

Victoria County Drainage District #3

1070 Bayer Rd
Victoria, TX 77905

April 14, 2023

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

**Re: Phase II MS4 Annual Report Transmittal for Victoria County Drainage District No. 3 TPDES Permit
Authorization: TXR040632**

Dear Team Leader:

This letter serves to transmit the 2022 Annual Report for the Texas Pollutant Discharge Elimination System Small Municipal Separate Storm Sewer System General Permit, Authorization Number TXR040632 for Victoria County Drainage District No. 3.

The annual report is for Year 4; with the reporting period beginning January 24, 2022 and ending January 23, 2023. This annual report is based on the Stormwater Management Plan submitted to TCEQ on June 26, 2019, which is still under review.

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

As required by the general permit, a copy of this submittal has also been mailed to the TCEQ's regional office 14 in Corpus Christi, Texas.

Should you have any questions, please do not hesitate to contact me at (361) 571-5760.

Sincerely,



Ryan Pletcher
Victoria County Drainage District #3 Commissioner

Attachments

Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number TXR040000

A. General Information

Authorization Number: TXR040632

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

Annual Reporting Year Option Selected by MS4:

Calendar Year: _____

Permit Year: X

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

Reporting period beginning date: (month/date/year) 1/24/2022

Reporting period end date: (month/date/year) 1/23/2023

MS4 Operator Level: 2 Name of MS4: Victoria County Drainage District #3

Contact Name: Ryan Pletcher Telephone Number: 361-571-5760

Mailing Address: P.O. Box 680 Telferner, TX 77988

E-mail Address: rpletcher@victoriacdd3.org

A copy of the annual report was submitted to the TCEQ Region: YES X

NO _____ Region the annual report was submitted to: TCEQ Region 14

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		Met all goals, except those requiring TCEQ's approval of SWMP (which is still under review)
Permittee is currently in compliance with recordkeeping and reporting requirements.	X		Record keeping documents kept onsite

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)
	See Attached	

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

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
		See Attached			

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.
	See Attached	

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.? See Attached

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.

N/A

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
	See Attached		

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		

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

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

G. Additional BMPs for TMDLs and I-Plans

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

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 ☐ No

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

Name and Explanation:

City of Victoria - interlocal agreement in place for the following items: distribute public education flyers; monitor outfalls; enforce erosion and sediment control requirements; oversee site plans and development; oversee construction site inspections and enforcement; oversee post-construction runoff control and site plans

Name and Explanation:

Victoria County - interlocal agreement in place for the following items: distribute public education flyers; publish annual article in newspaper; monitor outfalls; enforce OSSF requirements; enforce erosion and sediment control requirements; oversee site plans and development; oversee construction site inspections and enforcement; oversee post-construction runoff control and site plans

Name and Explanation:

Name and Explanation:

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

☐ Yes ☒ No

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

☐ Yes ☐ No

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

Authorization Number: _____ Permittee: _____

Authorization Number: _____ Permittee: _____

Authorization Number: _____ Permittee: _____

Authorization Number: _____ Permittee: _____

I. Construction Activities

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

See Attached

- 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): Ryan Pletcher Title: Commissioner

Signature: Ryan Pletcher Date: 4/14/2023

Name of MS4 Victoria County Drainage District #3

Name (printed): _____ Title: _____

Signature: _____ Date: _____

Name of MS4 _____

Name (printed): _____ Title: _____

Signature: _____ Date: _____

Name of MS4 _____

Name (printed): _____ Title: _____

Signature: _____ Date: _____

Name of MS4 _____

Name (printed): _____ Title: _____

Signature: _____ Date: _____

Name of MS4 _____

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

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

ATTACHMENTS TO THE ANNUAL REPORT

PERMIT TERM JANUARY 2022 TO JANUARY 2023

Section B-2

All of the BMPs listed in the SWMP (also listed in Section B-4 below) are appropriate for reducing the discharges

Section B-3 and C

The District does not measure pollutants within the streams but does have visual monitoring in its program. All outfalls are visually monitored by the City of Victoria and Victoria County. The District's boundaries overlap with the City and County, and the visual monitoring by these entities and adherence to their Stormwater Management Plans within the overlapping jurisdiction, has reduced the discharge of pollutants. Records of visual monitoring are kept by the City and County.

Section B-4

A table is attached outlining the BMP's in the 2022-2023 Permit Year.

Section E

A table is attached outlining the BMP's in the 2022-2023 Permit Year.

Section I

Interlocal agreements are in place between the District and both the City and County of Victoria individually. Per the interlocal agreements, the City and County oversee construction activities in the overlapping jurisdiction and maintain this data on a City- and County-wide basis.

Section B-2 and B-4
Permit Year Four - January 24, 2022 to January 23, 2023

MCM	BMP ID	Activity	Measurable Goal	Progress Toward Goal or How Goal Was Achieved
Public Education, Outreach and Involvement	BMP 1-1	Tax Bill Inserts	City and Council distribution	Goal met. The City and County continue their program
	BMP 1-2	Annual Newspaper Article	County Distribution	Goal met. The County continues its program
	BMP 1-3	Comply with State and Local Notice Requirements	Comply with notice requirements for District Meeting and Public Hearings (rollover goal from last year due to TCEQ not having yet approved the SWMP)	Goal not met. TCEQ is reviewing the SWMP; this will occur after SWMP approval.
	BMP 1-4	Advisory Committee	Advisory Committee meeting	Goal met. The Advisory Committee met individually during the permit term.
	BMP 1-5	Public Meetings	Hold the public meeting during District Board meeting to discuss changes to SWMP (rollover goal from last year due to TCEQ not having yet approved SWMP)	Goal not met. TCEQ is reviewing the SWMP; this will occur after SWMP approval.
	BMP 1-6	Public Access to the SWMP	Upload revised SWMP and 2022 Annual Report	Goal met. Website is updated with these items
Illicit Discharge Detection and Elimination	BMP 2-1	Storm Sewer Map	Evaluate map and modify if needed	Goal Met. Storm sewer map is up to date
	BMP 2-2	Illicit Discharge Procedures	City and County continue programs	Goal met. The City and County continue their program
	BMP 2-3	Program to Detect and Address Illicit Discharges	City and County continue programs	Goal met. The City and County continue their program
	BMP 2-4	Public Education on Illegal Discharges and Improper Disposal	Review materials and update if needed	Goal met. Website is updated with these items
	BMP 2-5	Illicit Discharge Reporting Hotline	Review foreman phone number and update website if needed	Goal met. Website is updated with these items
	BMP 2-6	On-Site Sewage Facilities	County Continue Program	Goal met. The County continues its program

Construction Site Stormwater Runoff Control	BMP 3-1	Construction Site Stormwater Runoff Control Regulations and Procedures	City and County continue programs	Goal met. The City and County continue their program
	BMP 3-2	Construction Site Stormwater Controls Reporting Hotline	Review foreman phone number and update website if needed	Goal met. Website is updated with these items
	BMP 3-3	Site Plan Reviews	City and County continue programs / continue site plan reviews	Goal met. The City and County continue their program
	BMP 3-4	Site Inspection and Enforcement Procedures	City and County continue programs	Goal met. The City and County continue their program
	BMP 3-5	Prohibited Discharges	City and County continue programs	Goal met. The City and County continue their program
Posts-Construction SW Management in New Development and Redevelopment	BMP 4-1	Post-Construction Stormwater Runoff Control Regulations and Procedures	City and County continue programs	Goal met. The City and County continue their program
	BMP 4-2	Plan Review and Inspection Programs	City and County continue programs / continue site plan reviews	Goal met. The City and County continue their program
Pollution Prevention and Good Housekeeping for Municipal Operations	BMP 5-1	Evaluate Watercourse Cleaning Activities	Review watercourse cleaning activities at each Board meeting	Goal met. Watercourse cleaning activities discussed at each meeting
	BMP 5-2	Inform Employees	Train new employees and hold information sharing session	Goal met. Training presentation is presented to employees for self-study refresher training annually
	BMP 5-3	Structural Controls	Determine if any structural controls have been added to District's inventory	Goal met. There are no structural controls in the District's inventory
	BMP 5-4	Waste Disposal	Review and implement the existing procedural document, and modify as needed	Goal met. Procedures are up to date.
	BMP 5-5	Municipal Operations and Maintenance Activities	Review and implement the existing procedural document, and modify as needed	Goal met. Procedures are up to date.
	BMP 5-6	Permittee-Owned Facilities and Control Inventory	Perform annual inspection	Goal met. Annual internal inspections are performed in-house

Section E

Permit Year Five - January 24, 2023 to January 23, 2024

MCM	BMP ID	Activity	Measurable Goal
Public Education, Outreach and Involvement	BMP 1-1	Tax Bill Inserts	City and Council distribution
	BMP 1-2	Annual Newspaper Article	County Distribution
	BMP 1-3	Comply with State and Local Notice Requirements	Comply with notice requirements for District Meeting and Public Hearings (rollover goal from last year due to TCEQ not having yet approved the SWMP)
	BMP 1-4	Advisory Committee	Advisory Committee meeting
	BMP 1-5	Public Meetings	Hold the public meeting during District Board meeting to discuss changes to SWMP (rollover goal from last year due to TCEQ not having yet approved SWMP)
	BMP 1-6	Public Access to the SWMP	Upload revised SWMP and 2022 Annual Report
Illicit Discharge Detection and Elimination	BMP 2-1	Storm Sewer Map	Evaluate map and modify if needed
	BMP 2-2	Illicit Discharge Procedures	City and County continue programs
	BMP 2-3	Program to Detect and Address Illicit Discharges	City and County continue programs
	BMP 2-4	Public Education on Illegal Discharges and Improper Disposal	Review materials and update if needed
	BMP 2-5	Illicit Discharge Reporting Hotline	Review foreman phone number and update website if needed
	BMP 2-6	On-Site Sewage Facilities	County Continue Program
Construction Site Stormwater Runoff Control	BMP 3-1	Construction Site Stormwater Runoff Control Regulations and Procedures	City and County continue programs
	BMP 3-2	Construction Site Stormwater Controls Reporting Hotline	Review foreman phone number and update website if needed
	BMP 3-3	Site Plan Reviews	City and County continue programs / continue site plan reviews
	BMP 3-4	Site Inspection and Enforcement Procedures	City and County continue programs
	BMP 3-5	Prohibited Discharges	City and County continue programs
Posts-Construction SW Management in New Development	BMP 4-1	Post-Construction Stormwater Runoff Control Regulations and Procedures	City and County continue programs
	BMP 4-2	Plan Review and Inspection Programs	City and County continue programs / continue site plan reviews
Pollution Prevention and Good Housekeeping for Municipal Operations	BMP 5-1	Evaluate Watercourse Cleaning Activities	Review watercourse cleaning activities at each Board meeting
	BMP 5-2	Inform Employees	Train new employees and hold information sharing session
	BMP 5-3	Structural Controls	Determine if any structural controls have been added to District's inventory
	BMP 5-4	Waste Disposal	Review and implement the existing procedural document, and modify as needed
	BMP 5-5	Municipal Operations and Maintenance Activities	Review and implement the existing procedural document, and modify as needed
	BMP 5-6	Permittee-Owned Facilities and Control Inventory	Perform annual inspection

Section E: Implementation Schedule and Status Report - Permit Year Five (2023-2024)