STORMWATER MANAGEMENT PROGRAM

TPDES General Permit Authorization No. TXR040057

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ACRONYMS AND ABBREVIATIONS

BMP	Best Management Practice
CFR	Code of Federal Regulations
CGP	Construction General Permit
CWA	Clean Water Act
EPA	United States Environmental Protection Agency
HRMUD	Horizon Regional Municipal Utility District
IDDE	Illicit Discharge Detection and Elimination
MCM	Minimum Control Measure
MEP	Maximum Extent Practicable
MS4	Municipal Separate Storm Sewer System
MSGP	Multi-Sector General Permit
NOC	Notice of Change
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
SOP	Standard Operating Procedure
SQPO	Stormwater Quality Protection Ordinance
SWMP	Stormwater Management Program
SWP3	Stormwater Pollution Prevention Plan
TCEQ	Texas Commission on Environmental Quality
TPDES	Texas Pollutant Discharge Elimination System
UA	Urbanized Area
U.S.	United States

1.0 INTRODUCTION

The Town of Horizon City (Horizon City) is located in El Paso County, east of the City of El Paso, Texas. Based on the 2017 Decennial Census by the United States (U.S.) Bureau of Census, a portion of the town is within the El Paso Urbanized Area (UA) (Figure 1). Under Phase II of federal and State of Texas stormwater regulations, municipalities within a UA are required to obtain permit authorization to discharge stormwater from their Municipal Separate Storm Sewer System (MS4). Horizon City's MS4 consists of its drainage systems, municipal roads, catch basins, curbs, gutters, ditches, channels, storm drains, ponding areas, and other structures designed to collect, convey, or store stormwater.

Horizon City had a population of less than 100,000 in the 1990 Decennial Census and is located within a UA, which defines the town as a small MS4. Small MS4s are eligible for authorization under the Texas Pollutant Discharge Elimination System (TPDES) General Permit No. TXR040000 authorizing discharges from small MS4s to surface water in the state (Small MS4 General Permit). The TPDES was modeled after the National Pollutant Discharge Elimination System (NPDES), which controls water pollution by regulating point sources that discharge pollutants into waters of the U.S. under the Clean Water Act (CWA).

In 2008, the Texas Center for Environmental Quality (TCEQ) issued its first Small MS4 General Permit. Horizon City submitted a Stormwater Management Program (SWMP) and a Notice of Intent (NOI) to the TCEQ to apply for coverage under this permit. The town was issued General Permit Authorization No. TXR040057, authorizing them to discharge stormwater under the Small MS4 General Permit.

On December 13, 2013, the TCEQ reissued TPDES General Permit No. TXR040000. Part II.A.3 of the Small MS4 General Permit states, *"Operators of small MS4s that were covered under the previous TPDES General Permit for small MS4s must reapply for permit coverage, or must obtain a waiver if applicable."* Horizon City is not eligible for a waiver under the reissued Small MS4 General Permit; therefore, the town will submit to TCEQ this updated SWMP and a NOI to reapply for permit coverage.

On January 24, 2019, the TCEQ reissued TPDES General Permit No. TXR040000. Horizon City has revised the existing SWMP and prepared the NOI to reapply for authorization under the Small MS4 General Permit. Horizon City has not combined or shared efforts with any other MS4 operator and is solely responsible for implementation of this SWMP. The Small MS4 General Permit divides small MS4s into four categories by level. Horizon City is in the **Level 2** category, which includes "*Operators of traditional small MS4s that serve a population of at least 10,000 but less than 40,000 within a UA*."

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2.0 TOWN OF HORIZON CITY

2.1 HISTORY AND BOUNDARIES

The Town of Horizon City is located at the eastern side of the City of El Paso, Texas. In the 1970s the development of Horizon City began as a golf course retirement community. In 1988 the area was incorporated as the Town of Horizon City and is surrounded by unincorporated portions of El Paso County.

In the past decade, the town has experienced rapid growth and population has increased substantially from 5,233 in 2000 to 16,735 in 2010 to 19,562 in 2017 according to the 2017 Decennial Census. Much of this growth has occurred within suburban or ex-urban residential communities. The corporate boundaries encompass approximately 8.71 acres of land to the northeast of Interstate-10 (Figure 1). There have been no changes to the town limits since the previous SWMP was prepared in 2014.

2.2 GOVERNANCE AND OPERATIONS

Horizon City is governed by a mayor and seven council members elected at large. The town currently employs 73 people. The Public Works Department and Building Services are responsible for plan review and inspection of new construction, code compliance, and operation of streets and drainage infrastructure. The Planning Department oversees plat development and maintenance of public facilities and parks. Staff positions in these departments are shown on the organizational chart in Figure 2. An engineering firm is under contract to assist Horizon City with development plan review.

The Horizon Regional Municipal Utility District (HRMUD) provides water, sanitary sewer, and trash collection services for the town. Other utilities, including electric and natural gas, are provided by commercial utility companies. Fire response, fire code compliance inspections, and ambulatory services (including emergency medical technicians) are provided by the El Paso County Emergency Services District #1. Public schools are provided by the Clint and Socorro Independent School Districts.

2.3 TOPOGRAPHY AND RECEIVING WATERS

Most of the Town is in relatively flat area of desert terrain except for the western edge. According to the Natural Resources Conservation Service Soil Survey Map of El Paso County, the soils are predominantly composed of the Hueco-Wink association, hummocky. The soils are composed of sand sheets that developed into hummocks in the last century due to vegetation changes from overgrazing, drought, and other conditions. Precipitation collects in the depressions between hummocks and either infiltrates into the sandy loam or evaporates. Depth to groundwater is greater than 80 inches. Water rapidly infiltrates and does not pond for any significant period of time. Stormwater does not discharge to surface water from these depressions.

Due to the lack of natural drainage features in the central and eastern portions of town, retention structures are constructed for new development. At the time this SWMP was prepared, there were no known stormwater discharges to waters of the U.S. from these areas.

An escarpment lies along the western edge of the town (Figure 3). Precipitation that falls within this portion of the town discharges to a series of southwesterly trending arroyos. During frequent storm events, stormwater runoff discharged into the arroyos infiltrates quickly without any measurable flow developing. During larger, less frequent storm events, runoff generates flow in the arroyos, which are intercepted by the embankments on the north side of the Mesa Spur Drain, an irrigation acequia located in the City of Socorro, south of Interstate 10. During these larger storm events, there is the potential for MS4 discharges from the Horizon City to be conveyed by the arroyos into the Mesa Spur Drain.

The Mesa Spur Drain connects to a series of irrigation drains that ultimately discharge to Rio Grande Segment 2307_05. The Environmental Protection Agency (EPA)-approved 2012 Texas 303(d) List has identified bacteria, chloride, and total dissolved solids as pollutants of concern for this segment of the Rio Grande. At this time, there are no approved Total Maximum Daily Loads established for these pollutants; therefore, no waste load allocations of these pollutants have been established for MS4s. Although MS4 discharges from the Horizon City may ultimately reach Rio Grande Segment 2307_05 after large storm events, the MS4 does not discharge directly to this impaired segment of the Rio Grande. Therefore, no plan is required for compliance with discharges to impaired water bodies.

2.4 SWMP DEVELOPMENT

The introductory paragraph to Part III of the Small MS4 General Permit states: *"The SWMP must be developed, implemented, and enforced to reduce the discharge of pollutants from the small MS4 to the maximum extent practicable (MEP), to protect water quality, and to satisfy the appropriate water quality requirements of the CWA and the Texas Water Code."* This SWMP includes the five Minimum Control Measures (MCMs) required by the Small MS4 General Permit for a Level 2 MS4 to comply with the MEP requirement, as well as the optional seventh MCM for Municipal Construction Activities. The following considerations were made when selecting best management practices (BMPs) and measurable goals for each MCM:

- Existing BMPs and activities that could be expanded upon from the previous SWMP
- Resources available for a Level 2 MS4 operator
- Stormwater discharge effects of the topography and arid climate
- High-priority issues that have been identified during implementation of the previous SWMP

Horizon City has elected to develop and implement this SWMP for the entire area within the corporate limits of the town (Figure 1) *not* just within the designated UA.

2.5 LEGAL AUTHORITY

During the last Small MS4 General Permit term, Horizon City adopted a Stormwater Quality Protection Ordinance (SQPO); Ordinance No. 0192 (Appendix A). The SQPO provides Horizon City the legal authority to control pollutant discharges into and from their small MS4 in order to meet the requirements of the Small MS4 General Permit. The SQPO, as it relates to prohibiting illicit discharges and requiring controls for construction activities, is discussed in BMPs 2-1 and 3-1 of Sections 3.2.2.1 and 3.3.2.1, respectively. The measurable goals for these BMPs include reviewing the SPQO and revising it, if necessary, by the end of the third permit year.

3.0 MINIMUM CONTROL MEASURES

The MCMs and associated BMPs, written procedures to be developed, schedule for implementation, and measurable goals are defined in this section and summarized in tables at the end of this document. The Horizon City Public Works Director is responsible for implementing this SWMP and creating a SWMP Standard Operating Procedures (SOP) binder. Procedures to be developed for each MCM are described under the BMP where the procedure is needed and will be maintained in the hardcopy or electronic SOP binder.

3.1 PUBLIC EDUCATION, OUTREACH, AND INVOLVEMENT

3.1.1 REQUIRED ELEMENTS

The introductory paragraph from Part III.B.1(a)(1) of the Small MS4 General Permit states:

> *"All permittees shall develop, implement, and maintain a comprehensive stormwater education and outreach program to educate public employees, businesses, and the general public of hazards associated with the illegal discharges and improper disposal of waste and about the impact that stormwater discharges can have on local waterways, as well as the steps that the public can take to reduce pollutants in stormwater."*
>
> *"Existing permittees shall assess program elements that were described in the previous permit, modify as necessary, and develop and implement new elements, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP."*

The education program is required to inform the public about the role they can play in improving stormwater quality. The general public (residents and visitors), businesses (including industrial and commercial facilities), and construction site personnel have been identified as target audiences. During the 5-year implementation period of the previous SWMP, the town identified the following high-priority, community-wide issues that will be addressed in this SWMP:

- Illegal dumping into the stormwater system
- Trash and debris that litter the stormwater system
- Pollutants that constrict and damage stormwater infrastructure

The BMPs for public education, outreach, and involvement have been updated to include a focus on these high-priority issues. The goal of this focus is to reduce the amount of trash, debris, dumped items, and other pollutants that clog and damage the MS4. Objectives are to identify sources of these high-priority pollutants, reach target audiences associated with these pollutants through education and involvement, and encourage public reporting of illegal dumping and discharges of trash, debris, and high priority pollutants.

Written procedures will be developed as discussed in the BMPs (Section 3.1.2) and on the schedule in the Measurable Goals (Section 3.1.3). The written procedures will be maintained on-site or in this SWMP and will be made available for inspection by the TCEQ.

3.1.2 BEST MANAGEMENT PRACTICES

3.1.2.1 EDUCATIONAL MATERIALS AND DISTRIBUTION (BMP 1-1)

High-priority issues described in Section 3.1.1 will be the focus of new educational materials to be distributed in conjunction with existing educational material (Appendix B). The new

materials may be developed by Horizon City, EPA, TCEQ, or other sources and may include information sheets, brochures, stencils, etc. Educational materials for the general public are available at the Town Hall and on the Horizon City Website and will continue to be distributed by the code enforcement officer/compliance inspector when responding to calls. There are an estimated 20,000 people that view stormwater educational materials at municipal buildings, including City Hall, the Police Department, and Municipal Court. Educational material currently distributed to the general public addresses:

- Pet waste management
- Applying lawn chemicals
- Water conservation practices
- Car washing
- Automobile maintenance
- Household hazardous wastes
- Reporting construction site and illicit discharges

In addition to the above materials, Horizon City will develop new educational material for the general public to address the high-priority issues. Examples of materials that may be used to educate the public about their role in limiting trash, litter, and illegal dumping in the MS4 include, but are not limited to, the following:

- Anti-litter banners on the town's webpage
- Don't Trash Texas materials from the Texas Department of Transportation
- Materials advertising ways to report illegal dumping
- No dumping signs in identified problem areas
- Brochures and pamphlets focused on solid waste management

Educational material for businesses will be distributed when commercial and industrial businesses apply for a license. These materials previously were distributed with a certificate of occupancy and reached an average of only 20 businesses per year. The code enforcement officer and building inspector will continue to distribute educational materials when inspecting businesses or responding to calls. Educational material currently distributed to businesses may address the following issues:

- Information from the TCEQ Small Business and Local Government Assistance office
- TPDES Multi-Sector General Permit (MSGP) No. TXR050000 for stormwater discharges from industrial activities
- Pollution prevention practices
- Illicit discharges

Educational material for construction site operators will continue to be distributed when developers submit plans for review and when contractors apply for building permits in coordination with BMP 3-5 of this SWMP. Educational material for construction activities may address the following issues:

- TPDES Construction General Permit (CGP) No. TXR150000 for stormwater discharges from construction activities
- Stormwater Pollution Prevention Plans (SWP3)
- Construction waste management
- Illicit discharges

Educational material for public service employees has been developed as part of employee training for pollution prevention and good housekeeping in accordance with BMP 5-2, Section 3.5.2.2, of this SWMP.

3.1.2.2 ARTICLES IN THE *WEST TEXAS COUNTY COURIER* (BMP 1-2)

The *West Texas County Courier (Courier)* newspaper is published each Thursday by Homesteader News, Inc., whose offices are in Horizon City. It is distributed free through racks and countertops in the communities of El Paso County. Approximately 800 copies of the *Courier* are distributed within Horizon City each week. In addition, the *Courier* is also distributed directly to the employees of the Clint and Socorro Independent School Districts that serve Horizon City. Horizon City will continue to prepare stormwater-related articles for publication in the *Courier*. At least one of the two articles published annually will focus on the high-priority issues listed in Section 3.1.1 of this SWMP.

3.1.2.3 HORIZON CITY WEBSITE (BMP 1-3)

Horizon City maintains a website on which stormwater information is posted. Information posted on the website consists of articles and brochures similar to the material distributed at the Town Hall or published in the *Courier*. Once developed, educational material related to high-priority issues listed in Section 3.1.1 will be posted on the website with existing educational material. The website also includes announcements for stormwater-related public activities, stormwater permit and ordinance requirements for businesses and construction sites, and links to stormwater related sites such as the TCEQ and EPA Websites. The website receives over 100 visitors to pages containing stormwater-related material every year.

Horizon City will add a link on the website for people to access the SQPO. After approval by the TCEQ, an electronic copy of this SWMP also will be posted on the website. The website will be used to solicit public comment on the SWMP and involvement in SWMP activities, such as annual cleanup days. The town will develop procedures to regularly check for comments received via the website, record and respond to the comments, and track their resolution.

3.1.2.4 ANNUAL EVENT OR FESTIVAL (BMP 1-4)

Horizon City has held numerous public events in the past where stormwater educational materials were distributed. Approximately 90 people visited the stormwater educational display at each event or festival. The town will continue to distribute materials at one annual event or festival each year.

3.1.2.5 PUBLIC NOTICE FOR MEETINGS (BMP 1-5)

Horizon City is subject to state and local public notice requirements when the City Council meets. The town posts public notices when items related to the Small MS4 General Permit or the SWMP are on the City Council agenda. The notices are posted at the Town Hall and on Horizon City's Website. Public notices will continue to be posted when the town is modifying an

existing ordinance or passing a new ordinance related to stormwater or is hearing an issue involving the SWMP.

After the TCEQ Executive Director issues a preliminary determination on Horizon City's NOI and SWMP, the town will receive written instructions from the TCEQ for a public notice of the determination. This public notice is a condition of the Small MS4 General Permit and does not fulfill the requirements for public notice in this MCM.

3.1.2.6 POLLUTION REPORTING TELEPHONE NUMBER (BMP 1-6)

Horizon City has established 877-ID-FLOWS (877-433-5697) as the number to report pollutants that affect stormwater. The town will continue to publish the established reporting number in educational materials and on the Horizon City Website. This number enables citizens to report issues they observe that could affect stormwater quality, such as illicit discharges and illegal dumping. The town will develop written procedures to record and respond to the reports they receive and to track their resolution. The town's employees will be trained to answer and properly respond to calls concerning stormwater issues.

3.1.2.7 ANNUAL PUBLIC CLEANUP EVENT (BMP 1-7)

Horizon City has an annual "*Keep Horizon City Beautiful*" event as part of the Keep America Beautiful initiative. This event gives citizens an opportunity to participate in the implementation of control measures within the community. The benefits of this event is the removal of trash and debris from the MS4. It is also a platform to educate the public about the connection between their actions and the resulting impacts on the MS4, the community, and their quality of life. The ultimate goal is to alter the public's perception and behavior toward stormwater quality.

3.1.3 MEASURABLE GOALS

BMP 1-1:

- Develop or identify and procure one educational item to address each high-priority issue listed in Section 3.1.1 (November 2019).

Providing stormwater information will aid in decreasing sources of non-point source pollution, reduce illicit discharges, and encourage compliance with other TPDES permits that improve stormwater quality.

BMP 1-2:

- Publish two stormwater articles in the *West Texas County Courier* by November of each year, including one related to high-priority community-wide issues.

Providing stormwater educational material in the *West Texas County Courier* enables Horizon City to reach residents and visitors who do not come into contact with municipal services/facilities where other educational materials are provided.

BMP 1-3:

- Post a link to the SQPO on the Horizon City Website https://www.horizoncity.org/storm-water-management/ (September 2019).
- After approval by the TCEQ, post a link to the SWMP and a link soliciting public comment on the SWMP (November 2019).

- By April of each year, post the annual report and any newly developed stormwater related materials.
- Develop/Update written procedures for handling comments received via the website (By November of each year).

Use of a website to provide stormwater educational materials can make it easier for businesses, commercial and industrial facilities, and construction site personnel to obtain information assisting in the compliance with ordinances and permits and assists in the prevention of stormwater pollution. It also enables the general public to easily find the telephone number to report illicit and construction site discharges.

BMP 1-4:

- Distribute educational stormwater material at one festival or event by November of each year.

Distributing educational material at a public event may increase awareness of how routine actions impact stormwater quality and encourage change in behaviors, potentially decreasing the sources of non-point source pollution.

BMP 1-5:

- Post a Public Notice when the SWMP is presented to the Horizon City Council (May 2019).

Including ordinances and other items related to the SWMP on the publicly posted City Council Agenda will provide an opportunity for citizens to attend the council meeting and comment on the documents.

BMP 1-6:

- Develop written procedures for handling stormwater reports (November 2019).
- Train the town's employees on how to respond to stormwater reports (April 2020).

Publicizing the telephone number to report illicit discharges, construction site discharges, and other stormwater concerns will enable Horizon City to decrease and prevent pollutants from entering stormwater by encouraging citizen involvement in recognizing and reporting pollutant sources. Training the town's employees will ensure an understanding of the importance of responding to the citizen reports and the procedures for addressing the different types of stormwater issues.

BMP 1-7:

- Host a "*Keep Horizon City Beautiful*" event by November of each year.

Hosting an annual cleanup event promotes community involvement and presents a stage to educate the public first hand.

3.2 ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE)

3.2.1 REQUIRED ELEMENTS

The introductory paragraph from Part III.B.2.(a).(1) of the Small MS4 General Permit states:

"All permittees shall develop, implement and enforce a program to detect, investigate, and eliminate illicit discharges into the small MS4. The program must include a plan to detect and address non-stormwater discharges, including illegal dumping to the MS4 system."

"Existing permittees must assess program elements that were described in the previous permit, modify as necessary, and develop and implement new elements, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP."

An illicit discharge is any discharge to an MS4 that is not entirely composed of stormwater, except for discharges allowed under the Small MS4 General Permit (or a separate authorization) and discharges resulting from emergency fire fighting activities. The following non-stormwater discharges are authorized under the Small MS4 General Permit and are *not* considered illicit discharges as defined in Part II.C of the Small MS4 General Permit and are not addressed by the SWMP activities:

- Water line flushing (excluding discharges of hyper-chlorinated water, unless the water is first de-chlorinated and discharges are not expected to adversely affect aquatic life)
- Runoff or return flow from landscape irrigation, lawn irrigation, and other irrigation utilizing potable water, groundwater, or surface water sources
- Discharges from potable water sources that do not violate Texas Surface Water Quality Standards
- Diverted stream flows
- Rising ground waters and springs
- Uncontaminated groundwater infiltration
- Uncontaminated pumped groundwater
- Foundation and footing drains
- Air conditioning condensation
- Water from crawl space pumps
- Individual residential vehicle washing
- Flows from wetlands and riparian habitats
- Dechlorinated swimming pool discharges that do not violate Texas Surface Water Quality Standards
- Street wash water excluding street sweeper waste water
- Discharges or flows from fire fighting activities (fire fighting activities do not include washing of trucks, runoff water from training activities, test water from fire suppression systems, and similar activities)
- Other allowable non-stormwater discharges listed in 40 CFR §122.26(d)(2)(iv)(B)(1)
- Non-stormwater discharges that are specifically listed in the TPDES MSGP or the TPDES CGP

- Discharges that are authorized by a TPDES or NPDES permit or that are not required to be permitted
- Other similar occasional incidental non-stormwater discharges, unless the TCEQ develops permits or regulations addressing these discharges

The SWMP is required to include development of an ordinance or other regulatory mechanism that prohibits illicit discharges and provides authority to trace and eliminate the source of illicit discharges. For the purpose of detecting and eliminating illicit discharges, the Small MS4 General Permit specifically requires the MS4 operator to:

- develop a map of the MS4;
- develop methods for training MS4 field staff;
- develop procedures for tracing the source of an illicit discharge;
- develop procedures for removing the source of the illicit discharge;
- facilitate public reporting of illicit discharges;
- develop procedures for responding to illicit discharges and spills; and
- develop procedures for performing inspections in response to public complaints.

Written procedures will be developed as discussed in the BMPs (Section 3.2.2) and on the schedule in the Measurable Goals (Section 3.2.3). The written procedures will be maintained on-site or in this SWMP and made available for inspection by the TCEQ.

3.2.2 BEST MANAGEMENT PRACTICES

3.2.2.1 ORDINANCE PROHIBITING ILLICIT DISCHARGES (BMP 2-1)

During the term of the previous Small MS4 General Permit, the town developed and implemented ordinance number 0192, SQPO to improve its ability to eliminate illicit discharges. A copy of the ordinance is in Appendix A. The SQPO became effective in Horizon City on September 20, 2011. The purpose of this ordinance is to:

- define illicit discharges;
- maintain and improve stormwater quality and surface water quality;
- promote public awareness;
- facilitate compliance with state and federal standards and permits by operators of industrial and construction activities;
- identify non-stormwater discharges that are not considered illicit;
- prohibit illicit connections and discharges; and
- establish legal authority and enforcement procedures for removing the source of an illicit discharge.

Enforcement actions for illicit discharges occur in response to observations made during other code enforcement activities, citizen reports, or the detection of an illicit discharge during outfall inspections. Enforcement actions may be, but are not limited to, the following, as described in Sections 12 and 13 of the SQPO:

- Notice of violation
- Emergency cease and desist order
- Stop work order
- Nuisance abatement order
- Criminal penalties of up to $2,000 per violation, per day

During the next term of the Small MS4 General Permit, Horizon City will develop written procedures for using the ordinance to eliminate (remove) illicit discharges, including enforcement and enforcement escalation procedures. The town will also review and revise, if needed, the SQPO to ensure the town has adequate legal authority to meet the requirements of Part III.A.3.(a) of the Small MS4 General Permit.

3.2.2.2 MS4 MAPPING (BMP 2-2)

A majority of Horizon City lies in a hummocky area of the Chihuahuan Desert, where precipitation collects in depressions. The water in the depressions either evaporates or infiltrates without entering the MS4. MS4 outfalls are only possible along the western portion of town, where the escarpment provides sufficient relief for flow to develop in the MS4 and discharge into the arroyos.

Based on the resources available for a town of this size and the small number of potential outfalls, a geographic information system (GIS)-based system for mapping the MS4 infrastructure and outfalls is not practicable. Each arroyo that crosses the corporate limits of the town has been identified visually, including the associated outfalls. The outfalls have been noted on an aerial map of the town with each outfall identified by the legal description of the parcel best associated with it (Figure 4). Priority areas associated with illicit discharges are not required to be identified per Part III.B.2.(a)(1) of the Small MS4 General Permit since Horizon City is not a Level 4 MS4. Therefore, priority areas are not identified on the outfall map.

The outfall map will be maintained and updated with any new outfalls based on the content of town approved development plans and annual inspections.

3.2.2.3 STAFF TRAINING (BMP 2-3)

Annual, 30-minute training sessions will be conducted for town employees that may observe or come into contact with an illicit discharge while performing their normal duties. Training will be performed in-house by the MS4 Program Manager. The training will discuss types of illicit discharges, examples of authorized discharges, and procedures for reporting suspected illicit discharges. For staff assigned the duty of enforcing the SQPO, the MS4 Program Manager will provide an additional, a 1-hour, annual training session to discuss written procedures for responding to illicit discharges and spills (BMP 2-4), procedures for tracing the source of an illicit discharge (BMP 2-4), and procedures for eliminating illicit discharges (BMP 2-1). This annual training will also provide an opportunity to review illicit discharges detected during the prior year.

3.2.2.4 SYSTEM INSPECTIONS (BMP 2-4)

Outfalls will be inspected visually twice per year for signs of illicit discharges. Since Horizon City is in an arid region and surface water bodies are not present, any discharge detected is likely

to be an illicit discharge. If a discharge is observed, a sample will be collected for detection of sheen, odor, foam, color, and pH.

Written procedures will be developed to respond to an illicit discharge or connection and determine the source. Administrative enforcement remedies will occur as established in Section 12 of the SQPO in an effort to eliminate the illicit discharge or connection; penalties are described in Section 13 of the ordinance.

3.2.2.5 PUBLIC REPORTING OF ILLICIT DISCHARGES (BMP 2-5)

Due to the limited number of code enforcement officers, encouraging citizens to report illicit discharges can significantly increase the number of illicit discharges found and eliminated. A phone number has been publicized (e.g., via the Horizon City Website and *West Texas County Courier*) to facilitate the reporting of prohibited discharges that are observed by the public. Educational materials publicizing the phone number include information about the types of discharges that are prohibited. For additional information on educational material and public reporting, please refer to BMP 1-1 and BMP 1-6, Sections 3.1.2.1 and 3.1.2.6, respectively. Written procedures for responding to a reported illicit discharge or spill and determining the source are addressed in BMP 2-4, Section 3.2.2.4 of this SWMP.

3.2.2.6 ON-SITE SEWAGE DISPOSAL SYSTEMS (BMP 2-6)

El Paso County (a Level 2, Small MS4 Operator) has the primary responsibility and authority to permit and inspect on-site sewage disposal systems within the Horizon City. HRMUD operates and maintains the sanitary sewer systems within Horizon City. Horizon City will develop a written agreement between the town and the county to define reporting, response, and documentation procedures when an on-site sewage system is determined to be the source of an illicit discharge. These procedures will be consistent with those that El Paso County is required to develop for its SWMP. These reporting, response, and documentation procedures will be the foundation for a collaborative response program to correct and prevent, if possible, any leaking on-site sewage disposal system within the boundaries of Horizon City.

3.2.3 MEASURABLE GOALS

<u>BMP 2-1</u>

- Review and revise, if necessary, the SQPO to meet the requirements of Part III.A.3.(a) of the Small MS4 General Permit (November 2020).
- Review and revise, if necessary, the written procedures for using the ordinance to eliminate (remove) illicit discharges, including enforcement and enforcement escalation procedures (November 2019).

A stormwater quality ordinance gives Horizon City authority to enforce penalties for illicit discharges. An ordinance will facilitate the enforcement of penalties for violations of the towns SWMP and a reduced number of illicit discharges.

<u>BMP 2-2</u>

- By November of each year, add new outfalls to the MS4 Map that result from development.

The MS4 map will facilitate the detection of illicit discharges in the MS4.

BMP 2-3

- Develop or identify and procure staff training materials (by December of each year).
- Conduct annual in-house training for employees involved in illicit discharge detection and elimination (by December of each year).

Annual training will ensure town personnel are able to identify an illicit discharge while performing routing job responsibilities. The additional training for staff responsible for enforcing the ordinance will ensure proper implementation of procedures to successfully stop illicit discharges and equitable enforcement of the ordinance. It will also provide the opportunity to learn from each other as the prior year's illicit discharges are reviewed. Training materials and attendance logs will be maintained and made readily available to the TCEQ.

BMP 2-4

- By November of each year, visually inspect each outfall for illicit discharges twice.
- Update the written procedures to respond to an illicit discharge or connection and determine the source (November 2023).

Inspections will provide an opportunity to detect and eliminate illicit discharges. Procedures to respond to an illicit discharge will be developed in conjunction with the administrative enforcement remedies established in the SQPO

BMP 2-5

Measurable goals for a public reporting system that includes public education about and reporting of illicit discharges are as described in BMP 1-1 and BMP 1-6, Sections 3.1.2.1 and 3.1.2.6, respectively. Measurable goals for responding to a reported illicit discharge or spill and determining the source are described in BMP 2-4, Section 3.2.2.4.

BMP 2-6

- Update/Obtain a map of sewer coverage from HRMUD to determine where on-site sewage systems may exist (November 2022).
- Develop a written agreement between Horizon City and El Paso County to define reporting and documentation procedures for identifying and correcting leaking on-site sewage disposal systems (November 2021).

An agreement will provide the authority to correct on-site sewage disposal systems with the Horizon City.

3.3 CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

3.3.1 REQUIRED ELEMENTS

The introductory paragraph from Part III.B.3.(a).(1) of the Small MS4 General Permit states:

> *"All permittees shall develop, implement and enforce a program requiring operators of small and large construction activities, as defined in Part I of this general permit, to select, install, implement, and maintain stormwater control measures that prevent illicit discharges to the MEP."*

"Existing permittees shall assess program elements that were described in the previous permit, modify as necessary, and develop and implement new elements, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP."

The SWMP is required to include development of an ordinance or other regulatory mechanism that requires controls for construction site discharges, prohibits illicit discharges from construction sites, and provides a means of ensuring compliance with these requirements. The Small MS4 General Permit specifically requires the MS4 operator to:

- Develop a program that prohibits construction activity discharges listed in the TPDES CGP;
- Update procedures for site plan review to consider water quality impacts;
- Update procedures for construction site inspection and enforcement of control measures;
- Develop procedures for receipt and consideration of input from the public; and
- Update/develop procedures for MS4 staff training.

Written procedures will be developed as discussed in the BMPs (Section 3.3.2) and on the schedule in the Measurable Goals (Section 3.3.3). The written procedures will be maintained on-site or in this SWMP and made available for inspection by the TCEQ.

3.3.2 BEST MANAGEMENT PRACTICES

3.3.2.1 ORDINANCE REQUIRING CONSTRUCTION SITE CONTROLS (BMP 3-1)

Horizon City has developed and implemented the SQPO as a means to reduce pollutants entering the MS4 from construction activities. The ordinance includes the following:

- Requirements for construction activity operators to comply with the TPDES CGP, including development and implementation of a Stormwater Pollution Prevention Plan (SWP3) as an alternative to specific soil stabilization requirements, pollutant control requirements, and construction site discharge prohibitions, when the CGP is applicable to the construction site
- Prohibitions on illicit discharges such as washout wastewater, fuels, oils, soaps, solvents, and contaminated dewatering discharges
- Requirements for the site plan and SWP3 to be submitted to Horizon City for review prior to construction
- Requirements for control of construction site wastes
- Authority to inspect construction sites for compliance with the ordinance
- Enforcement procedures
- Authority to prohibit discharges into the MS4

During the next term of the Small MS4 General Permit, Horizon City will review and revise the written enforcement and enforcement escalation procedures to implement the construction site requirements in the ordinance. The town will also review and revise, if needed, the SQPO to ensure the town has adequate legal authority to meet the requirements of Part III.A.3.(a) of the Small MS4 General Permit.

3.3.2.2 PLAN REVIEW (BMP 3-2)

Horizon City hired staff to review plans for commercial and residential subdivision developments. Also, Horizon City contracts an engineering firm to act as Town Engineer and assist in plan review as well. Their review includes verifying that a SWP3 is in the plan set. The engineering firm uses a SWP3 review checklist when reviewing the SWP3. The town staff reviews the SWP3 for all other construction activities that require a town permit and disturb 1 acre or more of soil or are part of a common plan of development that disturbs 1 acre or more of soil. Horizon City has prepared educational materials (BMP 3-5) and a SWP3 review checklist to help the construction site operator prepare the SWP3.

During the next permit period, written procedures will be updated to document, track, and ensure that all construction activities required to comply with the TPDES CGP submit a SWP3 to the town for review and acceptance before the town issues any permits or permissions to start work. SWP3 review checklists currently in use will be reviewed and revised, if necessary, to be compliant with the TPDES CGP effective April 1, 2019.

3.3.2.3 CONSTRUCTION SITE INSPECTIONS (BMP 3-3)

Horizon City will review and update the program where they inspect construction sites for compliance with a SWP3 within 1 week of the start of construction, and additional inspections will be conducted based on reports and complaints. Construction site inspection and enforcement procedures will be updated to ensure compliance with SQPO requirements related to construction sites. In addition, a system will be developed for tracking NOIs filed by construction site operators. These NOIs will be used to schedule construction site inspections. A copy of the NOI is required by the SQPO to be submitted to Horizon City before the town will issue a permit or other authorization to disturb soil.

3.3.2.4 PUBLIC REPORTING OF CONSTRUCTION DISCHARGES (BMP 3-4)

Pollutants in stormwater from construction sites and construction wastes often are released into public streets and onto adjacent properties. These discharges are easily visible to the public and may affect their quality of life. Providing a means for the public to report these observations can assist Horizon City in reducing discharges from construction sites. The Stormwater Reporting Telephone Number will continue to be publicized to facilitate reporting of problems the public observes at construction sites. Educational materials publicizing the phone number include information concerning construction site discharges; refer to BMP 1-1 and BMP 1-6, Sections 3.1.2.1 and 3.1.2.6, respectively, for further details. Procedures will be developed for receiving, tracking, and responding to public reports.

3.3.2.5 CONSTRUCTION SITE OPERATOR EDUCATION (BMP 3-5)

One component of BMP 1-1, Section 3.1.2.1, is directed toward construction site operators working in Horizon City. It includes information concerning the requirement to obtain coverage under the CGP, the requirement to prepare a SWP3, and general stormwater awareness information (Appendix B). Educational material will continue to be distributed to construction site operators when they submit development plans for review or request a building permit. Copies also will be provided to building inspectors to distribute when they are on construction sites. In addition, Horizon City will develop or obtain one educational item for construction site operators that is focused on the high-priority issues identified in Section 3.1.1.

3.3.2.6 MS4 STAFF TRAINING (BMP 3-6)

Horizon City employees whose job responsibilities include implementing the construction stormwater program will be trained to perform duties that include, but are not limited to:

- TPDES CGP compliance;
- SWP3 review;
- SWP3 inspections; and
- enforcement of the construction activity requirements of the SQPO.

Horizon City employees will attend an 8- or 16-hour training provided by a commercial vendor that pertains to the duties described. Additional staff whose primary job responsibilities are construction and building inspections will attend a 1-hour, in-house, awareness training provided by the MS4 Program Manager and receive a checklist to aid in identifying illicit discharges in the field.

3.3.3 MEASURABLE GOALS

BMP 3-1

- Review and revise, if necessary, the SQPO to ensure it meets the requirements of Part III.A.3. (a) of the Small MS4 General Permit (Annually).
- Review and update, if necessary the written enforcement and enforcement escalation procedures for the construction site requirements in the SQPO (Annually).

The SQPO provides Horizon City the authority to require erosion and sediment controls, require compliance, inspect construction sites, and ensure compliance through enforcement.

BMP 3-2

- Review and update, if necessary, SWP3 review checklists to be compliant with the current TPDES CGP. (Annually)
- Review and update written procedures for reviewing and tracking all other SWP3s (Annually).

Checklists will continue to facilitate a thorough review of SWP3s, which hopefully will decrease pollutant discharges in stormwater runoff from construction sites. Collaborative review procedures will promote consistency and accuracy during the review process.

BMP 3-3

- Review and update (if necessary) the NOI tracking system (Annually).
- Review and update (if necessary) the written construction site inspection and enforcement procedures for compliance with the SQPO (Annually).

A system to track CGP NOIs will facilitate planning of construction site inspections. A construction site inspection program increases implementation of erosion and sediment controls, BMPs, and soil stabilization techniques, thus reducing the discharge of pollutants from construction sites.

BMP 3-4

- Review and update written procedures for receiving, tracking, and responding to public reports (Annually).

Publicizing the telephone number to report construction site discharges will enable Horizon City to decrease the pollutants that enter the MS4 from entering construction sites by encouraging citizen involvement in recognizing and reporting the discharges.

BMP 3-5

BMP 3-5 is fully implemented; therefore, no measurable goal is needed.

Horizon City will continue to distribute educational material to construction site operators when they submit development plans for review or request a building permit by November of each year. Providing stormwater information to construction site operators will aid in decreasing sources of non-point source pollution, reduce illicit discharges, and encourage compliance with the TPDES CGP to improve stormwater quality.

BMP 3-6

- Provide 8 to 16 hours of commercially available training in SWP3 review and inspection to staff who perform these duties (Annually). Provide the same training to new staff who perform these duties by November of each following year, as necessary.
- By November of each year, conduct 1-hour of in-house, construction stormwater awareness training for employees (other than SWP3 inspectors) who visit construction sites.
- Review and update (if necessary) the checklist and procedures for employees (other than SWP3 inspectors) to screen construction sites for prohibited discharges (Annually).

Attending comprehensive training will ensure construction stormwater staff has the level of competency and expertise to perform job duties related to the construction stormwater program. The 1-hour stormwater awareness training will facilitate identification of construction site discharges and reporting of the discharges to town staff with inspection and enforcement training to eliminate the discharges.

3.4 POST-CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

3.4.1 REQUIRED ELEMENTS

Part III.B.4.(a)(1) of the Small MS4 General Permit states:

> *"All permittees shall develop, implement and enforce a program, to the extent allowable under state, federal, and local law, to control stormwater discharges from new development and redeveloped sites that discharge into the small MS4 that disturb one acre or more, including projects that disturb less than one acre that are part of a larger common plan of development or sale.*"
>
> "*Existing permittees shall assess program elements that were described in the previous permit, and modify as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP."*

The first paragraph from Part III.B.4.(a)(2) of the Small MS4 General Permit states:

"All permittees shall use, to the extent allowable under state, federal, and local law and local development standards, an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects."

The SWMP is required to include an ordinance or other regulatory mechanism to regulate discharges from new development and redevelopment projects. The Small MS4 General Permit specifically requires the MS4 operator to:

- establish, implement, and enforce a requirement for the design, installation, implementation and maintenance of structural and non-structural BMPs for new development and redevelopment sites;
- document and maintain records of enforcement actions related to post-construction BMPs;
- provide a long-term operation and maintenance of post-construction stormwater control measures; and
- document operation and maintenance of post-construction stormwater control measures.

Written procedures will be updated as discussed in the BMPs (Section 3.4.2) and on the schedule in the Measurable Goals (Section 3.4.3). The written procedures will be maintained on-site or in this SWMP and made available for inspection by the TCEQ.

3.4.2 BEST MANAGEMENT PRACTICES

3.4.2.1 ORDINANCE REQUIRING RETENTION (BMP 4-1)

Section 811 of Zoning Ordinance No. 0102 (Appendix C) and Section 5.17.4 of Subdivision Ordinance No. 0035 (Appendix D) currently require developments to account for stormwater discharges via retention structures. The retention must be designed with capacity to hold both the volume of stormwater generated by a one percent probability storm event and a 10-year accumulation of silt. Commercial developments and redevelopments are required to provide on-site stormwater retention. Residential subdivisions are required to provide stormwater retention within the subdivision for stormwater runoff from the lots in the subdivision. The Town Engineer and in house staff reviews commercial and residential subdivision development plans for the town to verify that grading and drainage plans include the required retention.

3.4.2.2 CONSTRUCTION INSPECTION OF RETENTION STRUCTURES (BMP 4-2)

During construction, Horizon City's construction inspector does not accept the development or redevelopment as final unless the retention structure is constructed according to the plans. In addition to refusing to accept infrastructure that is not built according to plans, Horizon City can require a security bond or withhold plat approval for public structures and can withhold the certificate of occupancy on private structures. Horizon City will review and update the written procedures for documenting the inspections and enforcement actions used when structures are not built according to the plans reviewed and accepted by the town. Enforcement actions taken resulting from an ordinance violation will be maintained on-site and made available to the TCEQ.

3.4.2.3 RETENTION STRUCTURE INVENTORY (BMP 4-3)

Horizon City will review and update the mapped retention structures which are similar to mapping of the outfalls within the town's limits (BMP 2-2). Mapping will be updated by locating the retention structures on an aerial image of the town, with structures being identified

by the legal description of the property on which they are located. The map will be used as an inventory of the post-construction structural controls to facilitate structure inspection and maintenance.

3.4.2.4 MAINTENANCE OF PRIVATE RETENTION STRUCTURES (BMP 4-4)

The Zoning and Subdivision Ordinances require owners to maintain private retention structures. The ordinances also provide Horizon City the right to maintain the structure and issue a lien against the property if the owner fails to maintain the structure in a satisfactory manner. In addition, Horizon City will develop a requirement for a maintenance plan to be filed in the real property records of El Paso County for future private retention structures. The maintenance plan will be required to include maintenance schedules and records and to be made available to the town staff for review and inspection. Horizon City ordinances that pertain to maintenance of structural stormwater control measures will be amended to reflect this requirement.

3.4.2.5 MAINTENANCE OF PUBLIC RETENTION STRUCTURES (BMP 4-5)

Most of the retention structures constructed for new development are designated as public. A program has been developed to regularly inspect the public retention structures for maintenance and to perform maintenance on the structures, as needed. Since the retention structures are required to have the capacity for a 10-year accumulation of sediment, inspection and maintenance will be implemented on a 10-year cycle. Written inspection and maintenance procedures for public retention structures will be developed to facilitate long-term operations of the post-construction control measures.

3.4.3 MEASURABLE GOALS

BMP 4-1

The Subdivision and Zoning Ordinances regulate post-construction discharges from development through an enforceable requirement for BMPs. These ordinances are fully implemented; therefore, no measurable goal is needed.

BMP 4-2

- Review and update (if necessary) the procedures for documenting inspections and enforcing requirements when structures are not built according to plans reviewed and accepted by the town (Annually).

Ordinance amendments will give Horizon City the authority to implement enforcement actions for structures that are out of specification. This ensures that all structures accepted by the town are built to maintain stormwater quality and structural integrity for long-term operation.

BMP 4-3

- Review and update the map of public and private retention structures within the corporate limits (Annually).
- By November each year, update the retention structure map with new structures resulting from development.

The retention structure map will facilitate inspections, maintenance, and documentation as described in BMPs 4-2 and 4-5 of this SWMP.

BMP 4-4

- Review and revise, if necessary, the SQPO to meet the requirements of Part III.A.3.(a) of the Small MS4 General Permit (Annually).
- Adopt an SQPO amendment requiring a maintenance plan to be filed in the real property records of El Paso County (November 2023).

The SQPO will regulate post-construction BMP maintenance through an enforceable requirement for long-term operation and reporting.

BMP 4-5

- Review and update the written inspection and maintenance procedures for public retention structures (Annually).

The maintenance program will ensure stormwater quality is preserved and provide for the long-term operation of post-construction BMPs

3.5 POLLUTION PREVENTION / GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

3.5.1 REQUIRED ELEMENTS

Part III.B.5.(a)(1) states:

> *"All permittees shall develop and implement an operation and maintenance program, including an employee training component that has the ultimate goal of preventing or reducing pollutant runoff from municipal activities and municipally owned areas…"*
>
> "*Existing permittees shall assess program elements that were described in the previous permit, modify as necessary, and develop and implement new elements, as necessary, to continue reducing the discharges of pollutants from the MS4 to the MEP."*

The Small MS4 General Permit specifically requires the MS4 operator to:

- develop and maintain an inventory of its facilities and stormwater controls;
- train employees involved in pollution prevention and good housekeeping practices;
- develop procedures for removal and disposal of waste from the MS4;
- require contractors hired by the MS4 to comply with the SWMP and provide contractor oversight to ensure their compliance;
- evaluate operation and maintenance activities for their potential to discharge pollutants; and
- maintain structural control maintenance by the MS4.

The inventory of municipal operations and facilities owned or operated by Horizon City that are subject to the operation, maintenance, and training programs under this MCM follow:

- Park and open space maintenance
- Rights-of-way maintenance
- Storm drainage system maintenance
- Street maintenance

- Building maintenance
- Municipal parking lots and building grounds, Material and equipment storage areas
- Town Hall
- Oz Glaze Senior Center
- Police Station (leased)
- Courthouse (leased)
- Splash Park
- Six parks, including playgrounds and ball fields

The town does not perform bridge maintenance or cold weather operations, such as salting or sanding of roads. Horizon City has no municipally owned or operated industrial activities that are subject to TPDES industrial stormwater regulations.

Written procedures will be updated/developed as discussed in the BMPs (Section 3.5.2) and on the schedule in the Measurable Goals (Section 3.5.3). The written procedures will be maintained on-site or in this SWMP and made available for inspection by the TCEQ.

3.5.2 BEST MANAGEMENT PRACTICES

3.5.2.1 POLLUTION PREVENTION MEASURES (BMP 5-1)

Horizon City currently owns two buildings, the Town Hall and the Oz Glaze Senior Center. The town leases a third building for its police department and municipal court. The town's maintenance facility is limited to a small, walled storage yard and metal premanufactured shed next to the Town Hall. The town owns and operates six parks.

Horizon City will review the inventory of its operational activities and facilities and identify those that have a potential to negatively impact stormwater quality. For each activity or facility with a potential impact to stormwater, the potential pollutants will be identified and written pollution prevention measures will be developed and implemented to control the pollutants. The measures will include good housekeeping procedures and BMPs.

Written procedures will be developed for annual inspections of municipal operations and facilities to identify new substances or operations that could be potential pollutant sources and to verify that existing measures are effective in preventing and reducing pollutants in stormwater runoff. The pollution prevention measures will be revised as needed based on results of the inspections.

Horizon City employs maintenance workers whose duties include, but are not limited to, removal of sediment, floatables (trash), and debris from public rights-of-way and drainageways. The removal is done prior to mowing, when problems are observed, and when complaints are received. A work order system has been developed to schedule cleaning of the public retention structures and to track the amount of illicit material eliminated from the MS4. The work order system will be expanded to allow the tracking of illicit material eliminated and expansion of infrastructure cleaning to include inverts, culverts, flumes, etc.

Much of the material found in the MS4 is deposited by wind or is litter from the general population; however, material may be found dumped in bulk or repeatedly discharged from a

single source. During infrastructure cleaning, the maintenance workers will look for evidence of material being discharged from an identifiable source, such as a flume with packaging material in it behind a shopping center. If a potential source of the discharged material can be identified, the workers will notify a building inspector or code officer, as appropriate, for investigation and enforcement actions under the SQPO to eliminate the illicit discharge.

Material removed from the MS4 will be disposed of in accordance with BMP 5-4.

3.5.2.2 EMPLOYEE TRAINING AND EDUCATION (BMP 5-2)

Municipal employees who have the potential to impact stormwater quality during the performance of their duties will annually receive at least 1 hour of training on the pollution prevention measures specific to their duties. The training will cover the employee activities necessary to implement BMPs for other MCMs, which include but are not limited to, the following:

- Distribution of educational materials (BMP 1-1)
- Response to citizen reports of stormwater concerns (BMP 1-6)
- Elimination of illicit discharges by ordinance enforcement (BMP 2-1)
- System inspections (BMP 2-4)
- Construction site inspections (BMP 3-3).
- Construction inspection of retention structures (BMP 4-2)
- Maintenance of public retention structures (BMP 4-5)
- Pollution prevention measures (BMP 5-1)

The MS4 Program Manager will be responsible for providing the training or obtaining outside sources to assist with the training.

3.5.2.3 CONTRACTORS SWMP COMPLIANCE (BMP 5-3)

Contractors hired by Horizon City to perform maintenance activities will be contractually required to comply with all stormwater control measures, pollution prevention measures, and facility-specific stormwater management operating procedures. The town's employees will oversee contractor activities to ensure appropriate standard operating procedures and control measures are being utilized. Written contract clauses and procedures will be developed to ensure contractors abide by all of the SWMP requirements that are applicable to their work.

3.5.2.4 WASTE DISPOSAL PROCEDURES (BMP 5-4)

The review of operational activities and facilities, BMP 5-1, will include identification of wastes generated by MS4 maintenance and other municipal operations. Written disposal procedures will be developed for each waste stream and will include information on waste handling, storage, and proper disposal. The procedures will be part of the employee training under BMP 5-2.

Horizon City will expand its waste tracking system to quantify the types of waste disposed of each year. The potential waste streams from municipal operations include sediment, floatables (trash), organic debris, and other material removed from the MS4 infrastructure. Written procedures will be developed to track the types and quantities of waste removed from the MS4.

These records will be compared to the high-priority education issues to determine if adjustments to the issues are needed.

3.5.2.5 VEHICLE MAINTENANCE (BMP 5-5)

Horizon City operates a fleet of police cars and light-duty maintenance trucks. No maintenance or washing of the vehicles is allowed on municipal property. Instead, vehicles are taken to authorized, commercial maintenance and wash facilities with appropriate treatment, recycling, and disposal procedures for waste.

Parking areas for fleet vehicles are inspected during grounds maintenance for signs of fluid leaks. If a vehicle is found to be leaking, a drip plan is placed under it to contain the leak. The vehicle is then taken for maintenance as soon as practicable.

3.5.3 MEASURABLE GOALS

BMP 5-1

- Develop written pollution prevention measures for municipal operations and facilities (November 2020).
- Review and update the written procedures for performing and documenting annual self-inspections (November 2020).
- Starting in 2020, conduct self-inspections annually by April to determine if the pollution prevention measures are effective and sufficient.
- Expand the work order system to include maintenance of MS4 infrastructure other than retention structures by November 2023.

Implementing pollution prevention measures for municipal operations and facilities is intended to prevent or reduce pollutants entering stormwater. Self-inspections assist in monitoring the effectiveness of the procedures and practices so that modifications can be implemented as needed. An orderly system for inspecting and cleaning the MS4 provides opportunities to detect and eliminate illicit material from the MS4. The tracking system provides a method to evaluate success of programs and procedures that have been or will be developed and implemented.

BMP 5-2

- By November each year, conduct 1-hour of in-house pollution training on prevention measures relevant to employees' duties.
- Develop a written program to identify and track employee training and training topics needed for each employee, based on their operational activities and SWMP duties (April 2020).

Training municipal employees in the impact their actions can have on stormwater quality has the potential to decrease the discharge of pollutants from municipal operations. Both municipal operation BMPs and the BMPs for the other MCMs are more likely to be effective when the employees are trained and have an understanding of the activities needed to successfully implement the BMPs.

BMP 5-3

- Develop contract clauses and written procedures for ensuring that Horizon City's contractors comply with requirements established by the SWMP (November 2019).

Contractor oversight by the MS4 ensures that measures described in this SWMP are utilized to the MEP for all projects under control of the municipality.

BMP 5-4

- Develop written procedures for handling, storing, and disposing waste removed from the MS4 (November 2022).
- Develop written procedures to track the types and quantities of waste removed from the MS4 (April 2023).

Developing and implementing waste disposal procedures will prevent waste from being discharged into the MS4.

BMP 5-5

The vehicle maintenance program will reduce the incidence of fleet vehicles becoming a source of stormwater pollutants. Maintenance activities on municipal fleet vehicles are performed at authorized commercial facilities only; therefore, no measurable goal is needed.

3.6 INDUSTRIAL STORMWATER SOURCES

The requirements described for the sixth MCM in Part III.B.6 of the Small MS4 General Permit, under Industrial Stormwater Sources are only applicable to Level 4, small MS4s. Horizon City is classified as a Level 2, small MS4; therefore, the sixth MCM is not applicable to this SWMP.

3.7 AUTHORIZATION FOR MUNICIPAL CONSTRUCTION ACTIVITIES

3.7.1 REQUIRED ELEMENTS

The introductory paragraph from Part III.B.7 of the Small MS4 General Permit states:

> *"Permittees that choose to develop this measure will be authorized to discharge stormwater and certain non-stormwater from construction activities where the MS4 operator meets the definition of construction site operator in Part I of this General Permit."*
>
> *"The authorization to discharge under this MCM is limited to the regulated area, such as the portion of the small MS4 located within a UA or the area designated by TCEQ as requiring coverage. However, an MS4 operator may also utilize this MCM over additional portions of their MS4 that are also in compliance with all of the MCMs listed in this General Permit."*

Horizon City is the construction site operator for small or large construction projects where they either have operational control over construction plans and specifications or have day-to-day operational control of activities at a construction site. Implementation of this MCM requires the town to develop and implement a SWP3 in accordance with Part VI of the Small MS4 General Permit for each construction project that disturbs 1 or more acre of land or is part of a common plan of development that disturbs 1 acre or more of land.

3.7.2 DESCRIPTION OF CONSTRUCTION ACTIVITIES

Construction activities covered under this SWMP for Horizon City may consist of, but are not limited to, the following:

- Road construction
- Park facilities
- Recreation facilities
- Landscaping
- Sidewalk construction
- Paving
- Expansion of the existing Town Hall
- Construction of new municipal facilities
- Construction of a new police department building

These construction activities will be conducted in a manner appropriate for construction projects in an arid climate with desert soil types and vegetation.

3.7.3 AREA COVERED BY THE MUNICIPAL CONSTRUCTION ACTIVITIES MCM

Horizon City has elected to implement the seventh MCM for municipal construction activities within the entire corporate limits of the town *not* just the urbanized area. All SWMP activities will be implemented within the corporate limits (Figure 1).

3.7.4 OVERSIGHT OF CONTRACTOR ACTIVITIES

Horizon City is implementing this MCM in lieu of seeking coverage for its construction activities under the TPDES CGP. Municipal construction activities will be covered under the Small MS4 General Permit where the town is the operator. When a contractor is hired to have day-to-day operational control of the construction activity, the contractor will *not* be covered under the Small MS4 General Permit and will need to obtain separate coverage under the CGP.

The following procedures will be implemented to ensure that contractors have separate authorization for stormwater discharges:

- Horizon City will place language in construction contracts requiring drafting and implementation of a SWP3. The contract documents will also require the contractor to complete and submit an NOI to the TCEQ under the CGP. These documents must be submitted to the TCEQ and Horizon City before the town will issue a Notice-to-Proceed with construction.
- The town will maintain a copy of the contractors' NOIs and Construction Site Notices and the SWP3s for its construction activities. The contractor will be wholly responsible for the SWP3 implementation.
- The Director of Public Works, with the City Planner as the alternate, will be responsible for ensuring contractor compliance.

- Horizon City inspectors will conduct construction site inspections to verify compliance with the SWP3.

3.7.5 SWP3 DEVELOPMENT

For each construction activity that will disturb 1 acre or more or is part of a common plan of development, Horizon City will include preparation of a SWP3 in the scope of work when hiring an engineer to prepare contract plans and specifications. The SWP3 will be developed in accordance with Part VI of the Small MS4 General Permit. The SWP3 will address the site-specific issues associated with each construction activity. The town may utilize SWP3 guidance and examples from sources such as the EPA and TCEQ for preparation of their SWP3s.

3.7.6 RECORDS

Records of municipal construction activities authorized under this optimal MCM, in accordance with Part VI of this general permit, will be maintained. At this time, there has been only one municipal construction activity since February 1, 2008. The total area disturbed was less than 1 acre.

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4.0 GENERAL REQUIREMENTS

4.1 REVISING THE SWMP

If the SWMP requires modification prior to NOI and SWMP approval by the TCEQ, the town will submit the changes to the TCEQ in a letter providing supplemental information to the NOI. Changes to the SWMP after TCEQ approval of the NOI and SWMP require written approval from the TCEQ.

The following types of changes may be made by the town without written approval from the TCEQ as long as a Notice of Change (NOC) is submitted to the TCEQ:

- Adding components, controls, or requirements to the SWMP or replacing a BMP with an equivalent BMP
- Replacing a less effective or infeasible BMP specifically identified in the SWMP with a more effective BMP

The NOC must be accompanied by an explanation as to why the BMP was eliminated, an explanation of the effectiveness of the replacement BMP, and why the replacement BMP is expected to achieve the goals of the replaced BMP.

4.2 RECORDKEEPING

Horizon City will retain all records, a copy of the Small MS4 General Permit, and records of all data related to NOI and public participation requirements for at least 3 years or for the remainder Small MS4 General Permit term, whichever is longer. If an administrative or judicial enforcement action is instituted against the town in relation to the Small MS4 General Permit, then these records must be kept until final disposition of the action.

Horizon City will submit records to the TCEQ only when specifically asked to do so; however, the SWMP will be retained at a location accessible to the TCEQ. Horizon City will also make the NOI and the SWMP available to the public if requested to do so in writing. Copies of the SWMP will be made available within 10 working days upon receipt of a written request.

Records of activities to implement BMPs will be kept readily available for the preparation of annual reports as required by the Small MS4 General Permit. Ongoing activities will be tracked by numbers appropriate for the activity, such as cubic yards of waste/debris from the MS4 that are transported to an approved landfill. Documentation of activities will be essential to verifying BMPs have been implemented and should start immediately for all ongoing activities.

4.3 REPORTING

4.3.1 GENERAL REPORTING

In accordance with Part IV.B.1(a) of the Small MS4 General Permit, Horizon City shall report any noncompliance (either orally or via electronic transmission) that may endanger human health, human safety, or the environment to the TCEQ within 24 hours of discovery. The town shall also provide a written report to the TCEQ Region 6 Office and the TCEQ Enforcement Division (MC-224) within 5 working days of discovery of noncompliance. This written report shall contain:

- a description of the noncompliance and its cause;

- the potential danger to human health or safety, or the environment;
- the period of noncompliance, including exact dates and times;
- if the noncompliance has not been corrected, the anticipated time it is expected to continue; and
- steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance, and to mitigate its adverse effects.

If the town discovers that it failed to submit complete and accurate information or submitted incorrect information in any report, the town shall promptly submit the updated information to the executive director.

4.3.2 ANNUAL REPORTING

Horizon City is required to submit an annual report to the TCEQ within 90 days of the end of each reporting year. Part IV.B.2 of the Small MS4 General Permit states: *"For the purpose of this section, the reporting year may include either the permit year, the permittee's fiscal year or the calendar year, as elected by the small MS4 and notified to the TCEQ in the application submittal."* Horizon City has elected to report based on the calendar year; therefore, the first annual report is due March 31, 2020, whether or not the NOI and SWMP have been approved by the TCEQ. The first annual report will cover SWMP activities from August 1, 2018, to December 31, 2019. Subsequent annual reports will cover SWMP activities from January 1 to December 31 of each calendar year and are due 90 days after December 31.

Part IV.B.2 of the Small MS4 General Permit contains a detailed list of items that must be included in the annual report. This list includes, but is not limited to, the following items:

- A statement of the town's compliance with the Small MS4 General Permit
- An evaluation of the effectiveness of the BMPs that have been implemented
- The status of any additional BMPs implemented by the town
- An assessment of the success of the measurable goals for each of the MCMs
- Review of the progress made toward reducing the discharge of pollutants to the MEP
- A summary of the collected and analyzed information, if any, used to track the success of the program
- Documentation of activities and materials that demonstrate the amount of resources used for public education of residents, visitors, public service employees, businesses, commercial and industrial facilities, and construction site personnel
- The number of municipal construction projects authorized under MCM 7 of the Small MS4 General Permit and the total number of acres disturbed
- The number of non-municipal construction notices that the town received for construction activities within its limits
- A description of any agreements that the town has for another government body to satisfy some of its permit obligations

- A summary of the stormwater activities that the town is going to implement during the next reporting cycle
- Proposed changes to the SWMP, BMPs or measurable goals

The annual report shall be submitted to the TCEQ Stormwater & Pretreatment Team (MC-148) in Austin as well as the TCEQ Region 6 Office in El Paso. Horizon City will also make a copy of the annual report readily available for review by TCEQ personnel upon request.

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5.0 SUMMARY

Horizon City prepared this SWMP in accordance with the requirements and conditions set forth in Part III of the Small MS4 General Permit issued January 24, 2019. The town will submit this SWMP with the NOI to the TCEQ to authorize MS4 discharges under the Small MS4 General Permit. Horizon City has elected to implement this SWMP within the entire corporate limits of the town *not* just the UAs (Figure 1).

This SWMP includes the six MCMs required by definition of MEP as it applies to reducing the discharge of pollutants from **Level 2**, Small MS4s. Horizon City has also elected to implement the optional seventh MCM for Municipal Construction Activities. The town will continue to operate under the conditions of the previous permit and existing SWMP until this revised SWMP and NOI are approved.

This SWMP includes a schedule of activities that are necessary to meet the measurable goals for each MCM. Implementing the BMPs and meeting the measurable goals for each MCM listed on the schedules are essential to satisfy the requirements set forth in Part III of the Small MS4 General Permit. The second paragraph from Part III of the Small MS4 General Permit states: *"A permittee that implements BMPs consistent with the provisions of their permit and SWMP constitutes compliance with the standard of reducing pollutants to the MEP and will be deemed in compliance with Part III of this permit."* Table 1 through Table 5 summarize the BMPs, measurable goals, and implementation schedules for MCMs 1 through 5, respectively. No schedule is presented for MCM 6, as it is not applicable to the Town of Horizon City. The optional seventh MCM for Municipal Construction Activities will be implemented whenever the town undertakes a construction activity that disturbs 1 acre or more of soil or that is part of a common plan of development that disturbs 1 acre or more of soil.

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