - MS4 Authorization Application

Liz,

Thank you for completing the revisions for the Block House MUD Stormwater Management Program. The technical review is now **complete.**

You will see another email from myself once Public Notice documents are ready to be reviewed by the permittee.

Best Regards,

Dante Fekete

Texas Commission on Environmental Quality
Stormwater Team, MC 148
Phone: 512.239.4502

How is our customer service? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

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From: Liz Stone <lstone@jonescarter.com>
Sent: Wednesday, August 5, 2020 3:23 PM
To: Dante Fekete <Dante.Fekete@tceq.texas.gov>
Cc: Rebecca Villalba <rebecca.villalba@tceq.texas.gov>
Subject: FW: TXR040313 - Block House MUD - MS4 Authorization Application

The permittee's responses are in **red** below and a revised SWMP is attached for Block House MUD MS4, TXR040313.

If additional information is needed, please let me know.

Thank you,

Liz Stone, CPESC
MS4 Project Manager
mstone@jonescarter.com

JONES | CARTER
1575 Sawdust Road, Suite 400
The Woodlands, Texas 77380
Telephone 281.363.4039 Ext. 1504
Direct 713.389.1592

From: Stephen Fryer <Stephen.Fryer@tceq.texas.gov>
Sent: Friday, July 3, 2020 9:57 AM
To: Liz Stone <lstone@jonescarter.com>
Cc: Rebecca Villalba <rebecca.villalba@tceq.texas.gov>
Subject: TXR040313 - Block House MUD - MS4 Authorization Application

Good Morning Ms. Stone,

I am the permit coordinator assigned to the application for coverage under TCEQ's Phase II MS4 General Permit, TXR040313 for Block House Municipal Utility District (MUD), and I am currently conducting a technical review of the District's Stormwater Management Program (SWMP).

Upon reviewing the SWMP I have found that there is some additional information that will be required to complete this review process. Please review the following information and provide a response by, **August 7, 2020.**

Endangered Species Act:

During the Water Quality Standards Review of Block House MUD application and SWMP the following endangered species were identified in the receiving waterbodies of the MS4 as listed below:

Species:	**Latin Name:**
Coffin Cave mold Beetle	*Batrisodes texanus*
Tooth cave ground Beetle	*Rhadine persephone*
Bee Creek Cave Harvestman	*Texella reddelli*
Bone Cave Harvestman	*Texella reyesi*
Navasota ladies' tresses	*Spiranthes parksii*
Waterbody(ies), in which the species is/are present:	
Brazos River Basin	

Please update the District's SWMP to include a statement acknowledging the presence of the above listed species in the MS4's receiving waterbodies. **Text was added on page 3.**

If the District is performing any additional activities, BMPs, or controls related to the protection of these species, you also need to include this information in the SWMP.

Measurable Goals:

Unfortunately, many of the District's proposed measurable goals do not meet the requirements of being *clear, specific, and measurable.* Measurable goals should be quantifiable and used to gauge the effectiveness of your SWMP. For additional guidance please refer to the attached EPA "Measurable Goals Guidance" factsheet. As an example, I have included one acceptable BMP & measurable goal versus the same BMP written in an immeasurable format:

Acceptable Measurable Goal:

BMP/Activity	**Quantifiable target**	**Deadline**
Inspect construction sites	Inspect 80 % of active sites	Dec. 2020

Non-acceptable Measurable Goal:

BMP/Activity	**Quantifiable target**	**Deadline**
Inspect construction sites	Record number of sites inspected	Annually

By using a percentage, this still requires the permittee to keep track of how many sites they inspect (so they know when they have reached 80 %) – and this number will be included in the annual report. If the measurable goal is written with no target – just recording number - then the permittee would have satisfied their target if they reported 1 or 1,000 inspections.

At a minimum, your measurable goals should contain descriptions of actions you will take to implement each BMP, what you anticipate being achieved by each goal, and the frequency and dates for such actions to be taken.

All measurable goals under each MCM should be revised in a similar fashion to make them "measurable goals".

Text was added in the "Measurable Goals" sections for the BMPs to include quantifiable targets and deadlines.

Additionally, on page 57 of the District's SWMP there were multiple required elements found within one BMP. The BMP does not need to be broken up, but each required element must have a measurable goal and implementation schedule. In order to comply with the *General Permit,* the required elements listed below must each have a measurable goal and implementation schedule.

- Operation and maintenance (O&M) program in place or scheduled, to reduce/prevent pollution from municipal operations **This is included with evaluation of O&M activities**
- MS4 evaluates O&M activities for their potential to discharge pollutants in stormwater for road and parking lot maintenance, bridge maintenance, cold weather operations, and right-of-way maintenance etc. **Please note road and parking lot maintenance, bridge maintenance, and cold weather operations are not conducted by the MS4. Measureable goals and implementation schedule text was included in 5.7.1.1 for right-of-way maintenance.**

- MS4 identifies pollutants of concern that could be discharged from O&M activities **Text was included in 5.7.1.1**
- MS4 develop and implement pollution prevention measures that will reduce discharge of pollutants from O&M activities **Text was included in 5.7.1.1**
- MS4 inspects pollution prevention measures at MS4 facilities **This is included with development and implementation of pollution prevention measures.**

Please revise BMP5e on page 57 of the SWMP with a measurable goal and implementation schedule for each of the required elements listed above.

Missing Required Elements:

MCM 2: Illicit Discharge Detection & Elimination

- If illicit discharges or connections are observed, non-traditional MS4s notify other MS4 or TCEQ **Text was included in 2.6.2.1**
- Inspections in response to complaints **Text was included in 2.6.2.1**
- Procedures to prevent and correct leaking on-site sewage disposal systems **Text was included in 2.6.2.1**

Please update the SWMP to address the above referenced SWMP requirements for MCM 2.

MCM 3: Construction Site Stormwater Runoff Control

- Procedures for receipt and consideration from the public **Text was included in 3.5.1.1**

Please update the SWMP to address the above referenced SWMP requirements for MCM 3.

MCM 4: Post-construction Stormwater Manage

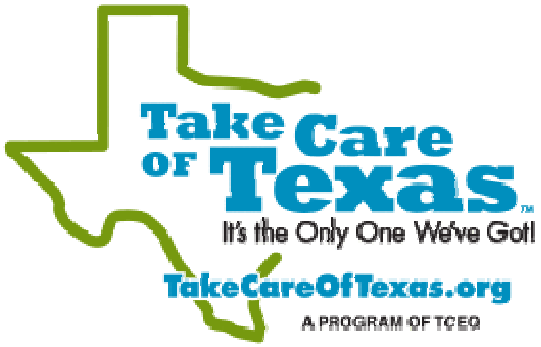
- Document and maintain records of enforcement actions **Text was included in 4.5.1.1**

Please update the SWMP to address the above referenced SWMP requirements for MCM 4.

Please note that BMP 5.6.1 Contractor Oversight was edited to correctly reflect the requirements of the General Permit.

If you need any additional information, please feel free to contact me at 512-239-4544.

Best Regards,



Stephen A. Fryer
TCEQ Stormwater Team, MC 148
stephen.fryer@tceq.texas.gov
Phone: 512.239.4544