



**3//23/2021**

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

Re: Phase II MS4 Annual Report Transmittal for the City of Universal City  
TPDES Authorization: TXR040034

Dear Team Leader:

This letter serves to transmit the required annual report for the Texas Pollutant Discharge Elimination System Small Municipal Separate Storm Sewer System General Permit, Authorization Number TXR040034 for the City of Universal City.

The annual report is for Year 2. The reporting period beginning 1/1/2020 and ending 12/31/2020.

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

As required by the general permit, a copy of the report has been mailed to the TCEQ's regional office 13 in San Antonio, Texas.

Sincerely,

Wesley T. Keller  
Stormwater Inspector



**3/23/2021**

Texas Commission on Environmental Quality  
Stormwater & Team Leader (MC-148)  
14250 Judson Rd  
San Antonio, Texas 78233-4480

Re: Phase II MS4 Annual Report Transmittal for City of Universal City  
TPDES Authorization: TXR040034

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Sincerely,

Wesley T. Keller  
Stormwater Inspector

# Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number **TXR040000**

## A. General Information

Authorization Number: **TXR040034**

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

Annual Reporting Year Option Selected by MS4:

Calendar Year: **X**

Permit Year: **N/A**

Fiscal Year: **N/A** Last day of fiscal year: (**N/A**)

Reporting period beginning date: (month/date/year) **1/1/2020**

Reporting period end date: (month/date/year) **12/31/2020**

MS4 Operator Level: **2** Name of MS4: **City of Universal City**

Contact Name: **Wesley Keller** Telephone Number: **210-659-0333 x722**

Mailing Address: **2150 Universal City Blvd, Universal City, TX 78148**

E-mail Address: **stormwater@uctx.gov**

A copy of the annual report was submitted to the TCEQ Region: YES **X** NO \_\_\_\_\_  
the annual report was submitted to: TCEQ Region **13**

## B. Status of Compliance with the MS4 GP and SWMP

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

	Yes	No	Explain
Permittee is currently in compliance with the SWMP as submitted to and approved by the TCEQ.	X		We are currently in compliance
Permittee is currently in compliance with recordkeeping and reporting requirements.	X		We are currently in compliance
Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.).	X		We are currently in compliance
Permittee conducted an annual review of its SWMP in conjunction with preparation of the annual report	X		We are currently in compliance

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

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
1,2	Household Hazardous Waste Collection	Yes, the activity discourages illicit discharges of hazardous chemical waste to the MS4 and encourages proper disposal
1,2	Fall & Spring Cleanup	Yes, the activity discourages illegal dumping of bulk solid waste to the MS4 and encourages proper disposal
1	Newsletter Articles	Yes, the newsletter provides vital information to our citizens which they use to reduce pollutants in runoff

1,2,3,4	Complaint Hotline	Yes, gives citizens of Universal City an avenue to pursue complaints about illicit discharges into the MS4. Allows us to pinpoint problems and eliminate specific sources of pollutants
1,2	Storm Drain Placarding	Yes, informs citizens that the storm sewer system drains into natural waterways
3	Sanitary Sewer Evaluation Survey	Yes, monitoring, and periodic inspection of the sewer systems within our city is a vital action to prevent/reduce/eliminate inadvertent sewer discharges into creeks and streams
3	Nuisance Abatement, Anti-Littering, & Illicit Discharge Ordinances	Yes, strongly worded ordinances give the city enforcement capabilities to deal with illegal dumping, illicit discharges, and improper disposal of solid wastes
4	Construction and Demolition Site Ordinances	Yes, ordinances which the city has in place create clear rules and protocols for construction projects to greatly discourage discharges from construction sites that might impact water quality
4	Construction Site Inspections	Yes, periodic inspections of construction sites provide enforcement of rules which limit or eliminate sources of pollution from construction sites
5	Post Construction Ordinance	Yes, policies and procedures requiring the implementation of post-construction runoff controls to the extent allowable under state or local law compels implementation of controls that reduce pollutant discharges
5	Design Criteria Manuals	Yes, a combination of structural and/or non-structural BMPs will reduce pollutant discharges. Policies and procedures requiring the implementation of post-construction runoff controls to the extent allowable under state or local law compels implementation of controls that reduce pollutant discharges
5	Plan Review and Approval Procedures for Post-Construction BMPs	Yes, policies and procedures requiring the implementation of post-construction runoff controls to the extent allowable under state or local law compels implementation of controls that reduce pollutant discharges
5	Inspections of Post Construction BMPs	Yes, the long-term operation and maintenance of controls preserve pollutant removal functions which ultimately reduce pollutant discharges

6	Spill Response Kits	Yes, spill response kits installed at city facilities will be used to capture pollutants from spills before the pollutants can enter into the MS4
6	Pesticide/Herbicide Management	Yes, Pesticide and herbicide management reduces pollutant discharges associated with mowing activities.
6	Street Sweeping	Yes, Street Sweeping removes pollutants from roads and streets, an important component of the MS4
6	O & M Employee Training	Yes, training employees to find storm water friendly methods to do their jobs is an integral part of our program
6	Good Housekeeping Rules Manual	Yes, gives city employees a resource to fall back on if they need a reference

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

<b>MCM</b>	<b>BMP</b>	<b>Information Used</b>	<b>Quantity</b>	<b>Units</b>	<b>Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)</b>
1,2	Household Hazardous Waste Collection	Amounts from Manifest	498	Tires	Yes, reduces illegal dumping
1,2	Household Hazardous Waste Collection	Amounts from manifest	1,100	(gal.) latex paint	Yes, reduces illegal dumping
1,2	Household Hazardous Waste Collection	Amounts from manifest	220	(gal.) oil paint	Yes, reduces illegal dumping
1,2	Household Hazardous Waste Collection	Amounts from manifest	129	Car batteries	Yes, reduces illegal dumping

1,2	Household Hazardous Waste Collection	Amounts from manifest	187	(gal.) motor oil	Yes, reduces illegal dumping
1,2	Household Hazardous Waste Collection	Amounts from manifest	44	(gal.) antifreeze	Yes, reduces illegal dumping
1,2	Household Hazardous Waste Collection	Amounts from manifest	29	Oil filters	Yes, reduces illegal dumping
1,2	Household Hazardous Waste Collection	Amounts from manifest	504	Fluorescent lights	Yes, reduces illegal dumping
1,2	Fall and Spring Cleanup	Unknown	Curbside Pickup – Waste Management	Televisions and Monitors	Yes, reduces illegal dumping
1,2	Fall and Spring Cleanup	Unknown	Curbside Pickup – Waste Management	Computers	Yes, reduces illegal dumping
1,2,3,4,5	Complaint Hotline	Complaint Log	0	calls	No, but it helps with enforcement against willful polluters
1, 3	Storm Drain Placarding	Records on file	~330	placards	No, but the placards remind people not to dump in storm drains
3	Sanitary Sewer Evaluation Survey	Inspection planning documents  Sanitary Sewer Closed Circuit Television	59,520	Linear Feet Televised	Yes, the inspections and associated repairs to the sanitary sewer system prevent an unknown volume of sewage from discharging into the MS4.
3	Nuisance Abatement, Anti-Littering, & Illicit Discharge Ordinances	Municode			Yes, the laws in effect prevent at least some people from discharging an unknown quantity of pollutants into the MS4.

3	Storm Sewer Map	Digital mapping	~163	Outfalls	No, but it does allow us to understand where everything in our MS4 is located which helps.
4	Construction and Demolition Site Ordinances	Municode			Yes, City ordinances prevent at least some contractors from intentionally discharging an unknown volume of silt and other pollutants into our MS4
4	Construction Site Inspection Protocols	SWMP			Yes, ensuring that protocols are in place and inspectors are trained prevent at least some contractors from intentionally discharging an unknown volume of pollutants into our MS4.
4	Construction Runoff Control Criteria Manuals	SWMP			No, but the documents provide guidance to contractors and engineering consultants to help prevent pollution.
4	Erosion, Sediment and On-site Waste Control Plan Submittal Sheet	SWMP			No, but the document provides guidance to contractors and engineering consultants to help prevent pollution.
4	Construction Site Plan Review and Approval Procedures	SWMP			No, but the plan review procedures ensure that sensible BMPs are utilized to minimize the impact of construction sites.
4	Construction Site Inspections	Permitting Database	51	Construction sites inspected	Yes, inspections help keep honest contractors honest, and ensure that incidental discharges are dealt with promptly.

5	Post Construction Ordinance	Municode			No, but the ordinance provides regulatory guidance about the City's expectations for post-construction stormwater pollution prevention.
5	Design Criteria Manual	SWMP			No, but the document provides guidance for the design and implementation of post-construction BMPs which prevent pollution.
5	Plan Review and Approval Procedures for Post-Construction BMPs	SWMP			No, but it ensures that drawings for post-construction BMPs are reviewed for propriety. The BMPs reduce the impact of stormwater pollution.
5	Inspections of Post Construction BMPs	Inspection Records	16 inspections of 4 structural BMPs	Inspections	No, but it ensures that post-construction BMPs are functioning properly which helps reduce the impact of stormwater pollution.
6	Spill Response Kits	SWMP	2	Kits	No, but having the kits give City staff the ability to clean up incidental spills which could potentially lead to a discharge to the MS4.
6	Pesticide/Herbicide Management	Head count	2	certifications	No, but proper use of these chemicals helps to reduce their impact on stormwater.
6	Street Sweeping	Street Sweeping logs	317 streets swept at least 3 times each	streets	Yes, street sweeping physically removes an unknown amount of debris and pollutants from the City's streets.
6	Good Housekeeping Rules Manual	SWMP			No, but it gives City Staff the information they need to minimize stormwater impacts in their daily labors.

6	O&M at City Facilities	Inspection records	4	Inspections	Yes, keeping things neat and clean prevents an unknown volume of pollutants from discharging to the City's MS4
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4. Provide the measurable goals for each of the MCMs, and an evaluation of the success of the implementation of the measurable goals (**see Example 3 in instructions**):

<b>MCM(s)</b>	<b>Measurable Goal(s)</b>	<b>Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.</b>
1,2	Record the date of advertisement. Maintain Copy of the advertising announcement. (Household Hazardous Waste Collection Event)	Met Goal
1,2	Conduct two events each year and prepare a summary of the events. Estimate the number of households participating. Assess whether appropriate staff time was devoted to the preparation and execution of the event. Record recommendations to improve future events. (Household Hazardous Waste Collection Event)	Met Goal
1,2	Record the type, volume, and method of disposal for waste received. (Household Hazardous Waste Collection Event)	Met Goal
1,2	Record the date of advertisement. Maintain Copy of the advertising announcement. (Fall and Spring Cleanup)	Met Goal
1,2	Conduct two events each year and prepare a summary of the events. Estimate the number of households participating. Assess whether appropriate staff time was devoted to the preparation and execution of the event. Record recommendations to improve future events. (Fall and Spring Cleanup)	Met Goal
1,2	Record the type, volume, and method of disposal for waste received. (Fall and Spring Cleanup)	Met Goal

1,2,3,4,5	Operate existing complaint hotline. (Complaint Hotline)	Met Goal
1,2,3,4,5	Maintain log of advertising methods used to publicize hotline. (Complaint Hotline)	Met Goal
1,3	Purchase placards. (Storm Drain Placarding)	Met Goal
1,3	Install placards. (Storm Drain Placarding)	Met Goal
1,3	Develop format for storm water-related articles to appear in the city's newsletter. ("The Gateway: Universal City Community Magazine" newsletter articles)	Met Goal
1,3	Write and publish storm water articles, complete activity twice per year. Maintain a copy of each stormwater article and record the number of newsletters distributed. ("The Gateway: Universal City Community Magazine" newsletter articles)	Made progress toward goal, but only published one stormwater article this year due to time constraint
3	Complete organization of program. Complete creation of inspection support documents and findings tracking system. (Illicit Discharge Detection and Elimination Program)	Met Goal
3	Update storm sewer system map once per permit term. (Storm Sewer Map)	Met Goal
4	Review and revise, if necessary, existing ordinances dealing with erosion, sediment control, and on-site waste controls. (Revise Existing Nuisance, Antilittering, and Illicit Discharge Ordinances)	Met Goal
4	Develop construction site inspection protocols. (Construction Site Inspection Protocols)	Met Goal
4	Prepare brief memorandum documenting necessary criteria, document additions or changes. (Construction Runoff Control Criteria Manuals)	Met Goal

4	Revise and/or adopt criteria manuals for use by the City. (Construction Runoff Control Criteria Manuals)	Met Goal
4	Develop a standardized erosion and sediment control and on-site waste control plan sheet for developers to submit with plans for review (Standard SWPPP sheet). (Erosion, Sediment and On-site Waste Control Plan Submittal Sheet)	Met Goal
4	Review construction plans for sites disturbing more than one acre. (Construction Site Plan Review and Approval Procedures)	Met Goal
4	Ensure inspectors are trained. (Construction Site Inspections)	Met Goal
4	Conduct site inspections and enforcement. Inspect 100% of site with disturbed areas larger than one acre. Maintain log. (Construction Site Inspections)	Met Goal
5	Adopt revised ordinances. (Post-Construction Ordinance)	Met Goal
5	Provide public notice for adopted ordinances. (Post-Construction Ordinance)	Met Goal
5	Revise and/or adopt existing criteria manuals relating to new development. (Design Criteria Manuals)	Met Goal
5	Develop post-construction BMP plan review procedures. (Plan Review & Approval Procedures for Post-Construction BMPs)	Met Goal
5	Inventory and inspect city-owned and private permanent post-construction BMPs. (Inspections and Long-Term O&M Provisions)	Met Goal
6	Document deployment of kits at all inventoried facilities each year. (Spill Response Kits)	Met Goal
6	Track employee certifications of all pesticide/herbicide staff. (Pesticide/Herbicide Management)	Met Goal

6	Complete street sweeping at least twice annually. Maintain log indicating date and location of areas swept. (Street Sweeping)	Met Goal
6	Sweep major roads at least six times and all other roads at least four times annually. Maintain log indicating date and location of areas swept. (Street Sweeping)	Made progress toward goal but swept streets fewer times due to time constraints
6	Record dates of inspection and identify maintenance activities performed. (O&M at City Facilities)	Met Goal

### C. Stormwater Data Summary

Provide a summary of all information used, including any lab results (if sampling was conducted) to assess the success of the SWMP at reducing the discharge of pollutants to the MEP. For example, did the MS4 conduct visual inspections, clean the inlets, look for illicit discharge, clean streets, look for flow during dry weather, etc.?

We are making progress toward reducing the discharge of pollutants to the maximum extent practicable. Our Household Hazardous Waste Collection Events (MCM 1 and 2) discourage illicit discharges of hazardous chemical wastes to the MS4 and encourages proper disposal. Our Fall and Spring Cleanup events (MCM 1 and 2) discourages illegal dumping of bulk solid wastes to the MS4 and encourages proper disposal. Our twice annual Newsletter articles in "The Gateway" (MCM 1) provide vital information to our citizens which they can use to reduce pollutants in runoff. We have a complaint hotline (MCM 1, 2, 3, and 4) which gives citizens of Universal City an avenue to report illicit discharges into the MS4. This allows us to pinpoint problems and eliminate specific sources of pollutants. Our storm drain placarding program ((MCM 1 and 2) informs citizens that the storm sewer system drains into natural waterways. Our Nuisance Abatement, Anti-Littering, and Illicit Discharge Ordinances (MCM 3) are strongly worded regulations which give the City enforcement powers to fight illegal dumping, illicit discharges, and improper disposal of solid wastes. The periodic sanitary sewer evaluation survey allows the City to pinpoint sources of pollution and eliminate them. Construction and Demolition Site Ordinances (MCM 4) allow the City to create clear rules and protocols for construction projects to greatly discourage discharges from construction sites that might impact surface water quality. Construction Site Inspections (MCM 4) provide a means of enforcement of rules which limit or eliminate sources of pollution from construction sites. Our Post-Construction Ordinance (MCM 5) sets in place policies and procedures requiring the implementation of post-construction runoff controls to the extent allowable under State or local laws. The Ordinance compels

implementation of controls that reduce pollutant discharges. Our Design Criteria Manuals (MCM 5) provide for a mix of structural and non-structural BMPs which reduce pollutant discharges. Policies and procedures requiring the implementation of post-construction runoff controls compel the implementation of controls that limit pollutant discharges. Plan Review and Approval Procedures For Post-Construction BMPs (MCM 5) allow the City to compel the creation of post-construction runoff controls that reduce pollutant discharges. Inspections of Post-Construction BMPs (MCM 5) confirm the long-term operation and maintenance of post-construction controls, ultimately reducing pollutant discharges. The City has several BMPs which improve our own housekeeping. We implemented Spill Response Kits (MCM 6) at City facilities likely to contribute to storm water pollution. The kits are used to capture a pollutant from a spill before the pollutant can enter the City's MS4. Pesticide/Herbicide Management (MCM 6) reduces pollutants associated with mowing and pest control activities. We have two licensed applicators. Universal City implements Street Sweeping (MCM 6) to remove pollutants from streets and roadways which are an important component of our MS4. Operations and Maintenance Employee Training (MCM6) trains employees to use stormwater-friendly methods to do their jobs. It is an integral part of our program. Our Good Housekeeping Rules Manual (MCM 6) provides employees a resource to fall back on if they need a reference. All of these BMPs combine to help the City of Universal City to reduce pollutants to the maximum extent practicable.

## **D. Impaired Waterbodies**

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

**N/A (No impaired water bodies)**

2. If applicable, explain below any activities taken to address the discharge to impaired waterbodies, including any sampling results and a summary of the small MS4's BMPs used to address the pollutant of concern.

**N/A (No impaired water bodies)**

3. Describe the implementation of targeted controls if the small MS4 discharges to an impaired water body with an approved TMDL.

**N/A (No impaired water bodies)**

4. Report the benchmark identified by the MS4 and assessment activities:

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

5. Provide an analysis of how the selected BMPs will be effective in contributing to achieving the benchmark:

<b>Benchmark Parameter</b>	<b>Selected BMP</b>	<b>Contribution to achieving Benchmark</b>
N/A	N/A	N/A
N/A	N/A	N/A

N/A	N/A	N/A
N/A	N/A	N/A

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

<b>Description of bacteria-focused BMP</b>	<b>Comments/Discussion</b>
N/A	N/A

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

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

- number of sources identified or eliminated;
- number of illegal dumpings;
- increase in illegal dumping reported;
- number of educational opportunities conducted;

- reductions in sanitary sewer flows (SSOs); /or
- increase in illegal discharge detection through dry screening.

<b>Benchmark Indicator</b>	<b>Description/Comments</b>
N/A	N/A

## **E. Stormwater Activities**

Describe activities planned for the next reporting year:

<b>MCM(s)</b>	<b>BMP</b>	<b>Stormwater Activity</b>	<b>Description/Comments</b>
1,2	Household Hazardous Waste Collection	Household Hazardous Waste Collection	Collect house-hold hazardous waste. Document Collection (twice annually)
1,2	Fall and Spring Collection	Household Hazardous Waste Collection	Collect house-hold hazardous waste. Document Collection (twice annually)


**F. SWMP Modifications**

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

Yes  No

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

Yes  No

If “Yes,” report on changes made to measurable goals and BMPs:

<b>MCM(s)</b>	<b>Measurable Goal(s) or BMP(s)</b>	<b>Implemented or Proposed Changes (Submit NOC as needed)</b>
N/A	N/A	N/A


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

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

### G. Additional BMPs for TMDLs and I-Plans

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

<b>BMP</b>	<b>Description</b>	<b>Implementation Schedule (start date, etc.)</b>	<b>Status/Completion Date (completed, in progress, not started)</b>
N/A	N/A	N/A	N/A



2a. Does the permittee utilize the optional seventh MCM related to construction?

Yes  No

2b. If "yes," then provide the following information for this permit year:

<b>The number of municipal construction activities authorized under this general permit</b>	
The total number of acres disturbed for municipal construction projects	

**Note:** *Though the seventh MCM is optional, implementation must be requested on the NOI or on a NOC and approved by the TCEQ.*

## J. Certification

If this is this a system-wide annual report including information for all permittees, each permittee shall sign and certify the annual report in accordance with 30 TAC §305.128 (relating to Signatories to Reports).

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

Name (printed): \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name of MS4 \_\_\_\_\_

Name (printed): \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name of MS4 \_\_\_\_\_

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

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