

Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number TXR040000

A. General Information

Authorization Number: TXR040385

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

Annual Reporting Year Option Selected by MS4:

Calendar Year: _____

Permit Year: _____

Fiscal Year: Fiscal Year Last day of fiscal year: (12/31/2024)

Reporting period beginning date: (month/date/year) 12/1/2024

Reporting period end date: (month/date/year) 12/31/2024

MS4 Operator Level: 2 Name of MS4: Texas Woman's University

Contact Name: Hope Zavalin Telephone Number: 940-898-3650

Mailing Address: 304 Administration Dr. Denton, TX 76209

E-mail Address: hzavalin@twu.edu

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

Region the annual report was submitted to: TCEQ Region 4

B. Status of Compliance with the MS4 GP and SWMP

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

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

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

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

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
1	Stormwater Management Program Web Site	Yes, provides a 24/7 resource for stormwater information to the university community.
1	Curb Inlet Markers	Yes, raises awareness generally and reminds those who might consider disposing of wastes in the storm system.
1/2/5	Employee Training	Yes, informs employees of the requirements of the SWMP and the importance of protecting stormwater.
1/2	Stormwater Hotline/Suggestion Numbers	Yes, provides point of contact if employees or students notice illicit discharge/dumping/spills/etc.
1	Encourage Participation in City of Denton Initiatives	Yes, encourages university community members to participate in City of Denton stormwater programs.
1/2	Campus event (such as Earth Day) to promote Stormwater awareness & Pollution Prevention Practices	Yes, educates TWU community members about the importance of protecting stormwater and provides point of contact if they notice illicit discharge/dumping/spills, etc.
2	MS4 Map Development	Yes, allows for determination of stormwater sources when conducting monthly inspections. Also, helps to determine if there are illicit connections.

2	Illicit Discharge Identification – On Campus	Yes, identifies improper stormwater discharges during EH&S compliance inspections and monthly stormwater inspections.
2	Illicit Discharge Identification – Off Campus	Yes, ensures sharing of information between the City of Denton stormwater program staff and TWU EH&S.
2	Illicit Discharge Notification /Enforcement	Yes, once an illicit discharge is discovered, it must be reported to the responsible party in order to identify corrective and preventative actions.
3/5	Contractor Requirements	Yes, contractual language lays out requirements related to stormwater protection/regulatory compliance for contractors working on the Denton campus. Also describes TWU requirements for contractors disturbing less than one acre.
3	Construction Site Inspections	Yes, regular inspections of construction sites by TWU staff and the City of Denton ensures that contractors are complying with applicable requirements.
3/4	Non-Conformance Notification/Enforcement	Yes, once an incident has occurred, it must be reported to the responsible party in order to identify corrective and preventative actions. Also helps with lessons learned.
3	SWPPP Development	Yes, specifying that SWPPPs are to be developed, and made available for TWU review, helps to ensure that that stormwater from construction projects is controlled appropriately.
4	Permit NOT Submittal	Yes, contractors are required to submit NOTs to TWU so EH&S staff are aware the cessation of large stormwater projects. Also provides a reminder that TWU has to take over management of stormwater controls at the end of the project.
4	Project Requirements	Yes, provides an opportunity to determine if appropriate structural controls are specified for the construction project.
4	New Structural Control Documentation	Yes, obtaining documentation of new structural controls that have been installed is critical to ensure that required maintenance is conducted by the TWU Facilities Management (FMC) department.

4	Landscaping/Tree Planting	Yes, planting of additional trees/vegetation and maintaining the existing plants reduces the volume of stormwater runoff, and reduces the potential for post-construction erosion.
5	SPCC Plan	Yes, SPCC plan implementation protects stormwater from contamination with oils and petroleum products.
5	Facilities and Control Inventory	Yes, allows for determination of stormwater sources when conducting monthly inspections and helps to determine if there are illicit connections.
5	Structural Control Maintenance	Yes, ensures that structural controls function as designed.
5	Grounds Maintenance	Yes, helps to prevent trash and vegetation debris across from impacting stormwater.
5	Disposal of Waste	Yes, proper profiling and disposal of all generated wastes ensures proper treatment and disposition off-site.
5	Visual Stormwater Contamination Assessment	Yes, monthly outdoor inspections identify potential stormwater issues, in addition to the construction site inspections and EH&S compliance inspections.
5	Contractor Oversight	Yes, oversight of all contractors working on campus (not just related to construction), ensures compliance with all applicable environmental regulations and TWU requirements.
5	Operation and Maintenance Activities Assessment	Yes, working with facilities and other TWU operations to ensure that pollutants of concern are controlled in the course of normal operations.

3. Describe progress towards achieving the goal of reducing the discharge of pollutants to the MEP. If no progress was made or the BMP did not result in a reduction in pollutants, provide an explanation. Use the table below to meet this requirement (**see Example 2 in instructions**):

MC M	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
1	Stormwater Management Program Web Site	Web sites	1	Web sites	No, not a direct reduction. However, educating the community will spread awareness and eventually reduce litter and pollutants.
1	Curb Inlet Markers	Institutional knowledge	~36	Curb Inlet Markers	Potentially yes, but raises awareness generally and reminds those who might consider disposing of wastes in the storm system. All inlets on campus were checked and markers replaced as needed.
1/2/ 5	Employee Training	Online and classroom training for the fiscal year; Bridge training platform implemented in 2021	25	Employees trained	No, but education of employees helps to communicate the rules at TWU, and the importance of protecting stormwater.

1	Encourage Participation in City of Denton Initiatives	City resources available for volunteering with Watershed Protection	Due to the short nature of this report, none occurred during this month.	Number of City programs advertised	No, but encourages university community members to participate in City of Denton stormwater programs, bringing awareness to the importance of keeping Stormwater pollutant-free.
1/2	Campus event (such as Earth Day) to promote Stormwater awareness & Pollution Prevention Practices	Educational materials on the importance of protecting stormwater & Hotline numbers	Due to the short nature of this report, none occurred during this month.	Number of campus events to promote stormwater awareness & illicit discharge reporting contacts.	No, but brings awareness to the importance of keeping Stormwater pollutant-free.
1	Stormwater Hotline Numbers	Hotline numbers	1	Stormwater Hotline Numbers	Yes, provides point of contact if employees or students notice illicit discharges/concerns that can be addressed immediately.

2	MS4 Map Development	Maps and Institutional Knowledge	1	Number of maps reviewed/updated	No, but allows for determination of Stormwater sources when conducting monthly inspections. Also, helps to determine if there are illicit connections.
2/5	Illicit Discharge Identification – On Campus	Stormwater Incident Log	0	Illicit Discharge	No, no Stormwater incidents/concerns were reported or observed by TWU employees apart from inspections. This is partly due to the short reporting period.
2	Illicit Discharge Identification – Off Campus	Inspections/Correspondence with City of Denton	0	Number of off-site discharges coming onto TWU property	No, as none identified this year.
2/3/4	Illicit Discharge Notification/Enforcement	Inspection Results	0	Illicit Discharges which responsible parties were presented with corrective and preventative actions	No, none identified this year.

3/5	Contractor Requirements	Contracts for construction projects	6	Stormwater-specific language included in contract language	Yes, contractual language outlines requirements related to Stormwater protection/regulatory compliance for contractors on the Denton campus. Also describes TWU requirements for contractors disturbing less than one acre.
2/3	Construction Site Inspections	Campus Optics Inspection Reports	12	Inspection Reports	Yes, 12 construction site inspections were conducted this year.
3	SWPPP Development	Plans	4	SWPPPs	Yes, 4 construction sites greater than 1 acre were present on campus this year.
4	Permit NOT Submittal	Permits	0	NOT Permits	No, but contractors are required to submit NOTs to TWU so EH&S staff are aware the cessation of permitted projects so that TWU can take over post construction controls as necessary. No NOT's were filed this year.

4	Project Requirements	Plans	100%	Plans reviewed	No, but provides an opportunity to determine if appropriate structural controls are specified for the construction project. Nothing greater than 1 acre was done, but other construction did occur that we review for Stormwater concerns and controls
4	New Structural Control Documentation	Plans	100%	Documents on structural control changes kept	No, but obtaining documentation of new structural controls that have been installed is critical to ensure that required maintenance is conducted by the TWU Facilities Management (FMC) department.

4	Landscaping/ Tree Planting	Programs	1	Programs in place	Yes, planting of additional trees/vegetation and maintaining the existing plants reduces the volume of stormwater runoff, provides a vegetative buffer, and reduces the potential for post- construction erosion.
5	SPCC Plan	Plans	1	SPCC Plan adherence	Yes, SPCC plan implementation protects stormwater from contamination with oils and petroleum products.
5	Facilities and Control Inventory	Annual Review of SWMP	1	Reviews	No, but allows for determination of stormwater sources and controls to ensure maps and tables of facilities are accurate.
5	Structural Control Maintenance	Institutional Knowledge	2	Departments inspecting structural controls	Yes, ensures that structural controls function as designed and maintained as necessary.
5	Grounds Maintenance	FMC Personnel	1	Departments providing service	Yes, helps to prevent trash and vegetation debris from impacting stormwater.

5	Visual Stormwater Contamination Assessment	Monthly reports	1; due to this being one month	Inspection	Yes, monthly outdoor inspections identify potential stormwater issues, in addition to the construction site inspections and EH&S compliance inspections.
5	Contractor Oversight	Plans	100%	Contractors overseen	No, but oversight of all contractors working on campus (not just related to construction), ensures compliance with all applicable environmental regulations and TWU requirements. This helps prevent illicit discharge incidents indirectly.
5	Disposal of Waste	Institutional Procedure	1	Regulated Waste Programs	Yes, proper profiling and disposal of all generated wastes ensures proper treatment and disposition off-site.

5	Operation and Maintenance Activities Assessment	FMC Personnel	1	Departments providing service	Yes, working with facilities and other TWU operations to ensure that pollutants of concern are controlled in the course of normal operations.
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4. Provide the measurable goals for each of the MCMs, and an evaluation of the success of the implementation of the measurable goals (**see Example 3 in instructions**):

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
1/2/5	Provide training for all current employees (100% of current employees)	Met goal of <i>providing</i> the training to 100% of employees (it is available online via LMS platform Bridge). That said, 100% of employees have not <i>completed</i> the training. Currently, 89% of our 2,802 current employees have completed the stormwater awareness training, and it continues to be a mandatory training. At the time of review, approximately 1% of additional employees were in progress on their training.
1	Review, update as necessary, Stormwater Management Program website	Met goal - Stormwater Management Program website was reviewed, updated as needed.
2	Review and update MS4 Map	Met Goal - reviewed MS4 map; no updates were needed at the time of review.

3	Perform site inspections regularly for 100% of construction sites	Met goal - 100% of construction sites were inspected regularly, either by FMC or EH&S staff.
4	Obtain documentation of new structural controls	Met goal - obtained documentation of all new structures on site to ensure required maintenance is conducted by TWU FMC as applicable.
5	Conduct 12 monthly stormwater inspections of the Denton campus	Met goal - 100% of monthly Stormwater inspections were conducted, with 1 of 1 inspections completed. (Shortened reporting period)

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.?

TWU relied primarily on EH&S compliance inspections and stormwater inspections to determine the success of the SWMP at reducing the discharge of pollutants. This included identifying illicit discharges, dirty streets, flow during dry weather, BMP's in place at construction sites, etc. and requiring corrective actions promptly by responsible parties.

D. Impaired Waterbodies

1. Identify whether an impaired water within the permitted area was added to the latest EPA-approved 303(d) list or the Texas Integrated Report of Surface Water Quality for CWA Sections 305(b) and 303(d). List any newly-identified impaired waters below by including the name of the water body and the cause of impairment.

No impaired waters were added to either list.

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

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

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

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

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

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

Benchmark Indicator	Description/Comments
N/A	

E. Stormwater Activities

Describe activities planned for the next reporting year:

MCM(s)	BMP	Stormwater Activity	Description/Comments
1/5	Employee Training	Continue training employees on SWMP	All new employees working on the Denton campus will continue to be required to complete this training. The training is available online and has been updated to better meet the needs of adult learners.
2	Illicit Discharge Hotline	Continue providing a hotline number which illicit discharges can be reported to	TWU EH&S will continue to maintain instructions for reporting illicit discharge on their Stormwater Management webpage.
3	Construction Site Inspections	Inspections of upcoming construction sites	TWU EH&S will conduct regular stormwater inspections of the construction projects on campus.

2/5	Visual Stormwater Contamination Assessment	EH&S compliance inspections and monthly stormwater inspections	TWU EH&S will continue to conduct campus-wide inspections and track corrective actions to completion.
4	Landscaping/Tree Planting	Planting and maintaining trees and vegetative buffers	TWU FMC will continue with landscaping efforts and inventorying trees on campus.
2	Dry Weather Screening	Conduct Quarterly Dry Weather Screening	TWU EH&S will conduct quarterly dry weather screening, in addition to monthly general inspections, to identify illicit discharges.

F. SWMP Modifications

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

☒ Yes ☐ No

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

☐ Yes ☒ No

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)
N/A	N/A	N/A

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

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

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			

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).

- 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?

___ Yes ___ No

If "Yes," list all associated authorization numbers, permittee names, and SWMP **responsibilities of each** member (add additional spaces or pages if needed):

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):

___4

- 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	
The total number of acres disturbed for municipal construction projects	

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): Hope Zavalin Title: Director, Environmental Health & Safety

Signature: _____ Date: _____

Name of MS4 Texas Woman's University MS4

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

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