

**City of Seabrook
Storm Water Management Program
Phase II MS4 Permit No. TXR040000**

City of Seabrook; Level 2a MS4

Seabrook, TX 77586

(281) 291-5600

1/13/2025

1.0 Public Education and Outreach

The Public Education and Outreach minimum measure consists of Best Management Practices (BMPs) that focus on the development of educational materials designed to inform the public about the impact that storm water discharges have on local water bodies and the steps that the public can take to reduce pollutants in storm water runoff. The BMPs describe how individuals and households will be informed about the steps they can take to reduce storm water pollution; how individuals and groups will be informed on how to become involved in the storm water program; and the mechanisms that will be used to reach target audiences. The target audiences for the education program are specified in education-related BMPs described in the other minimum control measures. The target audiences were selected based on regulation requirements and based on the goal of educating the community about the impact that storm water discharges have on local water bodies and the steps that the public can take to reduce pollutants in storm water runoff. The Public Education and Outreach program and BMPs, in combination, are expected to reach all the constituents within the MS4's permitted boundary. The target pollutant sources are construction site runoff, impacts from new and re-development, illicit discharges and other pollutant sources as identified to be of local concern (lawn waste, pet waste, grease/oils/fats), ie. approved TMDL parameters. Evaluation of the success of this minimum measure will be through careful analysis of the measurable goals for each BMP included in this minimum measure. Measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. The responsibility for implementation of this minimum measure is described with each BMP procedure.

Best Management Practices:

1. **(PE-1) Water Utility Bill Message:** Continue to distribute water utility bill message designed to direct the public to a website with information on storm water pollution prevention activities.

Implementation Tasks:

1. Mail water utility bill message directing public to website with information on:- Citizen reporting under the illicit discharge and construction programs- Water quality impacts of storm water runoff to local water bodies- Steps the public can take to reduce storm water pollution- Public Involvement Programs.
2. Update utility bill message with website address.
3. Distribute utility bill message with utility bills as scheduled.

Measurable Goals:

- 2025 (Year 1): Review/Update/Distribute utility bill message to **100%** of customers. Provide 5 examples of the message sent with annual report.
- 2026 (Year 2): Review/Update/Distribute utility bill message to **100%** of customers. Provide 5 examples of the message sent with annual report.
- 2027 (Year 3): Review/Update/Distribute utility bill message to **100%** of customers. Provide 5 examples of the message sent with annual report.
- 2028 (Year 4): Review/Update/Distribute utility bill message to **100%** of customers. Provide 5 examples of the message sent with annual report.
- 2029 (Year 5): Review/Update/Distribute utility bill message to **100%** of customers. Provide 5 examples of the message sent with annual report.

Responsible Party:

Public Works

- 2. **(PE-2) Social Media Posts:** post a minimum of four times per year with flyers and brochures for educating the public on storm water quality issues.

Implementation Tasks:

- 1. The message shall address ways attendees can minimize or avoid adverse stormwater impacts or practices to improve the quality of stormwater runoff.
- 2. The message shall be seasonally appropriate.
- 3. Must make minimum of one post per quarter and all quarterly posts must be visible by attendees for the full year, each year.

Measurable Goals:

- 2025 (Year 1): Develop/Review/Update subjects and provide **1** annual social media post. Provide the quarterly posts within the annual report.
- 2026 (Year 2): Develop/Review/Update subjects and provide **2** annual social media posts. Provide the quarterly posts within the annual report.
- 2027 (Year 3): Develop/Review/Update subjects and provide **3** annual social media posts. Provide the quarterly posts within the annual report.
- 2028 (Year 4): Develop/Review/Update subjects and provide **4** annual social media posts. Provide the quarterly posts within the annual report.
- 2029 (Year 5): Develop/Review/Update subjects and provide **4** annual social media posts. Provide the quarterly posts within the annual report.

Responsible Party:

Public Works and Public Affairs

- 3. **(PE-3) Storm Water Website:** Review, update, publish and maintain a website that informs the public about the impacts of storm water pollution and related pollution prevention activities.

Website address: <https://www.seabrooktx.gov/239/Streets-Traffic>

Implementation Tasks:

1. Maintain a webpage with current and accurate information and working links.
2. Check the website on the internet for public access at least once annually.
3. Must be maintained for the full year, each year.

Measurable Goals:

- 2025 (Year 1): Update/Review website. Provide screen shots of the website information within the annual report.
- 2026 (Year 2): Update/Review website. Provide screen shots of the website information within the annual report.
- 2027 (Year 3): Update/Review website. Provide screen shots of the website information within the annual report.
- 2028 (Year 4): Update/Review website. Provide screen shots of the website information within the annual report.
- 2029 (Year 5): Update/Review website. Provide screen shots of the website information within the annual report.

Responsible Party:

Public Works

4. (PE-4) Media/advertising campaign/public service announcements in areas of high visibility Billboard/poster; bus shelter/bench; radio/television/movie theater; and kiosks; Development and advertisement that focus on the impacts of storm water runoff local water bodies and steps the public can take to reduce storm water pollution.

Implementation Tasks:

1. Review, update and develop a list of storm water issues based on BMP's selected in the SWMP.
2. Identify issues to be included in the PSA's.
3. Develop/Update/Review PSA's on the selected subjects.
4. Contact local television and radio media for information on broadcasting of PSA's.
5. Broadcast PSA's as local media and radio schedules permit.

Measurable Goals:

- 2025 (Year 1): Review, update and develop appropriate issues to be included in the public service announcements. Provide/Place/Broadcast at least **five** announcements throughout the year. Provide the number of announcements and locations within the annual report.
- 2026 (Year 2): Review, update and develop appropriate issues to be included in the public service announcements. Provide/Place/Broadcast at least **five** announcements throughout the year. Provide the number of announcements and locations within the annual report.
- 2027 (Year 3): Review, update and develop appropriate issues to be included in the public service announcements. Provide/Place/Broadcast at least **five** announcements

throughout the year. Provide the number of announcements and locations within the annual report.

2028 (Year 4): Review, update and develop appropriate issues to be included in the public service announcements. Provide/Place/Broadcast at least **five** announcements throughout the year. Provide the number of announcements and locations within the annual report.

2029 (Year 5): Review, update and develop appropriate issues to be included in the public service announcements. Provide/Place/Broadcast at least **five** announcements throughout the year. Provide the number of announcements and locations within the annual report.

Responsible Party:

Public Works

1.1 Public Involvement / Participation

The Public Involvement/Participation minimum measure consists of Best Management Practices (BMPs) that focus on involving the local public in development and implementation of the SWMP. Compliance with State, Tribal, and local public notice requirements will facilitate involvement of the public in development, submittal (NOI and SWMP), and implementation of the public involvement/participation program. The BMPs describe the plan to actively involve the public in development and implementation of the SWMP and the types of public involvement activities included in the program. The target audiences for the public involvement program are all groups that may have an interest in the particular BMPs in addition to all ethnic and economic groups and the general public located within the permitted boundary. Evaluation of the success of this minimum measure will be through careful analysis of the measurable goals for each BMP included in this minimum measure. Measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. The responsibility for implementation of this minimum measure is described with each BMP procedure.

Best Management Practices:

1. **(PI-1) Stream/lake or watershed clean-up events; litter/trash clean-up events:** Host or support at least one event where the land area cleaned is a minimum of two acres, 400 yards of stream bank cleaned and/or two miles of roadside cleaned.

Implementation Tasks:

1. Annually participate/host in the Trash Bash Event
2. Annually participate/host in Keep Texas Beautiful Fall Sweep Event
3. Provide necessary support to the volunteer groups for cleaning and/or maintenance events, e.g. traffic control, safety equipment, trash bags, landfill access and/or bulk litter pickup.

Measurable Goals:

2025 (Year 1): Provide the number of events held, number of volunteers and location of event within annual report.

2026 (Year 2): Provide the number of events held, number of volunteers and location of event within annual report.

2027 (Year 3): Provide the number of events held, number of volunteers and location of event within annual report.

2028 (Year 4): Provide the number of events held, number of volunteers and location of event within annual report.

2029 (Year 5): Provide the number of events held, number of volunteers and location of event within annual report.

Responsible Party:

Public Works

2. (PI-2) Habitat improvement; Tree planting; Invasive vegetation removal; Stream restoration.

Implementation Tasks:

1. Host or support at least one event annually

2. An event must be a minimum of 0.5 acres or 25 yards and take place within parks, green spaces, streams or adjacent to a public waterway.

3. An event may be a combination of locations and areas.

Measurable Goals:

2025 (Year 1): Host at least one event annually and provide details of the event, pictures from the event, and any data on attendance within the annual report.

2026 (Year 2): Host at least one event annually and provide details of the event, pictures from the event, and any data on attendance within the annual report.

2027 (Year 3): Host at least one event annually and provide details of the event, pictures from the event, and any data on attendance within the annual report.

2028 (Year 4): Host at least one event annually and provide details of the event, pictures from the event, and any data on attendance within the annual report.

2029 (Year 5): Host at least one event annually and provide details of the event, pictures from the event, and any data on attendance within the annual report.

Responsible Party:

Public Works

3. (PI-3) Educational display/booth at a school, public event, or similar events to provide information or displays that work to improve public understanding of issues related to water quality.

Implementation Tasks:

1. Provide or support one booth or display at a minimum annually.

2. The booth or display must be staffed during the time which the event is open to the public.

Measurable Goals:

2025 (Year 1): Provide or support one booth with staff and educational materials to at least **50** members of the public. Provide material used and number of people reached within the annual report.

2026 (Year 2): Provide or support one booth with staff and educational materials to at least **50** members of the public. Provide material used and number of people reached within the annual report.

2027 (Year 3): Provide or support one booth with staff and educational materials to at least **50**

- members of the public. Provide material used and number of people reached within the annual report.
- 2028 (Year 4): Provide or support one booth with staff and educational materials to at least **50** members of the public. Provide material used and number of people reached within the annual report.
- 2029 (Year 5): Provide or support one booth with staff and educational materials to at least **50** members of the public. Provide material used and number of people reached within the annual report.

Responsible Party:

Public Works

2.0 Illicit Discharge Detection and Elimination

The Illicit Discharge Detection and Elimination minimum measure consists of Best Management Practices (BMPs) that focus on the detection and elimination of illicit discharges into the MS4. A storm sewer system map showing the location of all outfalls and the names and location of all receiving waters will be developed from existing mapping information, e.g. MS4 CAD or GIS map bases or the US Census Bureau Tiger/Line 2000 maps. The BMPs describe map update procedures; the legal authority mechanism (to the extent allowable under State, Tribal or local law) which will be used to effectively prohibit illicit discharges; enforcement procedures and actions to ensure that the regulatory mechanism is implemented; the dry weather screening program and procedures for tracing and locating the source of an illicit discharge; procedures for locating priority areas; and procedures for removing the source of the illicit discharge. Evaluation of the success of this minimum measure will be through careful analysis of the measurable goals for each BMP included in this minimum measure. Measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. The responsibility for implementation of this minimum measure is described with each BMP procedure.

Outfall inspections and public reporting will be key in locating and tracing illicit discharges and illegal dumping using visual, odor and chemical analysis of dry weather discharges upstream to the source. Investigations shall begin immediately once a complaint is received of a potential illicit discharge. For identified illicit discharges, ordinance enforcement will be the backbone of removing the discharge. If the discharge is an immediate threat to human health and safety or the environment the utilities shall be shut off and TCEQ **immediately** notified.

Best Management Practices:

1. (ID-1) Maintain a current and accurate MS4 map, which must be located on site and available for review by TCEQ. The map must show at a minimum the following information:
 - a. The location of all small MS4 outfalls that are operated by the permittee and that discharge into Waters of the U.S.,
 - b. The location and name of all surface waters receiving discharges from the small MS4 outfalls

Implementation Tasks:

1. Update the developed map of the MS4 system.

Measurable Goals:

- 2025 (Year 1): Review and update, as necessary, at least once annually to include features which have been added, removed or changed within the annual report.
- 2026 (Year 2): Review and update, as necessary, at least once annually to include features which

- have been added, removed or changed within the annual report.
- 2027 (Year 3): Review and update, as necessary, at least once annually to include features which have been added, removed or changed within the annual report.
- 2028 (Year 4): Review and update, as necessary, at least once annually to include features which have been added, removed or changed within the annual report.
- 2029 (Year 5): Review and update, as necessary, at least once annually to include features which have been added, removed or changed within the annual report.

Responsible Party:

Public Works Department and GIS

2. (ID-2) Conduct training for all the permittee's field staff that may come into contact with or otherwise observe an illicit discharge, illegal dumping, or illicit connection to the small MS4 as part of their normal job responsibilities. Training program materials and attendance lists must be maintained onsite and made available for review by the TCEQ.

Implementation Tasks:

1. Collect training materials for annual training.
2. Create a list of all employees to be trained annually.

Measurable Goals:

- 2025 (Year 1): Conduct a minimum of one training annually for 100% of MS4 field staff that may encounter or otherwise observe an illicit discharge, illegal dumping, or illicit connection to the small MS4 as part of their normal job responsibilities. Provide training materials and a sign-in sheet of trained personnel.
- 2026 (Year 2): Conduct a minimum of one training annually for 100% of MS4 field staff that may encounter or otherwise observe an illicit discharge, illegal dumping, or illicit connection to the small MS4 as part of their normal job responsibilities. Provide training materials and a sign-in sheet of trained personnel.
- 2027 (Year 3): Conduct a minimum of one training annually for 100% of MS4 field staff that may encounter or otherwise observe an illicit discharge, illegal dumping, or illicit connection to the small MS4 as part of their normal job responsibilities. Provide training materials and a sign-in sheet of trained personnel.
- 2028 (Year 4): Conduct a minimum of one training annually for 100% of MS4 field staff that may encounter or otherwise observe an illicit discharge, illegal dumping, or illicit connection to the small MS4 as part of their normal job responsibilities. Provide training materials and a sign-in sheet of trained personnel.
- 2029 (Year 5): Conduct a minimum of one training annually for 100% of MS4 field staff that may encounter or otherwise observe an illicit discharge, illegal dumping, or illicit connection to the small MS4 as part of their normal job responsibilities. Provide training materials and a sign-in sheet of trained personnel.

Responsible Party:

Public Works (special note: can be one of the safety meetings held by Jeremy)

3. (ID-3) MS4 Outfall Screening: Conduct systematic inspection of outfalls in the MS4 in order to identify the presence of illicit discharges.

Implementation Tasks:

1. Review and modify, if needed, the outfall screening forms and procedures for record keeping and data entry into MS4 outfall screening databases.
2. Train personnel in field analytical techniques necessary for the identification of illicit discharges.
3. Continue to track locations of illicit discharges upon identification.
4. Develop/Update a schedule that allows for the screening of the entire MS4 system within the permit term. (Typically, the schedule will require 20% of the total number of outfalls to be completed annually in order to achieve 100% completion over a 5 year permit term.)
5. Conduct outfall screening efforts according to the developed schedule.
6. Investigate outfall drainage systems that are identified as having non-storm water discharges from the MS4 and eliminate illicit discharges according to local storm water regulations.
7. Maintain records of outfall screening and investigations for each outfall and any elimination activities.

Measurable Goals:

- 2025 (Year 1): Complete screening of **20%** of the storm water outfalls that discharge to the MS4 in accordance with the identified schedule. Provide number of outfalls inspected and results within the annual report.
- 2026 (Year 2): Complete screening of **40%** of the storm water outfalls that discharge to the MS4 in accordance with the identified schedule. Provide number of outfalls inspected and results within the annual report.
- 2027 (Year 3): Complete screening of **60%** of the storm water outfalls that discharge to the MS4 in accordance with the identified schedule. Provide number of outfalls inspected and results within the annual report.
- 2028 (Year 4): Complete screening of **80%** of the storm water outfalls that discharge to the MS4 in accordance with the identified schedule. Provide number of outfalls inspected and results within the annual report.
- 2029 (Year 5): Complete screening of **100%** of the storm water outfalls that discharge to the MS4 in accordance with the identified schedule. Provide number of outfalls inspected and results within the annual report.

Responsible Party:

Public Works

4. (ID-4) Maintain and publicize a public reporting method for the public to report illicit discharges, illegal dumping, or water quality impacts associated with discharges into or from the small MS4 such as a reporting hotline, online form, or other similar mechanism. A central contact point shall be provided to receive the reports.

Implementation Tasks:

1. Create/update one public reporting mechanism
2. Publicize the reporting mechanism a minimum of two times annual in a method designed to reach the majority of the intended audience.
3. Develop and implement a tracking system to estimate what percentage of the intended

- audience is reached for determining BMP effectiveness.
4. The reporting mechanism must be publicized on the public website.

Measurable Goals:

- 2025 (Year 1): Create the public reporting mechanism, link on City website to the mechanism and point of contact for receiving reports; provide documentation within the annual report.
- 2026 (Year 2): Review/update the public reporting mechanism, link on City website and point of contact. Publicize the reporting mechanism via utility bill message and Social Media twice a year; provide documentation within the annual report.
- 2027 (Year 3): Review/update the public reporting mechanism, link on City website and point of contact. Publicize the reporting mechanism via utility bill message and Social Media twice a year; provide documentation within the annual report.
- 2028 (Year 4): Review/update the public reporting mechanism, link on City website and point of contact. Publicize the reporting mechanism via utility bill message and Social Media twice a year; provide documentation within the annual report.
- 2029 (Year 5): Review/update the public reporting mechanism, link on City website and point of contact. Publicize the reporting mechanism via utility bill message and Social Media twice a year; provide documentation within the annual report.

Responsible Party:

Public Works and Public Affairs

5. (ID-5) Develop and maintain procedures for responding to illicit discharges, illegal dumping, and spills

Implementation Tasks:

1. Develop and maintain illicit discharge, dumping and spill procedures

Measurable Goals:

- 2025 (Year 1): Start developing procedures for responding to illicit discharges, dumping and spills. Provide draft of them within the annual report.
- 2026(Year 2): Finish developing procedures for responding to illicit discharges, dumping and spills. Provide finish document within annual report.
- 2027 (Year 3): Review/update procedures for responding to illicit discharges, dumping and spills. Provide document within annual report and list/highlight locations of any updates/changes.
- 2028 (Year 4): Review/update procedures for responding to illicit discharges, dumping and spills. Provide document within annual report and list/highlight locations of any updates/changes.
- 2029 (Year 5): Review/update procedures for responding to illicit discharges, dumping and spills. Provide document within annual report and list/highlight locations of any updates/changes.

Responsible Party:

Public Works

5. (ID-6) Source investigation and elimination of illicit discharges and illegal dumping by following:

- a. Minimum investigation requirements – upon becoming aware of an illicit discharge an investigation to identify and locate the source of illicit discharge must occur as soon as practicable by:
 - i. Prioritizing the investigation based on their relative risk of pollution.
 - ii. Reporting to TCEQ immediately upon becoming aware of the illicit discharge if believed to be an immediate threat to human health or the environment.
 - iii. Tracking all investigations and documenting the date(s) of the illicit discharge; the results of the investigation; any follow-up of the investigations and the date the investigation was closed.

Implementation Tasks:

1. Respond to 100% of known illicit discharges and illegal dumping incidents each year to investigate sources and eliminate.
2. Respond to 100% of high priority discharges each year such as sanitary sewer discharges within 24 hours.
3. Report to TCEQ and adjacent MS4 operator 100% of known illicit discharge incident where the MS4 does not have jurisdiction.
4. Report to TCEQ immediately if illicit flows are believed to be an immediate threat to human health or the environment.

Measurable Goals:

- 2025 (Year 1): Respond to 100% of known illicit discharges and dumping incidents each year and provide investigation(s) within annual report.
- 2026 (Year 2): Respond to 100% of known illicit discharges and dumping incidents each year and provide investigation(s) within annual report.
- 2027 (Year 3): Respond to 100% of known illicit discharges and dumping incidents each year and provide investigation(s) within annual report.
- 2028 (Year 4): Respond to 100% of known illicit discharges and dumping incidents each year and provide investigation(s) within annual report.
- 2029 (Year 5): Respond to 100% of known illicit discharges and dumping incidents each year and provide investigation(s) within annual report.

Responsible Party:

Public Works and Building Department (Code Enforcement)

3.0 Construction Site Storm Water Runoff Control

The Construction Site Runoff minimum measure consists of Best Management Practices (BMP's) that focus on the reduction of pollutants in any storm water runoff to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of storm water discharges from construction activity disturbing less than one acre will be considered if it is part of a larger common plan of development or sale that would disturb one acre or more. The BMPs describe the legal authority mechanism (to the extent allowable under State, Tribal or local law) which will be used to require erosion and sediment controls; enforcement procedures and actions to ensure compliance; requirements for construction site operators to implement appropriate erosion and sediment control BMPs; requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter and sanitary waste at the construction site; procedures for site plan review which incorporate the consideration of potential water quality impacts; procedures for receipt and consideration of information submitted by the public; and procedures for site inspection and enforcement of control measures. Evaluation of the success of this minimum measure will be through careful analysis

of the measurable goals for each BMP included in this minimum measure. Measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. The responsibility for implementation of this minimum measure is described with each BMP procedure.

Best Management Practices:

1. **(CS-1) Construction Legal Authority:** Develop/Update adequate legal authority to regulate local construction site runoff through construction permitting programs.

Implementation Tasks:

1. Review/Modify guidelines and regulatory issues necessary to control storm water runoff from construction sites under the following: - Require SWP3 for Construction Activities- Temporary erosion control measures- Control of other construction wastes- Operation and general prohibitions- Final stabilization of the site- Local permitting requirements- Record keeping and locally required submissions
2. Review/Modify supplemental legal authority, through ordinance, order, or other policy related powers, to regulate construction site runoff.
3. Provide notification to the local construction community of the updated local construction storm water regulations.
4. Enforce the regulations as appropriate to regulate storm water discharges from local construction sites.

Measurable Goals:

- 2025 (Year 1): Review **100%** of the supplemental legal authority, through ordinance, order, or other policy related powers, to regulate construction site runoff. Enforce **100%** of the existing regulations to regulate storm water discharges. Provide number of enforcement actions taken within the annual report.
- 2026 (Year 2): Update (as applicable) **100%** of the legal authority to regulate construction site runoff. Enforce **100%** of the regulations. Provide all updates to regulations and number of enforcement actions taken within the annual report.
- 2027 (Year 3): Update (as applicable) **100%** of the legal authority to regulate construction site runoff. Enforce **100%** of the regulations. Provide all updates to regulations and number of enforcement actions taken within the annual report.
- 2028 (Year 4): Update (as applicable) **100%** of the legal authority to regulate construction site runoff. Enforce **100%** of the regulations. Provide all updates to regulations and number of enforcement actions taken within the annual report.
- 2029 (Year 5): Update (as applicable) **100%** of the legal authority to regulate construction site runoff. Enforce **100%** of the regulations. Provide all updates to regulations and number of enforcement actions taken within the annual report.

Responsible Party:

Building Department and Public Works

3. **(CS-2) Construction Inspection Procedures:** Develop/Update inspection procedures and educate the local construction community on local storm water regulations related to construction activities.

Implementation Tasks:

1. Notify contractors of the need for use of temporary erosion controls- Control of other construction related wastes- Operational and general prohibitions- Site closure and stabilization requirements- On-site documentation and records- Enforcement actions and on-site communication issues
2. Review/Modify inspection forms and procedures necessary to inspect local construction sites in order to ensure compliance with local construction storm water regulations.
3. Provide notification to the local construction community of the updated inspection procedures.

Measurable Goals:

- 2025 (Year 1): Review/Update **100%** of the inspection forms and procedures ensuring local regulation are addressed. Inform and receive comments from **50%** of the local construction community on any updates to procedures. Consider the effect of the comments and make changes as needed for the next permit year. Provide copy of inspection form and updated procedures within the annual report.
- 2026 (Year 2): Review/Update **100%** of the inspection forms and procedures ensuring local regulation are addressed. Inform and receive comments from **50%** of the local construction community on any updates to procedures. Consider the effect of the comments and make changes as needed for the next permit year. Provide copy of inspection form and updated procedures within the annual report.
- 2027 (Year 3): Review/Update **100%** of the inspection forms and procedures ensuring local regulation are addressed. Inform and receive comments from **50%** of the local construction community of any updates to procedures. Consider the effect of the comments and make changes as needed for the next permit year. Provide copy of inspection form and updated procedures within the annual report.
- 2028 (Year 4): Review/Update **100%** of the inspection forms and procedures ensuring local regulation are addressed. Inform and receive comments from **50%** of the local construction community of any updates to procedures. Consider the effect of the comments and make changes as needed for the next permit year. Provide copy of inspection form and updated procedures within the annual report.
- 2029 (Year 5): Review/Update **100%** of the inspection forms and procedures ensuring local regulation are addressed. Inform and receive comments from **50%** of the local construction community any updates to procedures. Consider the effect of the comments and make changes as needed the next permit year. Provide copy of inspection form and updated procedures within the annual report.

Responsible Party:

Building Department

3. (CS-3) Construction Plans Review: Implement a construction plans review process that focuses on compliance with local construction storm water regulations.

Implementation Tasks:

1. Review/Develop/Update a process to obtain construction plans for review to determine compliance with local construction storm water regulations.
2. Develop/Update internal tracking and plan review procedures to cover the following issues:- Conformance to local storm water regulations- Appropriate use of temporary erosion controls- Inclusion of any required local, state, and/or federal storm water permit documents

3. Educate the local construction community (contractors, developers, engineers, architects) on the construction plans review process.
4. Implement the construction plans review procedures for local construction sites.
5. Notify the owners of construction plans when deficiencies are found in the plans during the review process.
6. Maintain records of plans reviewed and approved for construction under this program.

Measurable Goals:

- 2025 (Year 1): Review/Update process to obtain construction plans for review to determine compliance with local construction storm water regulations. Educate **100%** of the local construction community of changes to the review process. Enforce **100%** of the plan review process. Provide samples of the plans reviewed with the annual report.
- 2026 (Year 2): Review/Update process to obtain construction plans for review to determine compliance with local construction storm water regulations. Educate **100%** of the local construction community of changes to the review process. Enforce **100%** of the plan review process. Provide samples of the plans reviewed with the annual report.
- 2027 (Year 3): Review/Update process to obtain construction plans for review to determine compliance with local construction storm water regulations. Educate **100%** of the local construction community of changes to the review process. Enforce **100%** of the plan review process. Provide samples of the plans reviewed with the annual report.
- 2028 (Year 4): Review/Update process to obtain construction plans for review to determine compliance with local construction storm water regulations. Educate **100%** of the local construction community of changes to the review process. Enforce **100%** of the plan review process. Provide samples of the plans reviewed with the annual report.
- 2029 (Year 5): Review/Update process to obtain construction plans for review to determine compliance with local construction storm water regulations. Educate **100%** of the local construction community of changes to the review process. Enforce **100%** of the plan review process. Provide samples of the plans reviewed with the annual report.

Responsible Party:

Building Department and Public Works

4. **(CS-4) Construction Site Inspection:** Conduct inspections of local construction sites that discharge storm water to the MS4 to determine compliance with local construction storm water regulations.

Implementation Tasks:

1. Develop/Update internal procedures for tracking new and on-going construction activities.
2. Train permittee inspection personnel on local construction storm water regulations and inspection procedures.
3. Inspect qualifying construction sites using appropriate inspection procedures and forms to ensure compliance with local storm water regulations.

4. Issue enforcement actions to owners and operators of local construction sites that are not in compliance with local construction storm water regulations.

5. Maintain records of construction site inspections, enforcement actions, and corrective actions performed by local construction site owners and operators.

Measurable Goals:

2025 (Year 1): Train **100%** of inspection personnel on storm water regulations. Inspect **100%** of qualifying construction sites for compliance with storm water regulations. Issue enforcement actions to **100%** of owners and operators of local construction sites that do not comply with the storm water regulations. Provide inspection training sign-in sheet and the number of enforcement actions within the annual report.

2026 (Year 2): Train **100%** of inspection personnel on storm water regulations. Inspect **100%** of qualifying construction sites for compliance with storm water regulations. Issue enforcement actions to **100%** of owners and operators of local construction sites that do not comply with the storm water regulations. Provide inspection training sign-in sheet and the number of enforcement actions within the annual report.

2027 (Year 3): Train **100%** of inspection personnel on storm water regulations. Inspect **100%** of qualifying construction sites for compliance with storm water regulations. Issue enforcement actions to **100%** of owners and operators of local construction sites that do not comply with the storm water regulations. Provide inspection training sign-in sheet and the number of enforcement actions within the annual report.

2028 (Year 4): Train **100%** of inspection personnel on storm water regulations. Inspect **100%** of qualifying construction sites for compliance with storm water regulations. Issue enforcement actions to **100%** of owners and operators of local construction sites that do not comply with the storm water regulations. Provide inspection training sign-in sheet and the number of enforcement actions within the annual report.

2029 (Year 5): Train **100%** of inspection personnel on storm water regulations. Inspect **100%** of qualifying construction sites for compliance with storm water regulations. Issue enforcement actions to **100%** of owners and operators of local construction sites that do not comply with the storm water regulations. Provide inspection training sign-in sheet and the number of enforcement actions within the annual report.

Responsible Party:

Building Department and Public Works

5. **(CS-5) Prohibited Discharges - Maintain the following discharges are prohibited:**

a. Wastewater from washout of concrete and wastewater from water well drilling operations, unless managed by an appropriate control;

b. Wastewater from washout and cleanout of stucco, paint, from release oils, and other construction materials;

c. Fuels, oils, or other pollutants used in vehicle and equipment operation and maintenance; and,

d. Soaps or solvents used in vehicle and equipment washing;

e. Discharges from dewatering activities, including discharges from dewatering of trenches and excavations, unless managed by appropriate BMPs.

Implementation Tasks:

1. Monitor wastewater from washout of concrete and wastewater from water well drilling operations, unless managed by an appropriate control.
2. Monitor wastewater from washout and cleanout from stucco, paint, from release oils, and other construction materials.
3. Monitor wastewater from fuels, oils, or other pollutants used in vehicle and equipment operation and maintenance.
4. Monitor wastewater from soaps or solvents in vehicle and equipment washing.
5. Monitor wastewater from dewatering activities, including discharges from dewatering of trenches and excavations, unless managed by appropriate BMP's.

Measurable Goals:

- 2025 (Year 1): Issue enforcement actions to **100%** of owners and operators of local construction sites that do not comply with local construction storm water regulations. Provide number of enforcement actions within the annual report.
- 2026 (Year 2): Issue enforcement actions to **100%** of owners and operators of local construction sites that do not comply with local construction storm water regulations. Provide number of enforcement actions within the annual report.
- 2027 (Year 3): Issue enforcement actions to **100%** of owners and operators of local construction sites that do not comply with local construction storm water regulations. Provide number of enforcement actions within the annual report.
- 2028 (Year 4): Issue enforcement actions to **100%** of owners and operators of local construction sites that do not comply with local construction storm water regulations. Provide number of enforcement actions within the annual report.
- 2029 (Year 5): Issue enforcement actions to **100%** of owners and operators of local construction sites that do not comply with local construction storm water regulations. Provide number of enforcement actions within the annual report.

Responsible Party:

Building Department and Public Works

4.0 Post-Construction Storm Water Management in New Development and Redevelopment

The Post-Construction Storm Water Management minimum measure consists of Best Management Practices (BMP's) that focus on the prevention or minimization of water quality impacts from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale that discharge into the small MS4. The BMPs describe structural and/or non-structural practices; the legal authority mechanism (to the extent allowable under State, Tribal or local law) which will be used to address post-construction runoff from new development and redevelopment projects; and procedures to ensure long term operation and maintenance of BMPs. BMPs focusing on education programs for developers and the general public with regard to project designs that minimize water quality impacts are described in the Public Education minimum measure. Evaluation of the success of this minimum measure will be through careful analysis of the measurable goals for each BMP included in this minimum measure. Measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. The responsibility for implementation of this minimum measure is described with each BMP procedure.

Long-term operation and maintenance of measures shall be provided by the City for public infrastructure and by Private Developer's licensed/certified representatives on private facilities.

Best Management Practices:

1. **(PC-1) Post-Construction Runoff Legal Authority:** Review/Develop/Update adequate legal authority to require post-construction control measures and maintenance of post-construction control measures in areas of new and redevelopment.

Implementation Tasks:

1. Research existing legal authority available to regulate post-construction runoff.
2. If necessary, Develop/Update supplemental legal authority through ordinance, order, or other policy related legal powers to regulate post-construction runoff.
3. Develop/Update draft regulations and educational materials necessary to inform the local development community (developers, designers, engineers, architects) of the proposed local post-construction runoff regulations.
4. Formally adopt the final post-construction runoff regulations in accordance with all applicable public notification regulations.
5. Provide sufficient notification of the adopted post-construction runoff regulations to the local development community.
6. Enforce the post-construction runoff regulations as appropriate to regulate runoff from new and re-development projects.

Measurable Goals:

- 2025 (Year 1): Develop/Review/Update stormwater quality guidelines and regulations for post-development stormwater quality. Educate **100%** of new development personnel of the regulations and enforce **100%** of the regulations. Provide plan samples showing post-construction measures within the annual report.
- 2026 (Year 2): Develop/Review/Update stormwater quality guidelines and regulations for post-development stormwater quality. Educate **100%** of new development personnel of the regulations and enforce **100%** of the regulations. Provide plan samples showing post-construction measures within the annual report.
- 2027 (Year 3): Develop/Review/Update stormwater quality guidelines and regulations for post-development stormwater quality. Educate **100%** of new development personnel of the regulations and enforce **100%** of the regulations. Provide plan samples showing post-construction measures within the annual report.
- 2028 (Year 4): Develop/Review/Update stormwater quality guidelines and regulations for post-development stormwater quality. Educate **100%** of new development personnel of the regulations and enforce **100%** of the regulations. Provide plan samples showing post-construction measures within the annual report.
- 2029 (Year 5): Develop/Review/Update stormwater quality guidelines and regulations for post-development stormwater quality. Educate **100%** of new development personnel of the regulations and enforce **100%** of the regulations. Provide plan samples showing post-construction measures within the annual report.

Responsible Party:

Public Works and Building Department

2. **(PC-2) New Development and Re-development Plans Review:** Systematically review development and re-development plans to ensure compliance with local post-construction runoff regulations

Implementation Tasks:

1. Develop/Update a process to obtain development construction plans for review to determine compliance with local post-construction runoff regulations.
2. Develop/Update internal tracking and plan review procedures to ensure developer feedback and developer appeal.
3. Educate the local development community on the local development plans review process.
4. Implement the development plans review process.
5. Notify developers when revisions are made in the plan review process.
6. Maintain records of development plans reviewed and actions taken under this program.

Measurable Goals:

- 2025 (Year 1): Develop/Review/Update tracking and plan review procedures to ensure **100%** of new or applicable redevelopment projects meet the regulations. Provide sample of projects tracked and the plans within the annual report.
- 2026 (Year 2): Develop/Review/Update tracking and plan review procedures to ensure **100%** of new or applicable redevelopment projects meet the regulations. Provide sample of projects tracked and the plans within the annual report.
- 2027 (Year 3): Develop/Review/Update tracking and plan review procedures to ensure **100%** of new or applicable redevelopment projects meet the regulations. Provide sample of projects tracked and the plans within the annual report.
- 2028 (Year 4): Develop/Review/Update tracking and plan review procedures to ensure **100%** of new or applicable redevelopment projects meet the regulations. Provide sample of projects tracked and the plans within the annual report.
- 2029 (Year 5): Develop/Review/Update tracking and plan review procedures to ensure **100%** of new or applicable redevelopment projects meet the regulations. Provide sample of projects tracked and the plans within the annual report.

Responsible Party:

Public Works and Building Department

3. **(PC-3) Development Project Inspection Procedures:** Develop/Update inspection forms and procedures for new development and re-development project inspections based on the local post-construction runoff regulations.

Implementation Tasks:

1. Develop/Update a list of items to incorporate in the inspection of development and re-development project sites.
2. Develop/Update draft inspection forms and procedures necessary to inspect local new and

re-development projects in order to ensure compliance with local post-construction runoff regulations and approved plans.

3. Produce the final version of the local development project inspection forms and procedures.
4. Provide appropriate notification to the local development community on the final inspection forms and procedures.

Measurable Goals:

- 2025 (Year 1): Develop/Review/Update draft inspection forms and procedures necessary to inspect **100%** local new and re-development projects in order to ensure compliance with post-construction runoff regulations and approved plans. Provide sample of forms within the annual report.
- 2026 (Year 2): Develop/Review/Update draft inspection forms and procedures necessary to inspect **100%** local new and re-development projects in order to ensure compliance with post-construction runoff regulations and approved plans. Provide sample of forms within the annual report.
- 2027 (Year 3): Develop/Review/Update draft inspection forms and procedures necessary to inspect **100%** local new and re-development projects in order to ensure compliance with post-construction runoff regulations and approved plans. Provide sample of forms within the annual report.
- 2028 (Year 4): Develop/Review/Update draft inspection forms and procedures necessary to inspect **100%** local new and re-development projects in order to ensure compliance with post-construction runoff regulations and approved plans. Provide sample of forms within the annual report.
- 2029 (Year 5): Develop/Review/Update draft inspection forms and procedures necessary to inspect **100%** local new and re-development projects in order to ensure compliance with post-construction runoff regulations and approved plans. Provide sample of forms within the annual report.

Responsible Party:

Public Works and Building Department

4. **(PC-4) New Development and Re-development Project Inspection:** Inspect local new development and re-development projects to ensure conformance to approved plans and local post-construction runoff regulations.

Implementation Tasks:

1. Develop/Update internal tracking procedures for tracking development projects that are under construction and that have been completed.
2. Train inspection personnel on local post-construction runoff regulations and final inspection procedures.
3. Inspect qualifying development project sites using adopted inspection forms and procedures to ensure conformance with local post-construction runoff regulations.
4. Issue enforcement actions to owners or operators of local development projects that are not in compliance with local post-construction runoff regulations.
5. Maintain records of development project site inspections, enforcement actions, and corrective

actions performed by local development project owners.

Measurable Goals:

- 2025 (Year 1): Develop/Review/Update list of local development projects that qualify for inspection under post-construction runoff regulations. Inspect **100%** of the project sites and issue enforcement actions of violators. Provide samples of inspections within the annual report.
- 2026 (Year 2): Develop/Review/Update list of local development projects that qualify for inspection under post-construction runoff regulations. Inspect **100%** of the project sites and issue enforcement actions of violators. Provide samples of inspections within the annual report.
- 2027 (Year 3): Develop/Review/Update list of local development projects that qualify for inspection under post-construction runoff regulations. Inspect **100%** of the project sites and issue enforcement actions of violators. Provide samples of inspections within the annual report.
- 2028 (Year 4): Develop/Review/Update list of local development projects that qualify for inspection under post-construction runoff regulations. Inspect **100%** of the project sites and issue enforcement actions of violators. Provide samples of inspections within the annual report.
- 2029 (Year 5): Develop/Review/Update list of local development projects that qualify for inspection under post-construction runoff regulations. Inspect **100%** of the project sites and issue enforcement actions of violators. Provide samples of inspections within the annual report.

Responsible Party:

Building Department and Public Works

5.0 Pollution Prevention and Good Housekeeping for Municipal Operations

The Pollution Prevention / Good Housekeeping minimum measure consists of Best Management Practices (BMP's) that focus on training and on the prevention or reduction of pollutant runoff from municipal operations. The BMPs describe the use of available training materials available from the EPA, your State, Tribe or other organizations; specific municipal operations that are impacted by the proposed operation and maintenance programs (BMPs); a list of municipally-owned industrial facilities which require other storm water discharge permits; maintenance activities, schedules and long term inspection procedures for controls to reduce floatables and other pollutants; controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, waste transfer stations fleet or maintenance shops with outdoor storage areas, and salt/sand storage locations and snow disposal areas; procedures for the proper disposal of waste removed from the MS4 and municipal operations, including dredge spoil, accumulated sediments, floatables and other debris; and procedures to ensure that new flood management projects are assessed for impacts on water quality and existing projects are assessed for incorporation of additional water quality protection devices or practices. Evaluation of the success of this minimum measure will be through careful analysis of the measurable goals for each BMP included in this minimum measure. Measurable goals for each BMP were selected by formulating attainable goals for the various BMP implementation steps or tasks. The responsibility for implementation of this minimum measure is described with each BMP procedure.

Best Management Practices:

1. **(GH-1) Permittee-owned Facilities and Control Inventory:** All permittees shall Develop/Update and maintain an inventory of facilities and stormwater controls that it owns and operates within the regulated area of the small MS4.

Implementation Tasks:

1. List inventory of permittee-owned facilities.
2. Prepare and adopt SWP3's for each facility required by permit from TCEQ.

Measurable Goals:

- 2025 (Year 1): Identify/Update list of **100%** of permittee-owned facilities and provide SWPPP for **100%** of facilities required by permit from TCEQ. Provide list and SWPPPs with annual report.
- 2026 (Year 2): Identify/Update list of **100%** of permittee-owned facilities and provide SWPPP for **100%** of facilities required by permit from TCEQ. Provide list and SWPPPs with annual report.
- 2027 (Year 3): Identify/Update list of **100%** of permittee-owned facilities and provide SWPPP for **100%** of facilities required by permit from TCEQ. Provide list and SWPPPs with annual report.
- 2028 (Year 4): Identify/Update list of **100%** of permittee-owned facilities and provide SWPPP for **100%** of facilities required by permit from TCEQ. Provide list and SWPPPs with annual report.
- 2029 (Year 5): Identify/Update list of **100%** of permittee-owned facilities and provide SWPPP for **100%** of facilities required by permit from TCEQ. Provide list and SWPPPs with annual report.

Responsible Party:

Public Works

2. **(GH-2) Training and Education:** All permittees shall inform or train appropriate employees involved in implementing pollution prevention and good housekeeping practices. All permittees shall maintain a training attendance list for inspection by TCEQ when requested.

Implementation Tasks:

1. Inform or train appropriate employees involved in implementing pollution prevention and good housekeeping practices.
2. Maintain a training attendance list for inspection by TCEQ when requested.

Measurable Goals:

- 2025 (Year 1): Train **100%** of inspection personnel in implementing pollution prevention and good housekeeping practices. Provide sign-in sheet of personal in attendance with annual report.
- 2026 (Year 2): Train **100%** of inspection personnel in implementing pollution prevention and good housekeeping practices. Provide sign-in sheet of personal in attendance with annual report.
- 2027 (Year 3): Train **100%** of inspection personnel in implementing pollution prevention and good housekeeping practices. Provide sign-in sheet of personal in attendance with annual report.
- 2028 (Year 4): Train **100%** of inspection personnel in implementing pollution prevention and good housekeeping practices. Provide sign-in sheet of personal in attendance with annual report.
- 2029 (Year 5): Train **100%** of inspection personnel in implementing pollution prevention and good

housekeeping practices. Provide sign-in sheet of personal in attendance with annual report.

Responsible Party:

Public Works Department (special note: can be one of the safety meetings held by Jeremy)

3. (GH-3) Disposal of Waste Material

Implementation Tasks:

1. Disposal of Waste Material - Waste materials removed from the small MS4 must be disposed of in accordance with 30 TAC Chapters 330 or 335, as applicable.

Measurable Goals:

- 2025 (Year 1): Dispose **100%** of waste materials in accordance with 30 TAC Chapters 330 or 335, as applicable. Provide disposal records applicable to hazardous waste materials removed from MS4 system with annual report.
- 2026 (Year 2): Dispose **100%** of waste materials in accordance with 30 TAC Chapters 330 or 335, as applicable. Provide disposal records applicable to hazardous waste materials removed from MS4 system with annual report.
- 2027 (Year 3): Dispose **100%** of waste materials in accordance with 30 TAC Chapters 330 or 335, as applicable. Provide disposal records applicable to hazardous waste materials removed from MS4 system with annual report.
- 2028 (Year 4): Dispose **100%** of waste materials in accordance with 30 TAC Chapters 330 or 335, as applicable. Provide disposal records applicable to hazardous waste materials removed from MS4 system with annual report.
- 2029 (Year 5): Dispose **100%** of waste materials in accordance with 30 TAC Chapters 330 or 335, as applicable. Provide disposal records applicable to hazardous waste materials removed from MS4 system with annual report.

Responsible Party:

Public Works Department

4. (GH-4) Contractor Requirements and Oversight: Any contractors hired by the permittee to perform maintenance activities on permittee-owned facilities must be contractually required to comply with all of the storm water control measures, good housekeeping practices, and facility specific storm water management operating procedures described in Parts III B.5.(2)-(6). All permittees shall provide oversight of contractor activities to ensure that contractors are using appropriate control measures and SOPs. Oversight procedures must be developed before the end of the permit term and maintained on site and made available for inspection by TCEQ.

Implementation Tasks:

1. Any contractors hired by the permittee to perform maintenance activities on permittee-owned facilities must be contractually required to comply with all of the stormwater control measures, good housekeeping practices, and facility specific stormwater management operating procedures
2. All permittees shall provide oversight of contractor activities to ensure that contractors are using appropriate control measures and SOPs. Oversight procedures must be developed before the end of the permit term and maintained on site and made available for inspection by TCEQ.

Measurable Goals:

- 2025 (Year 1): Require **100%** of contractors at permittee-owned facilities to comply with all of the stormwater control measures, good housekeeping practices, and facility specific stormwater management operating procedures. Provide list of MS4 contractors and compliance records with annual report.
- 2026 (Year 2): Require **100%** of contractors at permittee-owned facilities to comply with all of the stormwater control measures, good housekeeping practices, and facility specific stormwater management operating procedures. Provide list of MS4 contractors and compliance records with annual report.
- 2027 (Year 3): Require **100%** of contractors at permittee-owned facilities to comply with all of the stormwater control measures, good housekeeping practices, and facility specific stormwater management operating procedures. Provide list of MS4 contractors and compliance records with annual report.
- 2028 (Year 4): Require **100%** of contractors at permittee-owned facilities to comply with all of the stormwater control measures, good housekeeping practices, and facility specific stormwater management operating procedures. Provide list of MS4 contractors and compliance records with annual report.
- 2029 (Year 5): Require **100%** of contractors at permittee-owned facilities to comply with all of the stormwater control measures, good housekeeping practices, and facility specific stormwater management operating procedures. Provide list of MS4 contractors and compliance records with annual report.

Responsible Party:

Public Works Department

5. **(GH-5) Municipal Operation and Maintenance Activities:** Assessment of permittee-owned operations. All permittees shall evaluate operation and maintenance (O&M) activities for their potential to discharge pollutants into stormwater, including but not limited to:

Implementation Tasks:

1. Road and parking lot maintenance may include such areas as pothole repair, pavement marking, sealing, and re-paving.
2. Right-of-way maintenance, including mowing, herbicide and pesticide application, and planting vegetation.
3. All permittees shall identify pollutants of concern that could be discharged from the above O&M activities (for example, metals; chlorides; hydrocarbons such as benzene, toluene, ethyl benzene, and xylenes; sediment; and trash).
4. Develop/Update and implement a set of pollution prevention measures that will reduce the discharge of pollutants in stormwater from the above activities. These pollution prevention measures will include replacing materials and chemicals with more environmentally benign materials or methods.
5. Inspect pollution prevention measures - All pollution prevention measures implemented at permittee-owned facilities must be visually inspected at a frequency determined by the permittee to ensure they are working properly. A log of inspections must be maintained and made available for review by the TCEQ upon request.

Measurable Goals:

- 2025 (Year 1): Assess **100%** of permittee-owned operations and evaluate operation and maintenance (O&M) activities. Provide assessments with annual report.
- 2026 (Year 2): Assess/Update **100%** of permittee-owned operations and evaluate operation and maintenance (O&M) activities. Provide assessments with annual report.
- 2027 (Year 3): Assess/Update **100%** of permittee-owned operations and evaluate operation and maintenance (O&M) activities. Provide assessments with annual report.
- 2028 (Year 4): Assess/Update **100%** of permittee-owned operations and evaluate operation and maintenance (O&M) activities. Provide assessments with annual report.
- 2029 (Year 5): Assess/Update **100%** of permittee-owned operations and evaluate operation and maintenance (O&M) activities. Provide assessments with annual report.

Responsible Party:

Public Works

ADDITIONAL DETAILS:

- **The City of Seabrook discharges into the following water segments: 2421OW (Upper Galveston Bay Oyster Waters), 2421 (Upper Galveston Bay), 2421A (Clear Lake Channel), 2425 (Clear Lake), 2425A (Taylor Lake), 2421C (Pine Gully).**
- **City must check annually if a waterbody was added to the EPA approved Texas Integrated Report of Surface Water quality for Clean Water Act Section 305(b) and 303(d).**
- **Six TMDLs for Bacteria in Waters of the Upper Gulf Coast was adopted August 2008 with latest revision in October 2018. Numerical Waste Load Allocations (WLA) are not listed for MS4s within the document. Table 12 on page 38 of the report states "Numerical concentrations requirements are unreasonable for storm water runoff. This TMDL will require MS4s to follow implementation of bacteria reduction efforts and best management practices."**