

**EL PASO COUNTY TEXAS POLLUTANT DISCHARGE ELIMINATION  
SYSTEM (TPDES) MANAGEMENT PROGRAM**

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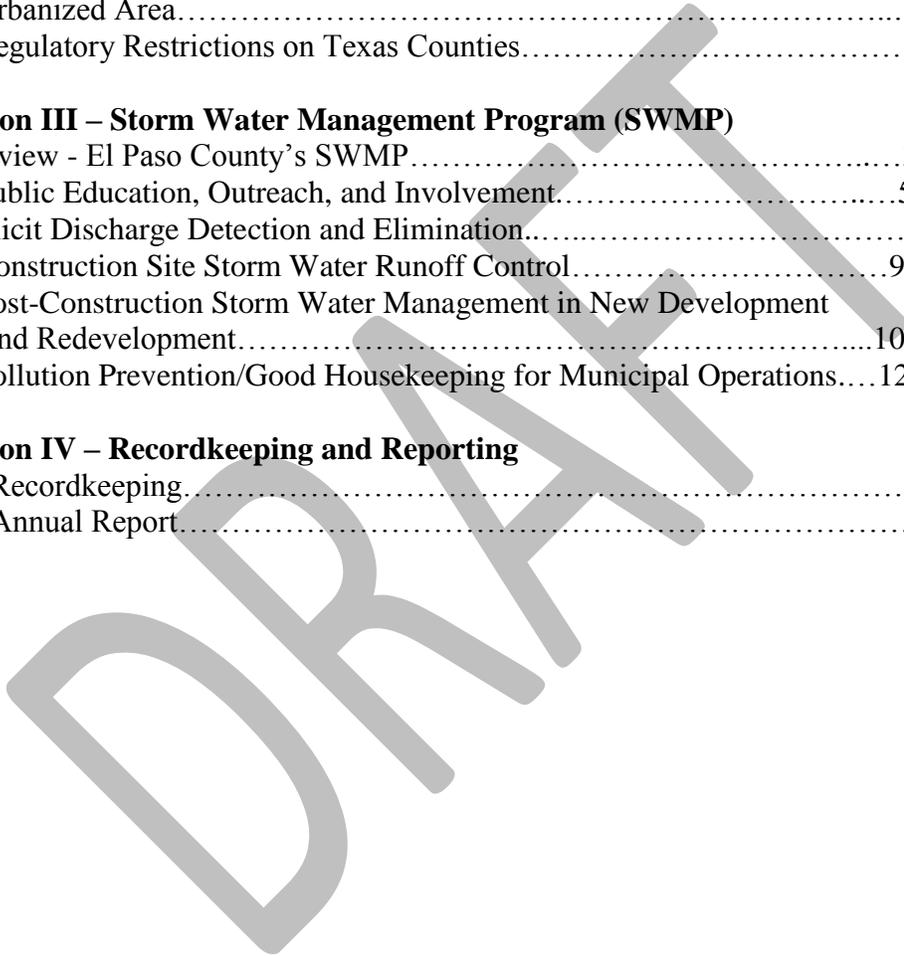
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## SECTION 1 – OVERVIEW

### I. 1 – Storm Water Rule Overview

Phase 1 of the U.S. Environmental Protection Agency’s (EPA) municipal storm water program started in 1990 under the authority of the Federal Clean Water Act (CWA). Phase 1 relies on National Pollutant Discharge Elimination System (NPDES) permit coverage to address pollutants from storm water runoff and dry weather discharges. Phase 1 permits are required for large and medium municipal separate storm sewer systems (MS4S), serving populations of 100,000 or greater.

The Storm Water Phase 2 Final Rule (promulgated December 8, 1999) was approved by EPA to prevent water resources from pollution by storm water runoff and dry weather discharges into storm drain systems. Local governments are required by Phase 2 regulations to implement programs and practices to control water pollution, to the “maximum extent practicable” (MEP) in urbanized areas of small MS4s (population less than 100,000). Phase 2 requires local governments to obtain a permit those implements six “minimum control measures”, as applicable. The six minimum control measures (MCM’s) are: public education, outreach, and involvement; illicit discharge detection and elimination; construction site stormwater runoff control; post-construction stormwater management in new development and redevelopment; pollution prevention and good housekeeping operations; and industrial stormwater sources. Program elements for the sixth MCM (industrial stormwater sources) are not applicable for El Paso County since it is classified as a Level 2 small MS4 operator.

EPA has authorized the Texas Commission on Environmental Quality (TCEQ) to issue and enforce the Texas Pollutant Discharge Elimination System (TPDES) Phase 1 and 2 storm water permits, in lieu of federal NPDES permits. Effective 8/13/2007 TCEQ Commissioners approved the TPDES General Permit to authorize discharge of storm water from regulated Phase 2 MS4s.

On February 2008, El Paso County submitted a Notice of Intent (NOI) to TCEQ for general permit coverage. The TPDES Small MS4 General Permit (TXR040000, Issued and Effective on August 13, 2007) was issued to El Paso County with an expiration date of August 13, 2012. Before June 11, 2014, El Paso County and other operators of small MS4s that were covered under the previous TPDES general permit for small MS4s must reapply for permit coverage. The application must include a NOI for coverage and a Storm Water Management Program (SWMP). The NOI is a document that provides TCEQ with an official notification to seek permit coverage and identifies legally responsible parties for permit enforcement. The SWMP will describe actions that will be implemented by the permittee, to address the required elements of a storm water program. The SWMP describes in detail which Best Management Practices (BMPs) will be implemented to meet permit requirements. The permit term will cover 5 years (8/13/13-8/12/18). The permit will be renewed at 5 year intervals, which may require significant changes to the SWMP for future permit approvals, if necessary.

## **SECTION II – PERMIT APPLICABILITY AND COVERAGE**

### **II. 1 Urbanized Areas**

The TPDES Permit requirements apply only to the portions of unincorporated El Paso County that are identified as urbanized areas. There are approximately 9 non-contiguous urbanized areas in unincorporated El Paso County. TPDES General Permit recognizes the urbanized areas as determined by the 2000 or 2010 Decennial Census by the U.S. Bureau of Census. The 2000 and 2010 urbanized area maps may be viewed at <http://www.census.gov/geo/maps-data/maps/ua2kmaps.html> and <http://www.census.gov/geo/maps-data/maps/2010ua.html>, respectively.

### **II.2 Regulatory Mechanism Restrictions for Counties**

The Texas Constitution and State statutes do not grant Texas counties the ability to create and enforce ordinances, such as home rule cities which are allowed to create ordinances to meet the TPDES permit requirements. To address this restriction, TCEQ rules contain text stating “to the extent allowable under state and local law”. This statement is cited several times in Part III, SWMP development and implementation, of the general permit. El Paso County will address the various elements in the General Permit SWMP requirements to the extent allowable under current state and local law.

## **SECTION III – STORM WATER MANAGEMENT PLAN (SWMP)**

### **Overview of El Paso County’s SWMP**

To the extent allowable under State and local law (see II.2 above), El Paso County’s SWMP was developed and will be implemented according to requirements of Part III of TPDES General Permit TXR040000, for discharges of storm water to surface water in the state. This SWMP was developed to prevent pollution in storm drainage systems to the maximum extent practicable, with control measures implemented during the permit term. The SWMP addresses six minimum control measures (MCMs) as required by TCEQ rules, as applicable. Program elements for the sixth MCM (industrial stormwater sources) are not applicable for El Paso County since it is classified as a Level 2 small MS4 operator. MCMs will be implemented in urbanized areas of unincorporated El Paso County and may be implemented in other unincorporated areas adjacent to urbanized areas of El Paso County if warranted by special conditions. MCMs will be evaluated based upon the accomplishment of activities (BMPs) listed under each MCM. El Paso County storm water staff from the Public Works department will monitor MCM activities.

### **Legal Authority (Contrast with Cities)**

Unlike cities, counties are not authorized by the State Constitution or State Statutes to enact the ordinances and implement all of the regulatory requirements that Phase 2 (small MS-4) requires. El Paso County addresses “to the extent allowable under state and local law” in appropriate MCM sections.

**Ditch Drainage System**

El Paso County’s storm drainage system is mostly comprised of unlined (pervious) above ground ditches. Benefits and challenges associated with this type of system will be addressed in the Section III.5 of this document.

**Large Area and Long Distances between Non-Contiguous Urbanized Areas**

El Paso County has approximately 9 small non-contiguous Urbanized Areas scattered across El Paso County area. Long travel distances, often exceeding those found in large MS-4 cities will require MS-4 County staff to travel great distance in order to implement daily activities associated with this program. This extra challenge is another element to consider when comparing the SWMPs of El Paso County to cities in this area.

**Annexation and De-annexation**

El Paso County will be losing land areas when annexation occurs. El Paso County will not be adding new areas of responsibilities and will not have to provide services to the annexed land. El Paso County will only add urbanized areas when population densities increase in existing unincorporated county, as designated by the U.S. Census Bureau on a ten year cycle.

**Participants in developing/implementing El Paso County’s SWMP**

El Paso County’s SWMP was developed by County staff with storm water experience. Responsibilities for implementation of the SWMP will be handled by the Public Works department.

**Staff Contacts:**

**Ernesto Carrizal III, P.E.**

Public Work Director  
County of El Paso  
Public Works Department  
800 E. Overland Ave., Rm 407  
El Paso, Texas 79901  
Phone: (915) 546-2015  
Email: [ecarrizal@epcounty.com](mailto:ecarrizal@epcounty.com)

**Norma Palacios**

Assistant Public Works Director  
County of El Paso  
Public Works Department  
800 E. Overland Ave., Rm 407  
El Paso, Texas 79901  
Phone: (915) 546-2015  
Email: [npalacios@epcounty.com](mailto:npalacios@epcounty.com)

**Gilberto Saldaña Jr., P.E.**

Sr. Civil Engineer  
County of El Paso  
Public Works Department  
800 E. Overland Ave., Rm 407  
El Paso, Texas 79901  
Phone: (915) 546-2015  
Email: [gsaldana@epcounty.com](mailto:gsaldana@epcounty.com)

**Section III.1 – Public Education, Outreach, and Involvement MCM #1**

The public will be informed about water quality issues regarding storm water runoff and illicit discharges by providing informational materials in multiple formats and media. El Paso County and other resources may be used to develop and distribute public education and outreach material. El Paso County will work with other government agencies to develop suitable community materials for website posting and/or distribution at El Paso County Administrative Office (MDR Building), Road & Bridge warehouse and El Paso County web page. El Paso County will rely upon compliance with public notice requirements regarding public meetings at El Paso County Commissioners' Court to receive public input into storm water program development and implementation. Also the Draft 2013-2018 SWMP will be posted on the County Website as submitted to TCEQ for TPDES General Storm Water Permit coverage.

The community to be addressed will consist of residents, public service employees, businesses, commercial/industrial facilities and construction site personnel in unincorporated/urbanized areas of El Paso County. These areas are mostly residential in nature and not intended to attract visitors.

**(a)BMP, Measurable Goal and Date – Educational Material and Distribution**

El Paso County will distribute storm water related materials at 3 or more County buildings. Examples include such items as information sheets, brochures, bookmarks, etc. These materials may be developed by El Paso County staff, EPA, TCEQ, or any other source. Some of these materials will address illicit discharges, construction, NOI submittals and other information materials required by the permit. Additionally El Paso County may elect to use materials that are intended for TV or radio broadcasts, if such materials are affordable. Also El Paso County may participate in regional storm water education projects to supplement or replace (if the regional activities are more effective or reach a larger audience) this BMP and will report activities in the annual report.

Goal and Date: At least 500 copies will be distributed annually throughout the life of the new permit. TV or radio broadcasts may substitute for 500 hundred copies.

Status: **Accomplished & Ongoing**

**(b)BMP, Measureable Goal and Date – Outside Participation**

Participate with other organizations in order to develop storm water educational materials which can be used by MS-4s in the West Texas region. Any materials developed by such organizations will be reviewed by El Paso County staff and may be used during appropriate times throughout the permit term.

Goal and Date: Document participation with other organizations. Participation will continue throughout the permit term.

Status: **Accomplished & Ongoing**

**(c)BMP Measureable Goal and Date – Public Service Websites**

Post storm water information on the El Paso County website:

<http://www.epcounty.com/publicworks> El Paso County Public Works

Department will also provide links to the TCEQ, EPA and storm water websites.

**Goal and Dates:** The El Paso County Public Works website is active and contains storm water information. The sites will be reviewed annually to determine if content revisions are needed.

**Status: Accomplished & Ongoing**

**(d) BMP, Measureable Goal and Date – Public Notice for Meeting**

El Paso County Commissioner's Court is subject to state/local public notice requirements, which meet TCEQ minimum requirements for public involvement/participation.

**Goal and Date:** Staff will verify that Commissioner's Court meetings comply with public notice requirements and include that information in the annual reports to TCEQ. Public notice for meetings is already in effect and will continue throughout the life of the new permit.

**Status: Accomplished & Ongoing**

**(e) BMP, Measureable Goal and Date – Post Draft SWMP on Website**

After internal review by El Paso County Officials, staff will post the draft 2013-2018 SWMP on the County's website.

**Goal and Draft:** Staff will post the Draft 2013-2018 SWMP on the County Website as submitted to TCEQ for review and approval.

**Status: Accomplished**

**(f) BMP, Measureable Goal and Date – Public Notice in Newspaper**

After reviewing El Paso County's NOI and SWMP, TCEQ will issue "the executive director's preliminary determination". This public notice must be published by El Paso County at least once in the largest circulated newspaper in the county. In addition, this public notice must provide an opportunity for the public to submit comments on the NOI and SWMP and request a public meeting. A public meeting will be held if the TCEQ determines there is sufficient interest.

**Goal and Date:** Publish TCEQ Executive Director's Preliminary Determination in the El Paso Times, including information about public comment and public meeting request within 30 days after being notified by the TCEQ Office of Chief Clerk.

**Status: Not Started**

**Section III.2 – Illicit Discharge Detection and Elimination MCM #2**

To the extent allowable under State law, El Paso County will develop and implement an illicit discharge program. Illicit dischargers that El Paso County cannot enforce against, after seeking voluntary compliance, will be referred to the TCEQ Region Office in El Paso. Malfunctioning on-site sewage facilities, such as septic systems, are subject to County corrective actions and enforcement, as necessary.

The actual structure of the MS4 system will impact the development of the MCM. El Paso County's MS-4 is composed mostly of open drainage ditches, which means that illicit connections/discharges to underground systems are not as hidden or difficult to find in open drainage ditch systems that are located in many counties. Also, dry weather flows are not as common in ditch systems since they are not lined in concrete and water is absorbed into the ground, while also being exposed to wind and sunlight. Last, outfalls are not commonly found in a ditch system compared to an underground pipe system which discharges into outfalls.

El Paso County will accept the TCEQ list of allowable non-storm water discharges in the MS-4. These non-storm water sources may be discharged from the MS-4 and are not required to be addressed in the MS-4's Illicit Discharge and Detection MCM or other MCM's. This is provided that they have not been determined by the MS-4 to be substantial sources of pollutants to the MS-4. A list of the allowable discharges is contained in the TCEQ Fact Sheet and Executive Director's Preliminary Decision, TXR040000.

**(a) BMP, Measureable Goal and Date – Detection: Monitoring Drainage System**

Illicit discharge detection will be accomplished by visually monitoring outfalls or other locations within drainage ditch systems for indicators of illicit discharges or water pollution. When deemed appropriate by staff, chemical testing or toxicity testing (minnow in a bottle) may also be performed to confirm the presence of an illicit discharge.

Goal and Date: Outfalls and/or other locations within drainage ditch system locations will be visually monitored. This activity will continue throughout the life of the new permit.

Status: **Accomplished & Ongoing**

**(b) BMP, Measureable Goal and Date – Detection & Correction: Citizen Reports and County Staff Surveillance.**

Illicit discharge, complaints from citizens will be investigated by staff. Voluntary compliance will be requested due to the County's limited enforcement powers. TCEQ's Region Field Office will be notified of illicit discharges that do not comply voluntarily.

Goal and Date: Citizen reports and staff discovery of illicit discharges in unincorporated urbanized areas will be investigated within 2 weeks. This activity will continue throughout the life of the new permit.

Status: **Accomplished & Ongoing**

(c) BMP, Measureable Goal and Date – Correction: On-Site Sewage Facilities.

The El Paso County staff will maintain records, for the storm water program of actions taken regarding malfunctioning on-site sewage facilities. El Paso County On-site Sewage department will enforce the rules regarding the installation and operation of on-site sewage facilities.

Goal and Date: Software has been obtained and used to track corrective actions taken regarding on-site sewage facilities and will continue throughout the life of the new permit.

Status: **Ongoing**

(d) BMP, Measureable Goal and Date: - Detection: Storm Drainage Map

El Paso County will use a map of urbanized areas in unincorporated El Paso County that depicts outfalls contained in those areas that discharge directly into waters of the US, using available resources such as EPA Urbanized Area maps, TCEQ website: [www.tceq.state.tx.us/comm\\_exec/forms\\_pubs/pubs/gi/gi-316/](http://www.tceq.state.tx.us/comm_exec/forms_pubs/pubs/gi/gi-316/), 7.5 minute USGS topographic maps, El Paso County's GIS maps, and/or other readily available resources.

Goals and Dates:

Resources have been identified and implemented and will continue to be utilized throughout the life of the new permit.

Status: **Ongoing**

(e) BMP, Measureable Goal and Date - Detection & Correction: Illegal Dumping

**Team.** The El Paso County Sheriff's Department in conjunction with the County Attorney's environmental section will investigate illegal dumping in the county. Storm water staff will coordinate with the Sheriff's Department and the County Attorney's Office to report annual activities (number of illegal dumping cases, cases investigated, violations identified or not, cleanups, enforcement actions, etc) that occurred in the county's storm water drainage right of ways.

Goals and Date: Document activities and include findings in the annual report and will continue throughout the life of the new permit.

Status: **Ongoing**

(f) BMP, Measureable Goal and Date – Detection & Correction: Inspections and Response to Complaints.

El Paso County Sheriff's Dept. in conjunction with the County Attorney's Environmental Section will offer residents of unincorporated El Paso County the opportunity to report illegal dumping to the County of El Paso. The El Paso County will follow up on reports derived from these calls.

Goal and Date: Continue to document yearly activities throughout the life of the new permit.

Status: **Ongoing**

(g) BMP, Measureable Goal and Date – Employee Training

Continue to provide training programs for County employees who can identify/detect illicit discharges and educate the general public regarding allowable non-storm water discharges in the MS-4

Goal and Date: County field staff will continue to receive illicit discharge detection and elimination training during the life of the new permit.

Status: **Ongoing**

**Section III.3 – Construction Site Storm Water Runoff Control MCM #3**

To the extent allowable under State law, the County will develop and implement a modified construction inspection program in the urbanized areas of unincorporated El Paso County. The County will participate in this MCM by requiring a Storm Pollution Prevention Plan as part the documents to be reviewed prior to the commencement of construction. The County will also provide general information about the TCEQ requirements to construction site operators, conducting voluntary reactive and proactive inspections and maintaining a file of Notice of Intent (NOI) for operators to be covered under the TCEQ General Storm Water Permit for construction sites. This file will be readily accessible to TCEQ staff. Any required enforcement will be conducted by TCEQ.

(a) BMP, Measurable Goal and Date – NOI File for Construction

The El Paso County has set up a file system for NOIs and CSNs (Construction Site Notices) that are submitted prior to the commencement of construction MCM activities. The file system contains a field that identifies two sections, one for urbanized area NOIs/CSNs and the other for non-urbanized areas. Urbanized areas are determined by using the TCEQ website link to EPA that is described in Section II.2, Urbanized Areas. TCEQ will have access to this file system to obtain information about construction sites in unincorporated areas in the El Paso County.

Goals and Dates: Continue to maintain and update the existing file system throughout the life of the new permit.

Status: **Ongoing**

(b) BMP, Measurable Goal and Date – Public Submittal of Information

The County of El Paso will address public requests of information regarding storm water quality issues associated with construction sites prior to implementing a voluntary construction inspection and enforcement referral program. The County will collect, review and maintain the information. Based on the information collected, the County will either do a voluntary construction site visit to observe conditions and resolve issues, do a referral to TCEQ, conduct periodic site surveys or other appropriate response to address the issue

Goal and Dates: Initial response will be set at 2 weeks, excluding any repeated, unsubstantiated reports regarding a specific site. This activity will continue throughout the life of the new permit.

Status: **Ongoing**

**(c) BMP, Measurable Goal and Date – Site Plan Review**

A Storm water pollution prevention plan is part of the review requirements during the platting and site development review procedures for the County of El Paso. The County of El Paso will address this requirement by providing additional storm water information to developers in the county's approval letters. The updated County's Subdivision Regulations document will address current storm water quality information.

**Goal and Dates:** Language of storm water information will continue to be incorporated into concurrence letters to developers for County's preliminary and final approvals. The County's Subdivision Regulations document will be revised (pending Commissioner Court approval) to address current storm water quality information within the life of the new permit.

**Status:** **Ongoing**

**(d) BMP, Measurable Goal and Date – Site Inspection and Enforcement**

The county will conduct voluntary construction site inspections in unincorporated areas of the County of El Paso. Site operators will be checked for NOI submittal, the presence and adherence of a functional Storm Water Pollution Prevention Plan (SW3P) and general compliance with TCEQ requirements. If there are violations, voluntary compliance will be requested due to the County's limited enforcement powers. If violations have not been corrected after the follow-up inspection, TCEQ will be notified and the County will discontinue its voluntary inspection at that particular site. The County will not perform inspections if entrance to a construction site is denied or the request to review records is denied. TCEQ will be notified of such occurrences immediately and documented in the County's database.

**Goal and Dates:** Voluntary construction site inspections will be conducted throughout the life of the new permit. The number of inspections will be determined based on construction activity in the County of El Paso.

**Status:** **Ongoing**

**(e) BMP, Measureable Goal and Date – Employee Training**

Continue to provide training programs for County employees who are involved with construction inspection and management.

**Goal and Date:** County employees involved with construction inspection and management will continue to receive training for construction site stormwater runoff control during the life of the new permit.

**Status:** **Ongoing**

**Section III.4 – Post Construction Storm Water Management in New Development  
And Redevelopment MCM #4**

The intent of this MCM is to lessen the storm water quality impacts after construction has been completed on new and redeveloped sites of 1 acre or larger (including larger common plan) of disturbed earth and while people occupy and/or use the sites.

Storm Water Management Program  
El Paso County, Texas

To the extent allowable under State law, El Paso County will develop and implement a Post Construction MCM in unincorporated El Paso County, which includes both urbanized and areas adjacent to urbanized areas. Since Texas counties do not have the rule/ordinance making authority that cities have, the County cannot enforce a program to reduce pollutants in post construction storm water runoff at new and redeveloped sites.

The County will participate in this MCM by requiring operators to maintain one hundred percent (100%) of the runoff during and post construction of their project. The County will also allow the use of unlined or pervious drainage ditches and ponds, instead of impervious concrete and underground storm drain pipe systems, which cities typically require.

Compared to impervious underground storm drain pipe systems, above ground open grassy drainage ditch and pond systems allow more storm water runoff to soak into the ground, which reduces downstream runoff velocities (erosion reduction), provides a means of detaining and treating, to a degree, some pollutants (sediment, nutrients/fertilizers, detergents, etc.) and allows illicit discharges to be easier to observe and locate. Drainage ditch and pond systems are usually less costly to install, which provides an obvious incentive for their continued installation during and beyond this permit period.

El Paso County maintains drainage ditches and channels that serve County roads and will continue to do so throughout the permit term. Ditch maintenance data will be provided in the annual report to TCEQ.

**(a) BMP, Measurable Goal and Date – Runoff Control Program**

The County will require operators to submit a one hundred percent (100%) runoff control plan that they will adhere to during and post construction of their project.

**Goal and Dates:** The County of El Paso will conduct semi-annual inspections to ensure that there is no water quality impact after construction. This is currently in effect and will remain in effect throughout the life of the new permit.

**Status:** **Accomplished & Ongoing**

**(b) BMP, Measurable Goal and Date – Pervious Drainage Systems**

El Paso County Road & Bridge Department crew will maintain the open, unlined storm drainage ditches beside County roads in unincorporated areas. This process will allow the drainage system to operate properly and produce storm water quality benefits.

**Goal and Dates:** Provide an annual list of the maintained drainage ditches in the annual report throughout the life of the new permit.

**Status:** **Ongoing**

**(c) BMP, Measurable Goal and Date – Site Inspection and Enforcement**

The county will conduct voluntary post construction site inspections in unincorporated areas of the County of El Paso to ensure compliance with TCEQ

requirements. If there are violations, voluntary compliance will be requested due to the County's limited enforcement powers. If violations have not been corrected after the follow-up inspection, TCEQ will be notified and the County will discontinue its voluntary inspection at that particular site. The County will not perform inspections if entrance to a construction site is denied or the request to review records is denied. TCEQ will be notified of such occurrences immediately and documented in the County's database.

**Goal and Dates:** Voluntary construction site inspections will be conducted throughout the life of the new permit. The number of inspections will be determined based on construction activity in the County of El Paso.

**Status: Ongoing**

**(d) BMP, Measurable Goal and Date – AgriLIFE EXTENSION Program**

El Paso County will support AgriLIFE EXTENSION Program by encouraging new home owners and others in the County to use El Paso County Horticulture and Gardening website link from either the El Paso County's main website or AgriLIFE EXTENSION Program website: <http://elpasotaex.tamu.edu/hg/> to learn earth kind practices. (Earth Kind practices use research-proven techniques to provide maximum gardening and landscape enjoyment while preserving and protecting our fragile environment.) This website addresses gardening, water conservation, recycling and other environmental issues to make our community better.

**Goal and Dates:** Provide support and education on AgriLIFE EXTENSION Program, beginning in Permit Year 1 and continuing through Permit Year 5.

**Status: Ongoing**

**Section III.5 – Pollution Prevention/Good Housekeeping for Municipal Operations**

**MCM #5**

El Paso County will establish a program to conduct its general operations in a manner that prevents or reduces pollution in storm water runoff to the maximum extent practicable. This MCM requires local government to examine multiple internal operations to see if they can be maintained or modified to prevent or minimize storm water pollution or illicit discharge. As stated by TCEQ, examples of local government operations include, but are not limited to: park and open space maintenance; street, road or highway maintenance; land disturbances; parking lots; vehicle and equipment maintenance and storage yards; waste transfer stations; and salt/sand storage locations.

**(a) BMP, Measureable Goal and Date – County Operations Survey**

El Paso County will conduct site surveys of County facilities and discuss issues with the County administration, departmental representatives and/or storm water staff. El Paso County will also identify operation activities that may potentially impact storm water quality or generate illicit discharges by visually monitoring outfalls or other locations within drainage ditch systems for indicators of illicit discharges or water pollution. When deemed appropriate by staff, chemical testing or toxicity testing (minnow in bottle) may also be performed to confirm the presence of an illicit discharge.

Goal and Date: At least 6 locations will be visually monitored annually beginning Permit Year 1.

Status: **Ongoing**

**(b) BMP, Measureable Goal and Date – Detection & correction: County Staff**

**Surveillance**

Operation activities that may potentially impact storm water quality or generate illicit discharges will be investigated by staff and voluntary corrective actions will be taken.

Goal and Date: Staff discovery of activities that may potentially impact water quality will be investigated with 2 weeks. Corrective actions will be addressed immediately. This activity will be performed throughout the life of the new permit.

Status: **Ongoing**

**(c) BMP, Measureable Goal and Date – Proper Waste Disposal**

A report to document the proper waste disposal for County MS-4 related operations or maintenance will be maintained and updated. The report will address dredge spoil, accumulated sediments and floatables (trash and debris in storm drain system).

Goal and Date: The report will be maintained and updated throughout the life of the new permit.

Status: **In Progress**

**(d) BMP, Measureable Goal and Date – Employee Training**

Continue to provide training programs for County employees who have the potential to impact storm water quality.

Goal and Date: County employees with the potential to impact storm water will receive pollution prevention training during the life of the new permit.

Status: **Ongoing**

**(f) BMP, Measureable Goal and Date: - SPCC Plans for County Facilities**

El Paso County will comply with federal spill prevention control and counter measures plan regulations, and review spill response procedures to ensure storm water quality protection measures are considered during spill response. The county will evaluate all of our facilities and determine if Spill Prevention Control and Countermeasures Plans (SPCC) are required. We will develop SPCC plans for our facilities. An annual report on the number of facilities with SPCC plans and current status of each SPCC plan will be documented.

Goal and Date: Verify that an SPCC plan exists per facility and that it is currently appropriate for the facility. If an SPCC plan does not exist or is no longer appropriate for the facility, a new SPCC plan will be developed and implemented. By Year 5, SPCC plans for all county facilities will be current, functional and implemented.

Status: **Ongoing**

## **SECTION IV – RECORDKEEPING and REPORTING**

### **Section IV. A – Recordkeeping**

El Paso County will maintain all records, a copy of the TPDES general permit and all data used to complete the application (NOI) for this permit, for a period of at least three years, or for the term of this permit, whichever is longer. A current/updated copy of the SWMP, NOI and a copy of the permit language/requirements will be maintained at the El Paso County Public Works Department.

El Paso County will make the records, including the NOI and SWMP available to the public, if requested to do so in writing. The SWMP will be available within two working days following the request from the public. Other records will be provided within 10 working days, unless the request required an unusual amount of time or effort to assemble. In which case, Texas law regarding the Public Information Act will be followed. Reasonable charges, in accordance with Texas law, may be levied by the County for researching and preparing any requested material.

### **Section IV.B.2 – Annual Report**

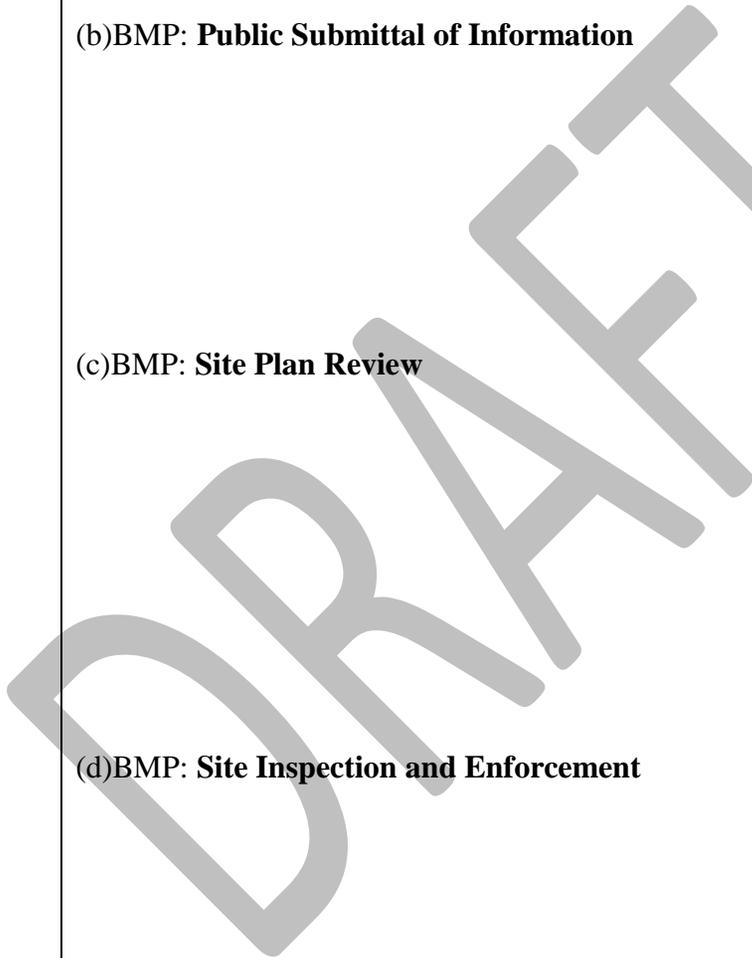
El Paso County will submit a concise report to the Executive Director of TCEQ within 90 days of the end of each permit year. The annual report will address the requirements listed in the TPDES Phase 2 MS-4 general permit rules. The County will also maintain copies of annual reports at the El Paso County Public Works Department.

**EL PASO COUNTY TEXAS POLLUTANT DISCHARGE ELIMINATION SYSTEM (TPDES) MANAGEMENT PROGRAM**  
**Summary of MCMs, BMPs and Measurable Goals**

Minimum Control Measure	Best Management Practices	Measurable Goals
<b>MCM #1, Section III.1:            Public Education, Outreach and            Involvement MCM</b>	(a)BMP: <b>Educational Material and Distribution</b>  (b)BMP: <b>Outside Participation</b>  (c)BMP: <b>Public Services Websites</b>  (d)BMP: <b>Public Notice for Meeting</b>  (e)BMP: <b>Post Draft SWMP on Website</b>  (f)BMP: <b>Public Notice in Newspaper</b>	<ul style="list-style-type: none"> <li>• Distribute storm water related materials. At least 500 copies will be distributed annually throughout the life of the new permit.</li> <li>• Document participation with other organizations. Participation will continue throughout the permit term.</li> <li>• The El Paso County Public Works website is active and contains storm water information. The sites will be reviewed annually to determine if content revisions are needed.</li> <li>• Staff will verify that Commissioner’s Court meetings comply with public notice requirements and include that information in the annual reports to TCEQ. Public notice for meetings is already in effect and will continue throughout the life of the new permit.</li> <li>• Staff will post the Draft SWMP on the County Website as submitted to TCEQ for review and approval.</li> <li>• Publish TCEQ Executive Director’s Preliminary Determination in the El Paso Times within 30 days after being notified by the TCEQ Office of Chief Clerk.</li> </ul>

<p><b>MCM #2, Section III.2:          Illicit Discharge Detection and          Elimination MCM</b></p>	<p>(a)BMP: <b>Detection: Monitoring Drainage System</b></p> <p>(b)BMP: <b>Detection &amp; Correction: Citizen Reports and County Staff Surveillance.</b></p> <p>(c)BMP: <b>Correction: On-Site Sewage Facilities.</b></p> <p>(d)BMP: <b>Detection: Storm Drainage Map</b></p> <p>(e)BMP: <b>Detection &amp; Correction: Illegal Dumping Team.</b></p> <p>(f)BMP: <b>Detection &amp; Correction: Inspections and Response to Complaints</b></p> <p>(g)BMP: <b>Employee Training</b></p>	<ul style="list-style-type: none"> <li>• Visually monitor outfalls or location discharge within drainage ditch systems for indicators of illicit discharges or water pollution. This activity will continue throughout the life of the new permit.</li> <li>• Illicit discharge, complaints from citizens will be investigated by staff. This activity will continue throughout the life of the new permit.</li> <li>• Software has been obtained and used to track corrective actions taken regarding on-site sewage facilities and will continue throughout the life of the new permit.</li> <li>• Resources have been identified and implemented and will continue to be utilized throughout the life of the new permit.</li> <li>• Document activities and include findings in the annual report and will continue throughout the life of the new permit.</li> <li>• Continue to document yearly activities throughout the life of the new permit.</li> <li>• County field staff will continue to receive illicit discharge detection and elimination training during the life of the new permit.</li> </ul>
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<p><b>MCM #3, Section III.3:          Construction Site Storm Water          Runoff Control MCM</b></p>	<p>(a)BMP: <b>NOI File for Construction</b></p> <p>(b)BMP: <b>Public Submittal of Information</b></p> <p>(c)BMP: <b>Site Plan Review</b></p> <p>(d)BMP: <b>Site Inspection and Enforcement</b></p> <p>(e)BMP: <b>Employee Training</b></p>	<ul style="list-style-type: none"> <li>• Continue to maintain/update the existing file system throughout the life of the new permit.</li> <li>• The County of El Paso will address public requests of storm water quality issues associated with construction sites prior to implementing a voluntary construction inspection and enforcement referral program. The County will collect, review and maintain the information. This activity will continue throughout the life of the new permit.</li> <li>• Language of storm water information will continue to be incorporated into concurrence letters to developers for County’s preliminary and final approvals. The County Subdivision Regulations document will be revised (pending Commissioner Court approval) to address current storm water quality information within the life of the new permit.</li> <li>• Voluntary construction site inspections will be conducted throughout the life of the new permit. The number of inspections will be determined based on construction activity in the County of El Paso.</li> <li>• County employees involved with construction inspection and management will continue to receive training for construction site stormwater runoff control during the life of the new permit.</li> </ul>
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<p><b>MCM #4, Section III.4:          Post Construction Storm Water          Management in New Development          And Redevelopment MCM</b></p>	<p>(a)BMP: <b>Runoff Control Program</b></p> <p>(b)BMP: <b>Pervious Drainage Systems</b></p> <p>(c)BMP: <b>Site Inspection and Enforcement</b></p> <p>(d)BMP: <b>AgriLIFE EXTENSION Program</b></p>	<ul style="list-style-type: none"> <li>• The County of El Paso will conduct semi-annual inspections to ensure that there is no water quality impact after construction. This is currently in effect and will remain in effect throughout the life of the new permit.</li> <li>• Provide an annual list of the maintained drainage ditches in the annual report throughout the life of the new permit.</li> <li>• Voluntary construction site inspections will be conducted throughout the life of the new permit. The number of inspections will be determined based on construction activity in the County of El Paso</li> <li>• Provide support and education on AgriLIFE EXTENSION Program, beginning in Permit Year 1 and continuing through Permit Year 5.</li> </ul>
<p><b>MCM #5, Section III.5:          Pollution Prevention/Good          Housekeeping for Municipal          Operations          MCM</b></p>	<p>(a)BMP: <b>County Operations Survey</b></p> <p>(b)BMP: <b>Detection and correction: County Staff Surveillance</b></p>	<ul style="list-style-type: none"> <li>• At least 6 County facility locations will be visually monitored annually to identify operation activities that may potentially impact storm water quality or generate illicit discharges beginning Permit Year 1.</li> <li>• Staff discovery of activities that may potentially impact water quality will be investigated with 2 weeks. Corrective actions will be addressed immediately. This activity will be performed throughout the life of the new permit.</li> </ul>

	<p>(c)BMP: <b>Proper Waste Disposal</b></p> <p>(d)BMP: <b>Employee Training</b></p> <p>(f)BMP: <b>SPCC Plans for County Facilities</b></p>	<ul style="list-style-type: none"> <li>• The report will be maintained and updated throughout the life of the new permit.</li> <li>• County employees with the potential to impact storm water will receive pollution prevention training during the life of the new permit.</li> <li>• Verify that an SPCC plan exists per facility and that it is currently appropriate for the facility. If an SPCC plan does not exist or is no longer appropriate for the facility, a new SPCC plan will be developed and implemented. By Year 5, SPCC plans for all county facilities will be current, functional and implemented.</li> </ul>
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