



MONTGOMERY COUNTY

STORMWATER QUALITY COALITION

STORMWATER MANAGEMENT PROGRAM

AS REQUIRED BY:

TPDES GENERAL PERMIT NO. TXR040000

PREPARED BY:



LJA ENGINEERING

2615 CALDER AVE, STE 500
BEAUMONT, TEXAS 77702
PHONE: (409) 833-3363
FAX: (409) 833-0317

Table of Contents

INTRODUCTION		1 - 4
SECTION 1	PUBLIC EDUCATION, OUTREACH, AND INVOLVEMENT	5 – 9
	1.A. Permit Requirements	
	1.B. Program Overview	
	1.C. Best Management Practices and Measurable Goals	
	1.D. BMP Implementation Schedule and MS4 Responsibilities	
SECTION 2	ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE)	10 – 12
	2.A. Permit Requirements	
	2.B. Program Overview	
	2.C. Best Management Practices and Measurable Goals	
	2.D. BMP Implementation Schedule and MS4 Responsibilities	
SECTION 3	CONSTRUCTION SITE STORMWATER RUNOFF CONTROL	13 – 16
	3.A. Permit Requirements	
	3.B. Program Overview	
	3.C. Best Management Practices and Measurable Goals	
	3.D. BMP Implementation Schedule and MS4 Responsibilities	
SECTION 4	POST CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT	17 - 19
	4.A. Permit Requirements	
	4.B. Program Overview	
	4.C. Best Management Practices and Measurable Goals	
	4.D. BMP Implementation Schedule and MS4 Responsibilities	
SECTION 5	POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS	20 – 23
	5.A. Permit Requirements	
	5.B. Program Overview	
	5.C. Best Management Practices and Measurable Goals	
	5.D. BMP Implementation Schedule and MS4 Responsibilities	
SECTION 6	INDUSTRIAL STORMWATER SOURCES	24
	6.A. Permit Requirements	
	6.B. Program Overview	
SECTION 7	MUNICIPAL CONSTRUCTION ACTIVITIES	25
	7.A. Permit Requirements	
	7.B. Program Overview	
SECTION 8	IMPAIRED WATER BODIES AND TOTAL MAXIMUM DAILY LOAD (TMDL) REQUIREMENTS	26 – 29
	8.A. Permit Requirements	
	8.B. Impaired Water Bodies	
	8.C. Best Management Practices and Measurable Goals	
	8.D. BMP Implementation Schedule and MS4 Responsibilities	

Introduction

This stormwater management program for the Montgomery County Stormwater Quality Coalition has been prepared in compliance with the TPDES General Permit No. TXR040000 with the effective date of January 24, 2019. The Coalition developed and implemented their original SWMP during the first TPDES TXR040000 permit term and is continuing their program at full implementation. All previously established interim milestones have been achieved, however the Coalition has included implementation dates for each BMP included in the SWMP based on the frequency of the action as required by Part III Section A.2(a) of TXR040000. The SWMP is designed to cover the duration of the permit term and will be updated as required to ensure compliance with the requirements of TPDES General Permit No. TXR040000 and Section 402(p)(3)(B) of the Clean Water Act. The Coalition has reviewed the permit requirements established for each minimum control measure and developed clear, specific, and measurable BMPs and corresponding goals.

All permittees listed below participated in the development and have agreed to contribute in the implementation of this SWMP. Non-traditional MS4s included in the Coalition implement the program to the MEP and rely on adjacent MS4 operators and the TCEQ Region 12 Office for additional enforcement assistance as allowed by Part III, Section A.3(b)(2). This is a shared SWMP for the Montgomery County Stormwater Quality Coalition which consists of the following entities:

Entity	MS4 Level	Permit Number
Montgomery County	Non-Traditional MS4 (Level 2)	TXR040348
The Woodlands Water Agency	Non-Traditional MS4 (Level 2)	TXR040256
City of Conroe	Level 3	TXR040441

Each entity in the Coalition is entirely responsible for meeting the applicable SWMP requirements and has agreed to limit the implementation of their BMPs to the boundaries of their MS4 within the urbanized area. The table below identifies the person for each entity that is responsible for the overall implementation of the SWMP.

Entity	Name	Title
Montgomery County	Michael Lindsey	Director of Consumer Health
The Woodlands Water Agency	Michael Mooney, P.E.	Deputy General Manager
City of Conroe	Tommy Woolley	Director of Capital Projects/Transportation

Montgomery County is located in the Upper Gulf Coast Region of the state and has a total population of approximately 455,746 according to the 2010 census. The classified stream segments that receive discharges from the Coalition's storm sewer system directly and/or indirectly include: Spring Creek, West Fork San Jacinto, Lake Creek, Caney Creek, and Peach Creek. A general location map of Montgomery County is shown below in **Figure 1.1** and maps of the Coalition's urbanized area are included on the following pages as **Figure 1.2, Figure 1.3, and Figure 1.4.**

General Location Map – Montgomery County, Texas

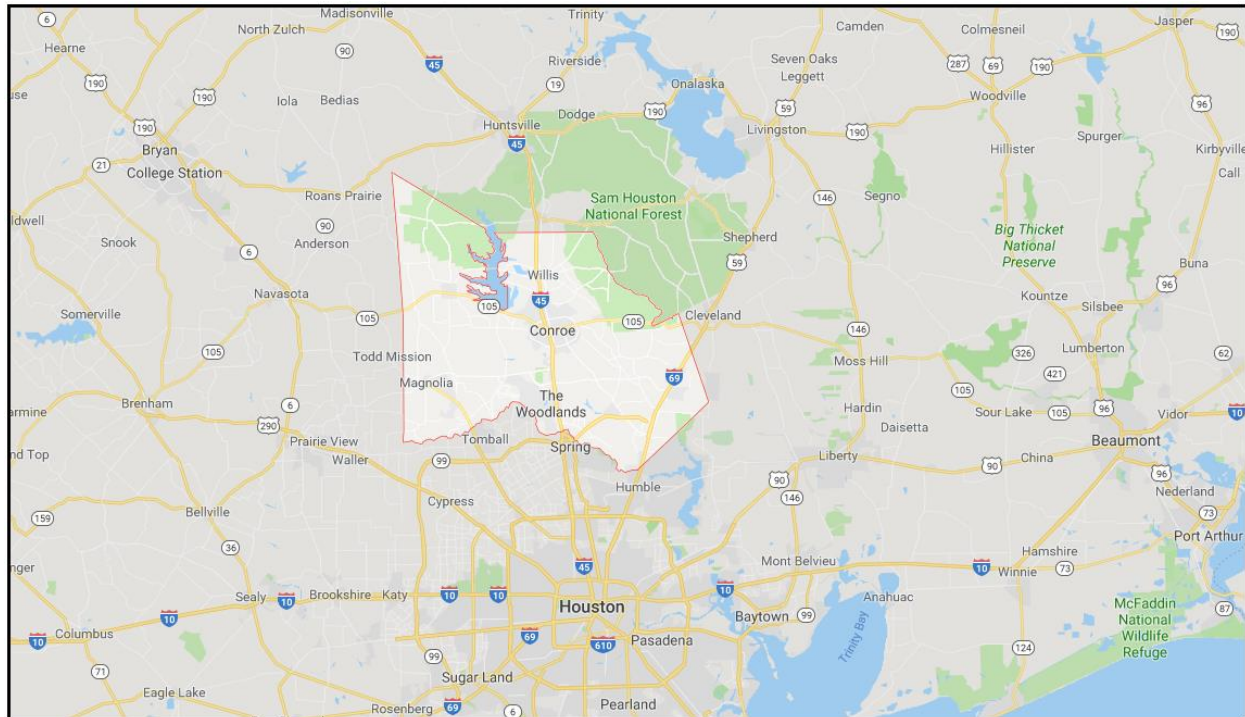


Figure 1.1

2010 Census Urbanized Area Map: Montgomery County, Texas

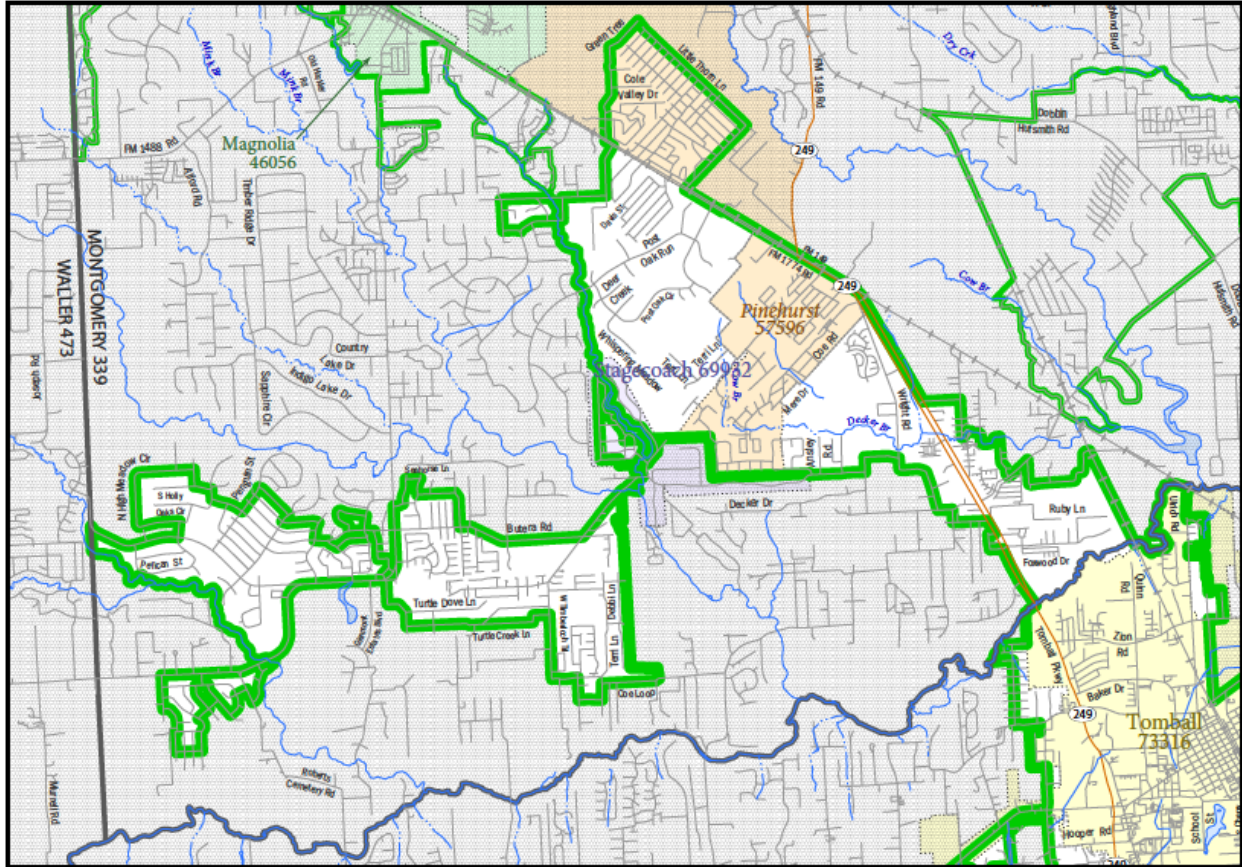


Figure 1.2 (Southwest Region)

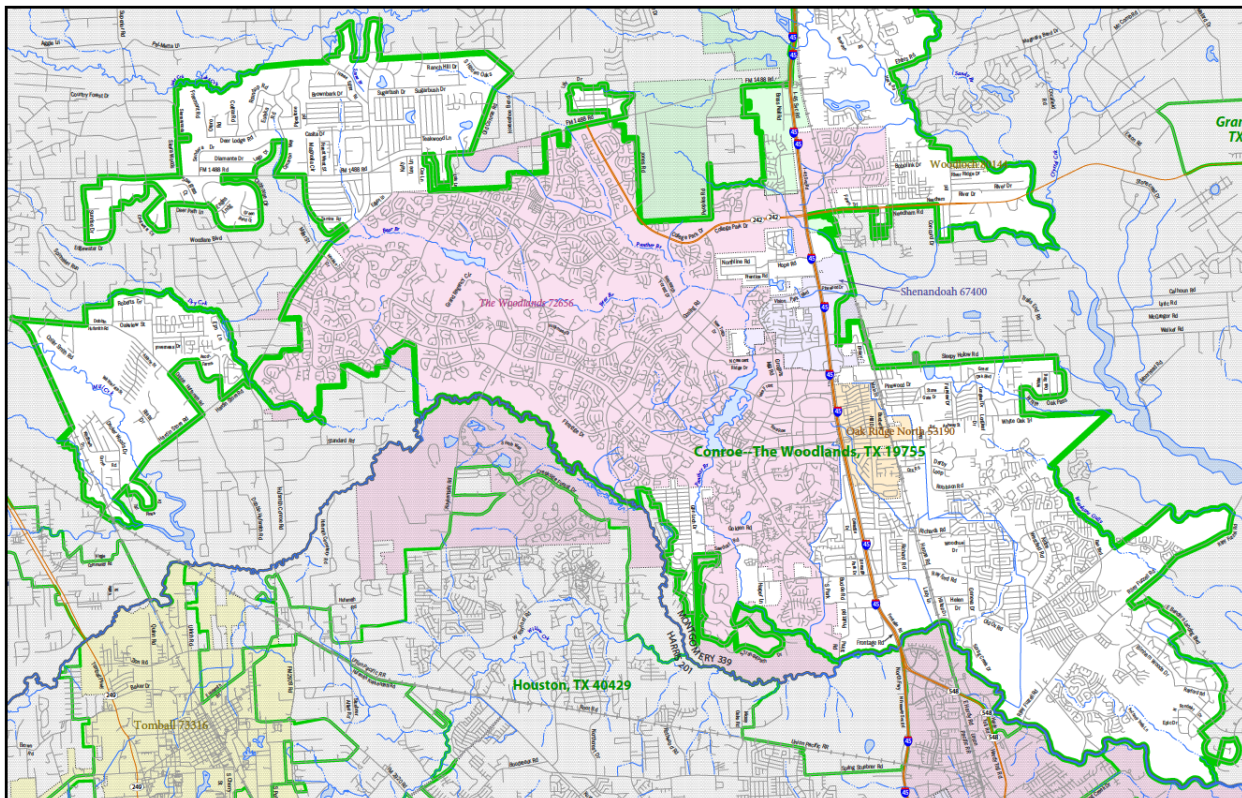


Figure 1.3 (Southeast Region)

2010 Census Urbanized Area Map: Montgomery County, Texas

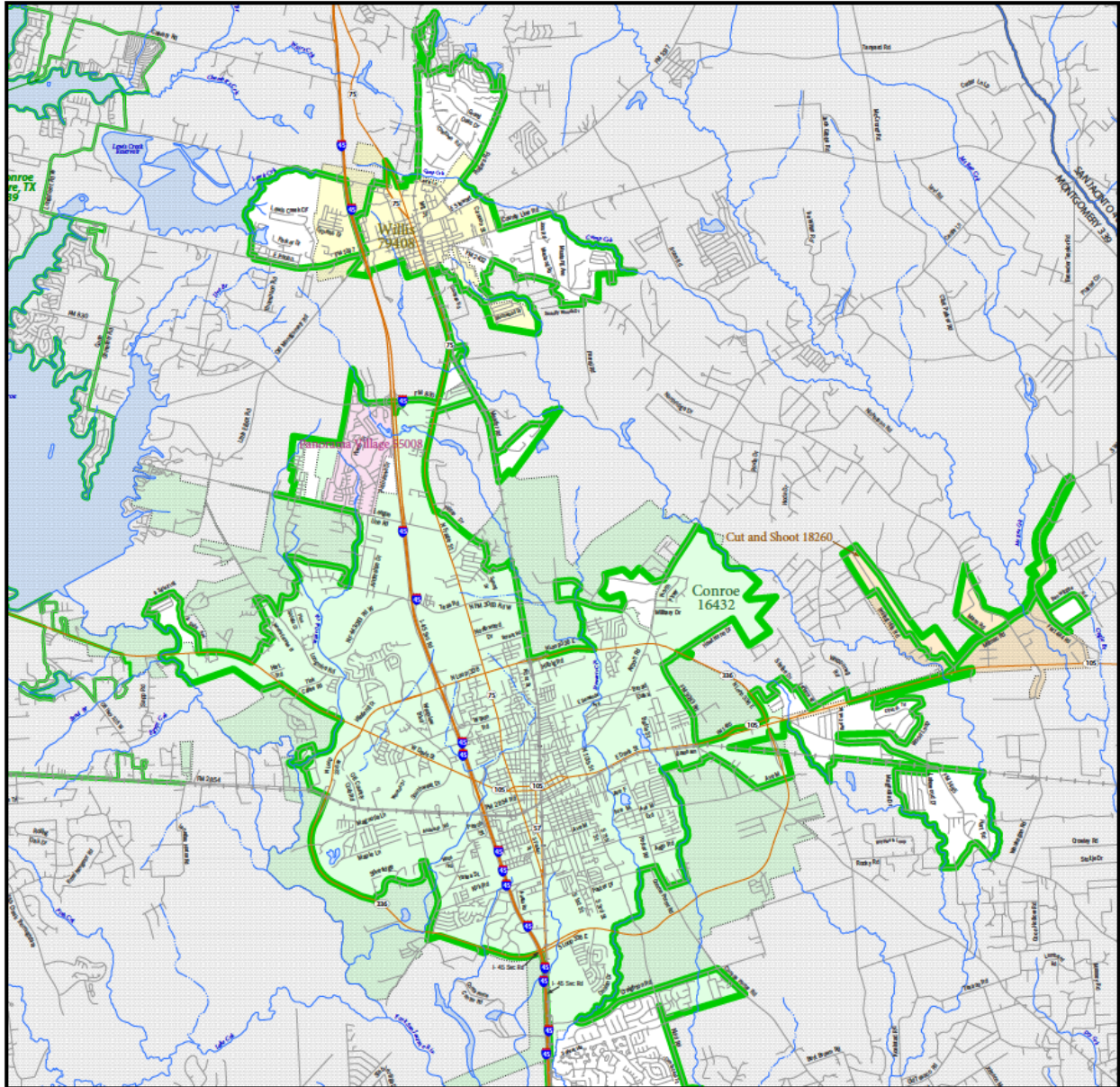


Figure 1.4 (North Region)

Section 1: Public Education, Outreach, and Involvement

1.A. Permit Requirements

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.

All permittees shall involve the public, and, at minimum, comply with any state and local public notice requirements in the planning and implementation activities related to developing and implementing the SWMP, except that correctional facilities are not required to implement this portion of the MCM.

1.B. Program Overview

The permittees have assessed the program elements that were described in the previous permit term, modified them as necessary, and developed new elements to continue reducing the discharge of pollutants from the MS4 to the MEP.

The Coalition has identified high-priority issues that can be addressed using the BMPs developed for Public Education, Outreach, and Involvement and developed the following goals: increase construction site operators' awareness of stormwater pollution; increase local residents' awareness of stormwater pollution; and encourage public involvement in the implementation of the stormwater management program.

The Coalition has reviewed which sources are likely to have significant impacts on stormwater quality and identified the following groups as the target audiences for their public education program:

- residents
- public service employees
- businesses
- commercial and industrial facilities
- construction site personnel

The target audiences were selected based on data collected throughout the implementation of the Coalition's SWMP and by reviewing EPA NPDES guidance documents regarding stormwater pollution sources.

The Coalition will inform the public about the steps they can take to reduce stormwater pollution through the development of flyers and/or brochures, a stormwater quality website containing educational materials (www.TXMS4.com/Montgomery), and guidance documents. Additionally, the Coalition has created opportunities for citizens to participate in the implementation of control measures by: providing citizens with a Stormwater Hotline to report illicit discharges, illegal dumping, spills, and construction site discharge issues; hosting public involvement sessions to allow input from the citizens on the implementation of the program; and by allowing local community organizations to assist in the distribution of public education materials. Through the use of multiple media outlets, the Coalition expects to reach a significant percentage of the local community during the permit term. The activities and materials utilized to fulfill the Public Education, Outreach, and Involvement MCM will be documented. The documentation of these records will be summarized in an annual report and will be specific enough to demonstrate compliance with the existing permit requirements. Included in each BMP is a description of what records will be maintained and reported in the annual reports.

The successfulness of the public education program will be evaluated based on the accomplishment of all associated measurable goals. The measurable goals were selected by analyzing the data collected during the previous permit and establishing program expectations for each associated BMP.

1.C. Best Management Practices and Measurable Goals

Best Management Practices

Public Education and Outreach

- A. Flyers and Brochures:** Development of flyers and brochures for the purpose of educating the public on stormwater impacts and ways they can minimize stormwater pollution.
- B. Education of Children:** Development of educational materials for school age children in order to foster a respect for water quality at an early age.
- C. Education of Construction Site Personnel:** Development of guidance materials for construction site personnel on the proper installation and maintenance of erosion and sediment controls.
- D. Public Service Announcements:** Utilize PSAs on the Coalition's stormwater website to educate the public on the impacts of stormwater pollution and steps they can take to improve water quality.
- E. SWMP Posting:** Post a copy of the SWMP on the Coalition's stormwater quality website for the public to review.
- F. Annual Report Posting:** Post a copy of each year's annual report on the Coalition's stormwater quality website for the public to review.
- G. SWMP Review:** Conduct an annual review of the Coalition's stormwater management program and perform any necessary updates.

Public Involvement

- H. Public Involvement Sessions:** Conduct public involvement sessions to provide access to the stormwater management program and receive comments from citizens to allow public input on the implementation of the program. Public involvement sessions will be conducted through in-person meetings or virtually on the Coalition's stormwater website.
- I. Stormwater Hotline:** Advertise appropriate phone numbers for citizens to participate in the implementation of control measures by reporting illicit discharges, illegal dumping, spills, and construction site discharge issues.
- J. SWMP Public Notice:** The Coalition will adhere to all state and local public notice requirements during the TXR040000 permit renewal process.
- K. Stormwater Quality Website:** Develop and maintain a stormwater quality website to ensure that the public can easily find information about the SWMP and inform citizens about steps they can take to improve water quality.
- L. Educational Material Distribution:** Provide local community organizations with the opportunity to assist in the distribution of stormwater quality educational materials by providing them with materials for distribution at their meetings, when requested. All educational materials will be included on the stormwater quality website for viewing by the public.

Measurable Goals & Record Keeping

BMP	Records to be Maintained	Measurable Goals
Flyers and Brochures	Number of materials developed and/or maintained on the stormwater website	Develop or maintain on the stormwater website at least 2 types of flyers/brochures per year
Education of Children	Number of materials developed	Develop at least 1 type of educational material annually for children
Education of Construction Site Personnel	Number of educational materials or guidance documents posted on the stormwater website	Make available annually on stormwater website at least 1 guidance document or brochure on construction site runoff issues
Public Service Announcements	Number of different PSAs being posted on the Coalition's stormwater website	Maintain at least 1 PSA on the Coalition's stormwater website annually to educate the public about water quality
SWMP Posting	Stormwater quality website with SWMP posted	Post a copy of the SWMP on the Coalition's stormwater website no later than 30 days after the TCEQ approval date
Annual Report Posting	Stormwater quality website with annual reports posted	Annually post a copy of the most recent annual report on the stormwater website no later than 30 days after the due date
SWMP Review	SWMP review forms including a description of any necessary updates	Conduct annual review of SWMP and perform any necessary updates
Public Involvement Sessions	Number of public involvement sessions and associated sign-in sheets (web analytics data will be utilized in lieu of sign-in sheets for virtual sessions)	Conduct at least 1 public involvement session per permit term
Stormwater Hotline	Number of phone calls received regarding stormwater quality issues	Develop or maintain on the stormwater website at least 2 types of materials/media per year that informs the public about reporting stormwater quality concerns
SWMP Public Notice	Affidavits and newspaper tear sheets associated with the public notice process	Comply with TCEQ public notice requirements for the TXR040000 permit renewal process
Stormwater Quality Website	Number of website views	Maintain and make available annually a stormwater quality website
Educational Material Distribution	Number of requests made by local community organizations and amount of materials provided	Maintain collection of education materials on the stormwater quality website annually for local community organizations to view

1.D. BMP Implementation Schedule and MS4 Responsibilities

BMP Implementation Schedule

BMP	Frequency of Action	Implementation Status
Flyers and Brochures	Annually	Full Implementation Continued
Education of Children	Annually	Full Implementation Continued
Education of Construction Site Personnel	Annually	Full Implementation Continued
Public Service Announcements	Annually	Full Implementation Continued
SWMP Posting	Once per permit term	October 2020
Annual Report Posting	Annually	Full Implementation Continued
SWMP Review	Annually	October 2020
Public Involvement Sessions	Once per permit term	October 2022
Stormwater Hotline	Annually	Full Implementation Continued
SWMP Public Notice	Once per permit term	October 2020
Stormwater Quality Website	Annually	Full Implementation Continued
Educational Material Distribution	Annually	October 2020

*BMPs that are implemented on an annual basis will be conducted prior to October 1st of each year.

MS4 Responsibilities

BMP	Montgomery County	WJPA	City of Conroe
Flyers and Brochures			
Education of Children			
Education of Construction Site Personnel			
Public Service Announcements			
SWMP Posting			
Annual Report Posting			
SWMP Review			
Public Meetings			
Stormwater Hotline			
SWMP Public Notice			
Stormwater Quality Website			
Educational Material Distribution			

The Coalition is comprised of both traditional and non-traditional MS4s with different levels of enforcement authority, varying sizes and populations, and unique components/facilities for each entity. Therefore, every BMP included in this SWMP is not applicable for each entity in the Coalition. The raindrop symbol denotes which BMPs each entity will implement. Each participating member in the Coalition has agreed to limit the implementation of their applicable BMPs to the boundaries of their MS4 within the urbanized area.

Section 2: Illicit Discharge Detection and Elimination

2.A. Permit Requirements

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.

2.B. Program Overview

The permittees have assessed the program elements that were described in the previous permit term, modified them as necessary, and developed new elements to continue reducing the discharge of pollutants from the MS4 to the MEP.

The Illicit Discharge Detection and Elimination minimum control measure consists of BMPs that focus on the detection and elimination of illicit discharges into the MS4. The detection of non-stormwater discharges (including leaking on-site sewage disposal systems) and illegal dumping will be accomplished through the inspection of outfalls at a frequency of 20 percent per year such that the Coalition's entire MS4 area will be inspected by the end of the five-year permit term. Any discharges identified during dry weather screening will be analyzed using colorimetric field test kits to determine the nature of the discharge and the flow will be traced upstream to identify the source. Once the source of an illicit discharge has been identified, the Coalition will utilize their regulatory mechanisms/ procedures to ensure that the discharge is eliminated. For non-traditional MS4s included in the Coalition, if illicit connections or illicit discharges are observed related to another operator's MS4, the permittee shall notify the other MS4 operator within 48 hours of discovery. If notification to the other MS4 operator is not practicable, then the permittee shall notify the appropriate TCEQ Regional Office for enforcement assistance. Non-stormwater flows listed in Part II, Section C of TPDES General Permit TXR040000 will not be considered by the permittees as an illicit discharge unless a permittee identifies the flow as a significant source of pollutants to their small MS4.

The non-traditional MS4s included in the Coalition lack the legal authority necessary to develop ordinances to implement enforcement actions against third parties who violate the permit requirements established in TPDES General Permit TXR040000. Therefore, the enforcement authority for each non-traditional MS4 included in the Coalition will be limited to their permittee owned facilities, employees, and contractors within the urbanized area as allowed by Part III, Section A.3(b) of TXR040000.

The successfulness of the illicit discharge detection and elimination program will be evaluated based on the accomplishment of all associated measurable goals. The measurable goals were selected by analyzing the data collected during the previous permit and establishing program expectations for each associated BMP.

2.C. Best Management Practices and Measurable Goals

Best Management Practices

- A. MS4 Outfall Map:** Maintain an updated map of the MS4 indicating the location of stormwater outfalls that discharge into waters of the U.S. and the location and name of all surface waters receiving discharges from the MS4.
- B. MS4 Outfall Inspections:** Conduct inspections of all outfalls in the urbanized area (once per permit term) in order to identify and reduce the presence of illicit discharges to the MS4.

- C. **Regulatory Mechanisms:** Enforce local regulatory mechanisms prohibiting illicit non-stormwater discharges from being discharged into the Coalition's MS4. Within two years from the permit effective date, the coalition will review and revise, if needed, its existing regulatory mechanisms to comply with the current permit requirements. Non-traditional MS4s included in the Coalition have standard operating procedures in place for addressing illicit discharges, in lieu of regulatory mechanisms.
- D. **MS4 Field Staff Training:** Conduct training for MS4 field staff to provide information regarding the identification of illicit discharges and proper reporting procedures.
- E. **IDDE Procedures:** Maintain procedures and all associated records for tracing/removing the source of an illicit discharge, responding to illicit discharges/spills, inspections in response to complaints, and to prevent/correct leaking on-site sewage disposal systems. The Level 3 MS4 included in the Coalition will develop procedures for follow-up investigations to verify that identified illicit discharges have been eliminated.
- F. **Public Reporting:** Develop media to facilitate public reporting of illicit discharges. Options include stormwater hotlines, websites, and flyers/brochures.

Measurable Goals & Record Keeping

BMP	Records to be Maintained	Measurable Goals
MS4 Outfall Map	Updated outfall map showing location of outfalls and surface waters receiving discharges from the MS4	Conduct at least 1 map review per permit term
MS4 Outfall Inspections	Outfall data for each inspection conducted. Data will include at a minimum: date of inspection, location of outfall, and details concerning any identified discharges	Inspect 20% of the outfalls within the urbanized area annually
Regulatory Mechanisms	Number of enforcement actions conducted regarding stormwater quality issues	Maintain ordinances and standard operating procedures in effect annually
MS4 Field Staff Training	Number of training sessions conducted and the associated training materials/attendance lists	Conduct training for at least 80% of the MS4 field staff employees once per permit term
IDDE Procedures	Standard operating procedures for illicit discharge detection/elimination	Annually conduct 1 review of the standard operating procedures and perform any necessary updates
Public Reporting	Number of reports received regarding stormwater quality issues	Develop/maintain on the stormwater website at least 2 types of media and/or materials annually to help facilitate public reporting of stormwater quality issues

2.D. BMP Implementation Schedule and MS4 Responsibilities

BMP Implementation Schedule

BMP	Frequency of Action	Implementation Status
MS4 Outfall Map	Once Per Permit Term	October 2022
MS4 Outfall Inspections	Annually	Full Implementation Continued
Regulatory Mechanisms	Annually	Full Implementation Continued
MS4 Field Staff Training	Once Per Permit Term	October 2022
IDDE Procedures	Annually	Full Implementation Continued
Public Reporting	Annually	Full Implementation Continued

*BMPs that are implemented on an annual basis will be conducted prior to October 1st of each year.

MS4 Responsibilities

BMP	Montgomery County	WJPA	City of Conroe
MS4 Outfall Map			
MS4 Outfall Inspections			
Regulatory Mechanisms			
MS4 Field Staff Training			
IDDE Procedures			
Public Reporting			

The Coalition is comprised of both traditional and non-traditional MS4s with different levels of enforcement authority, varying sizes and populations, and unique components/facilities for each entity. Therefore, every BMP included in this SWMP is not applicable for each entity in the Coalition. The raindrop symbol denotes which BMPs each entity will implement. Each participating member in the Coalition has agreed to limit the implementation of their applicable BMPs to the boundaries of their MS4 within the urbanized area.

Section 3: Construction Site Stormwater Runoff Control

3.A. Permit Requirements

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. The program must include the development and implementation of an ordinance or other regulatory mechanism, as well as sanctions to ensure compliance to the extent allowable under state, federal, and local law, to require erosion and sediment control.

3.B. Program Overview

The permittees have assessed the program elements that were described in the previous permit term, modified them as necessary, and developed new elements to continue reducing the discharge of pollutants from the MS4 to the MEP.

The construction site stormwater runoff minimum control measure consists of BMPs that focus on the reduction of pollutants in stormwater runoff to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre or construction activity that is part of a larger common plan of development or sale that would disturb one acre or more of land. The traditional MS4s included in the Coalition have established ordinances that prohibit illicit discharges such as wastewater, fuels, oils, soaps, solvents, etc. and requires construction site operators to implement appropriate erosion/sediment control BMPs and soil stabilization practices. Additionally, construction site operators are required to implement and maintain BMPs to minimize the discharge of pollutants from: equipment and vehicle washing, wheel wash water, building materials, building products, construction wastes, trash, landscape materials, fertilizers, pesticides, herbicides, detergents, sanitary waste, and any leaks/spills. Details regarding specific prohibited discharges and applicable sanctions are included in each ordinance.

The non-traditional MS4s included in the Coalition lack the legal authority necessary to develop ordinances to implement enforcement actions against third parties who violate the permit requirements established in TPDES General Permit TXR040000. Therefore, the enforcement authority for each non-traditional MS4 included in the Coalition will be limited to their permittee owned facilities, employees, and contractors within the urbanized area as allowed by Part III, Section A.3(b) of TXR040000. For discharges from third party actions, the non-traditional MS4s will conduct inspections to the MEP and utilize enforcement assistance from adjacent MS4 operators and/or the appropriate TCEQ Regional Office.

The successfulness of the construction site stormwater runoff control program will be evaluated based on the accomplishment of all associated measurable goals. The measurable goals were selected by analyzing the data collected during the previous permit and establishing program expectations for each associated BMP.

3.C. Best Management Practices and Measurable Goals

Best Management Practices

- A. Construction Site Plan Review:** Implement a construction site plan review program that focuses on compliance with the local construction regulations and water quality impacts. Plans must meet the requirements established in Part III.B.3(b)(2) subsections a. through c. of TPDES General Permit TXR040000. For non-traditional MS4s, this BMP is limited to the sites operated by the permittee and located within the urbanized area.
- B. Plan Review, Inspection, and Enforcement Procedures:** Maintain and implement site plan review, inspection, and enforcement procedures that describe which plans will be reviewed, when operators may begin construction, soil stabilization requirements, and how inspection/enforcement actions will be conducted.
- C. Construction Site Inspection/Enforcement:** Conduct inspections of construction sites and associated control measures and enforce local regulatory mechanisms to the MEP. For non-traditional MS4s, all enforcement actions are limited to the sites operated by the permittee and located within the urbanized area.
- D. Regulatory Mechanisms:** Enforce local regulations to address stormwater runoff from construction sites which disturb one acre or more or are part of a common plan of development that disturb greater than or equal to one acre. Within two years from the permit effective date, the coalition will review and revise, if needed, its existing regulatory mechanisms to comply with the current permit requirements. Non-traditional MS4s included in the Coalition have standard operating procedures in place for addressing construction site stormwater runoff, in lieu of regulatory mechanisms.
- E. Public Reporting:** Maintain and implement procedures for receipt and consideration of information submitted by the public regarding construction site stormwater runoff.
- F. MS4 Staff Training:** Conduct training for MS4 staff based on the employee training standard operating procedures to provide information regarding the construction site stormwater runoff program.
- G. Construction Site Inventory:** Maintain an inventory of all permitted active public and private construction sites, that disturb one acre or more or are part of a common plan of development that disturb greater than or equal to one acre.

Measurable Goals & Record Keeping

BMP	Records to be Maintained	Measurable Goals
Construction Site Plan Review	Number of plans reviewed and approved for construction	Review 100% of construction plans annually that will result in the disturbances of greater than or equal to one acre, or are part of a common plan of development or sale that will result in the disturbance of one or more acres for compliance with local regulations
Plan Review, Inspection, and Enforcement Procedures	Standard operating procedures that address plan review, inspections, and enforcement actions related to construction site stormwater runoff	Annually conduct 1 review of the standard operating procedures and perform any necessary updates
Construction Site Inspection/Enforcement	Number of construction site inspections conducted	Traditional MS4s: Conduct 2 inspection cycles per month of active construction sites; Non-Traditional MS4s: Conduct 6 construction reconnaissance inspection cycles per year
Regulatory Mechanisms	Number of enforcement actions conducted regarding stormwater quality issues	Maintain ordinances and standard operating procedures in effect annually
Public Reporting	Number of reports received regarding stormwater quality issues	Develop/maintain on the stormwater website at least 2 types of media and/or materials annually to help facilitate public reporting of stormwater quality issues
MS4 Staff Training	Number of training sessions conducted and the associated training materials/attendance lists	Conduct training for at least 80% of the MS4 field staff employees once per permit term
Construction Site Inventory	Number of active construction sites	Maintain an inventory of active construction sites on an annual basis

3.D. BMP Implementation Schedule and MS4 Responsibilities

BMP Implementation Schedule

BMP	Frequency of Action	Implementation Status
Construction Site Plan Review	Annually	Full Implementation Continued
Plan Review, Inspection, and Enforcement Procedures	Annually	Full Implementation Continued
Construction Site Inspection/Enforcement	Annually	Full Implementation Continued
Regulatory Mechanisms	Annually	Full Implementation Continued
Public Reporting	Annually	Full Implementation Continued
MS4 Staff Training	Once Per Permit Term	October 2022
Construction Site inventory	Annually	Full Implementation Continued

*BMPs that are implemented on an annual basis will be conducted prior to October 1st of each year.

MS4 Responsibilities

BMP	Montgomery County	WJPA	City of Conroe
Construction Site Plan Review			
Plan Review, Inspection, and Enforcement Procedures			
Construction Site Inspection/Enforcement			
Regulatory Mechanisms			
Public Reporting			
MS4 Staff Training			
Construction Site inventory			

The Coalition is comprised of both traditional and non-traditional MS4s with different levels of enforcement authority, varying sizes and populations, and unique components/facilities for each entity. Therefore, every BMP included in this SWMP is not applicable for each entity in the Coalition. The raindrop symbol denotes which BMPs each entity will implement. Each participating member in the Coalition has agreed to limit the implementation of their applicable BMPs to the boundaries of their MS4 within the urbanized area.

Section 4: Post Construction Stormwater Management in New Development/Redevelopment

4.A. Permit Requirements

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. The program must be established for private and public development sites. The program may utilize an offsite mitigation and payment in lieu of components to address this requirement.

4.B. Program Overview

The permittees have assessed the program elements that were described in the previous permit term, modified them as necessary, and developed new elements to continue reducing the discharge of pollutants from the MS4 to the MEP.

The Coalition's post construction stormwater management program consists of BMPs to control stormwater discharges from new development and redeveloped sites. The traditional MS4 included in the Coalition has established regulatory mechanisms that require operators of applicable sites to design, install, implement, and maintain a combination of structural and non-structural BMPs appropriate for the community and that protects water quality. In addition, the non-traditional MS4s included in the Coalition review development plans to ensure compliance with local post construction runoff guidelines and inclusion of appropriate permanent stormwater quality controls. Long-term maintenance of the structural controls owned and operated by the Coalition will be conducted by the applicable permittee. Operators of privately-owned structural controls will be required to file a maintenance plan with Montgomery County.

The non-traditional MS4s included in the Coalition lack the legal authority necessary to develop ordinances to implement enforcement actions against third parties who violate the permit requirements established in TPDES General Permit TXR040000. Therefore, the enforcement authority for each non-traditional MS4 included in the Coalition will be limited to their permittee owned facilities, employees, and contractors within the urbanized area as allowed by Part III, Section A.3(b) of TXR040000. For discharges from third party actions, the non-traditional MS4s will conduct inspections to the MEP and utilize enforcement assistance from adjacent MS4 operators and/or the appropriate TCEQ Regional Office.

The successfulness of the post construction stormwater management program will be evaluated based on the accomplishment of all associated measurable goals. The measurable goals were selected by analyzing the data collected during the previous permit and establishing program expectations for each associated BMP.

4.C. Best Management Practices and Measurable Goals

Best Management Practices

- A. **Development Project Plan Review:** Review development plans to ensure compliance with local post construction runoff guidelines and inclusion of appropriate permanent stormwater quality controls.
- B. **Regulatory Mechanisms:** Enforce local post construction stormwater management regulations to address discharges from new development and redevelopment projects which disturb one acre or more or are part of a common plan of development that disturb greater than or equal to one acre. Within two years from the permit effective date, the coalition will review and revise, if needed, its existing regulatory mechanisms to comply with the current permit requirements. Non-traditional MS4s included in the Coalition have standard operating procedures in place for addressing post construction stormwater discharges, in lieu of regulatory mechanisms.
- C. **Post Construction Control Inspections:** Conduct inspections of permanent stormwater quality control structures to ensure adequate long-term operation and maintenance of BMPs. Inspections are limited to the controls owned and operated by the permittees within the urbanized area.
- D. **Post Construction Procedures:** Develop and maintain standard operating procedures to document records of enforcement actions and procedures for ensuring long-term operation/maintenance of post construction stormwater control measures.

Measurable Goals & Record Keeping

BMP	Records to be Maintained	Measurable Goals
Development Project Plan Review	Number of development plans reviewed and approved with permanent post construction stormwater controls	Annually review 100% of the submitted development plans for the inclusion of post construction controls
Regulatory Mechanisms	Number of enforcement actions conducted regarding stormwater quality issues	Maintain ordinances and standard operating procedures in effect annually
Post Construction Control Inspections	Documentation of each inspection conducted of permittee owned permanent structural controls; any necessary maintenance actions or operational modifications will be noted in the inspection records	Inspect 100% of permittee owned permanent structural controls at least once per permit term
Post Construction Procedures	Standard operating procedures that address documentation of enforcement actions and long-term operation/maintenance of post construction stormwater control measures	Annually conduct 1 review of the standard operating procedures and perform any necessary updates

4.D. BMP Implementation Schedule and MS4 Responsibilities

BMP Implementation Schedule

BMP	Frequency of Action	Implementation Status
Development Project Plan Review	Annually	Full Implementation Continued
Regulatory Mechanisms	Annually	Full Implementation Continued
Post Construction Control Inspections	Once Per Permit Term	Full Implementation Continued
Post Construction Procedures	Annually	October 2020

*BMPs that are implemented on an annual basis will be conducted prior to October 1st of each year.

MS4 Responsibilities

BMP	Montgomery County	WJPA	City of Conroe
Development Project Plan Review			
Regulatory Mechanisms			
Post Construction Control Inspections			
Post Construction Procedures			

The Coalition is comprised of both traditional and non-traditional MS4s with different levels of enforcement authority, varying sizes and populations, and unique components/facilities for each entity. Therefore, every BMP included in this SWMP is not applicable for each entity in the Coalition. The raindrop symbol denotes which BMPs each entity will implement. Each participating member in the Coalition has agreed to limit the implementation of their applicable BMPs to the boundaries of their MS4 within the urbanized area.

Section 5: Pollution Prevention and Good Housekeeping for Municipal Operations

5.A. Permit Requirements

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 including but not limited to park and open space maintenance; street, road, or highway maintenance; fleet and building maintenance; stormwater system maintenance; new construction and land disturbances; municipal parking lots; vehicle and equipment maintenance and storage yards; waste transfer stations; and salt/sand storage locations.

5.B. Program Overview

The permittees have assessed the program elements that were described in the previous permit term, modified them as necessary, and developed new elements to continue reducing the discharge of pollutants from the MS4 to the MEP.

The Pollution Prevention and Good Housekeeping for Municipal Operations minimum control measure consists of BMPs that focus on employee training and on the prevention or reduction of pollutant runoff from municipal operations. Coalition employees responsible for municipal operations will attend training programs that focus on procedures for reducing the discharge of pollutants from activities such as park and open space maintenance, fleet and building maintenance, new construction/land disturbances, and stormwater system maintenance.

The Level 3 Small MS4 included in the Coalition has evaluated the Operation and Maintenance requirements established in TPDES General Permit TXR040000 and has decided that a street sweeping program is the best option to reduce trash, debris, and other stormwater pollutants from the local roadways. The decision was based on the fact that the City has the equipment available to implement the program and the majority of the permittee owned and operated areas (including streets, parking lots, and venues) are accessible with a street sweeper. The City has developed an implementation schedule for the program along with waste disposal procedures.

The Coalition implements good housekeeping measures and non-structural BMPs that reduce the discharge of pollutants from the following municipal operations:

- Park and open space maintenance
- Street, road, or highway maintenance
- Fleet and building maintenance
- Storm sewer system maintenance
- New construction and land disturbances
- Municipal parking lots
- Vehicle/equipment maintenance and storage yards
- Salt/sand storage locations

Within the urbanized area, the Coalition does not operate or maintain the following municipal operations:

- Waste transfer stations

The successfulness of the pollution prevention and good housekeeping program will be evaluated based on the accomplishment of all associated measurable goals. The measurable goals were selected by analyzing the data collected during the previous permit and establishing program expectations for each associated BMP.

5.C. Best Management Practices and Measurable Goals

Best Management Practices

- A. MS4 Facility Inventory/Map:** Maintain an inventory (and map) of applicable facilities and stormwater controls pursuant to the requirements established in Part III, Section B.5(b)(1) of TPDES General Permit TXR040000, that each permittee owns and operates within the urbanized area. Identify high priority facilities including at a minimum: maintenance yards, hazardous waste facilities, and fuel storage locations (the requirements for the development of an MS4 Facility Map and identification of high priority areas is limited to the Level 3 Small MS4 in the Coalition). The Level 3 MS4 will maintain documentation of their facility assessment results.
- B. Employee Training Program:** Conduct a training program to target employees that are involved in municipal operations applicable to the pollution prevention and good housekeeping MCM.
- C. Waste Disposal Procedures:** Maintain standard operating procedures for the appropriate disposal of waste materials from maintenance activities such as floatable collections, dredge spoils, and/or accumulated sediments.
- D. Contractor Oversight Procedures:** Maintain procedures that contractually require contractors hired by the permittee to perform maintenance activities on permittee-owned facilities to comply with all stormwater control measures, good housekeeping practices, and facility specific stormwater management operating procedures.
- E. Operation and Maintenance Activities:** Maintain and implement general pollution prevention plans that identify potential pollutants of concern and address stormwater discharges from permittee operation and maintenance activities; including: road and parking lot maintenance, bridge maintenance, cold weather operations, and right-of-way maintenance.
- F. Facility Inspections:** Conduct inspections of permittee owned facilities (including high priority facilities for the Level 3 MS4) to identify potential pollutants of concern and to evaluate the effectiveness of existing pollution prevention measures. If structural controls are necessary, maintenance of the controls must be performed by the permittee and consistent with maintaining the effectiveness of the BMP. The frequency of the inspections and how they will be conducted will be described in the standard operating procedures and pollution prevention plans.
- G. Waste/Litter Collection:** Conduct waste and/or litter collection to reduce floatable material discharges to the MS4.
- H. Municipal Operation Procedures:** Maintain standard operating procedures for inspecting/maintaining structural controls at municipal facilities and for conducting employee training for staff members involved in implementing pollution prevention/good housekeeping practices.
- I. Storm Sewer System Maintenance:** Conduct storm sewer system maintenance on catch basins, ditches, and other surface structures to reduce the collection of pollutants. Develop list of potential problem areas for increased inspections.
- J. Street Sweeping:** Conduct street sweeping in compliance with the established implementation schedule and waste disposal procedures.

- K. Facility Specific SOPs:** Develop and maintain facility specific standard operating procedures that include BMPs that will minimize the discharge of pollutants from each high priority permittee-owned facility. High priority facilities will be limited to the municipal facilities regulated under the TPDES Multi-Sector General Permit (TXR050000) and the associated SWP3s will be utilized as the facility specific SOPs.

Measurable Goals & Record Keeping

BMP	Records to be Maintained	Measurable Goals
MS4 Facility Inventory/Map	Inventory (and map for Level 3 Small MS4) of facilities and stormwater controls	Maintain an inventory (and map for Level 3 Small MS4) of 100% of the facilities and stormwater controls that each permittee owns and operates within the urbanized area annually
Employee Training Program	Number of training sessions conducted and the associated training materials/attendance lists	Conduct training for at least 80% of the MS4 field staff employees once per permit term
Waste Disposal Procedures	Standard operating procedures for waste disposal	Annually conduct 1 review of the standard operating procedures and perform any necessary updates
Contractor Oversight Procedures	Standard operating procedures for contractor oversight	Annually conduct 1 review of the standard operating procedures and perform any necessary updates
Operation and Maintenance Activities	General pollution prevention plan	Annually conduct 1 review of the general pollution prevention plan and perform any necessary updates
Facility Inspections	Log of facility inspections and the associated inspection documentation	Inspect 100% of the permittee owned facilities identified in the MS4 facility inventory once per permit term
Waste/Litter Collection	Estimated volume of waste/litter collected	Conduct waste/litter collection on an annual basis within the regulated area
Municipal Operation Procedures	Standard operating procedures for municipal operations	Annually conduct 1 review of the standard operating procedures and perform any necessary updates
Storm Sewer System Maintenance	Estimated linear feet of storm sewer system cleaned	Conduct storm sewer system maintenance on an annual basis
Street Sweeping	Estimated amount of lane miles swept	Conduct at least 1 sweeping cycle per year
Facility Specific SOPs	Number of facility specific SOPs developed	Conduct 1 review of the standard operating procedures (MSGP SWP3) once per permit term

5.D. BMP Implementation Schedule and MS4 Responsibilities

BMP Implementation Schedule

BMP	Frequency of Action	Implementation Status
MS4 Facility Inventory/Map	Annually	Full Implementation Continued
Employee Training Program	Once Per Permit Term	October 2022
Waste Disposal Procedures	Annually	Full Implementation Continued
Contractor Oversight Procedures	Annually	Full Implementation Continued
Operation and Maintenance Activities	Annually	Full Implementation Continued
Facility Inspections	Once Per Permit Term	October 2022
Waste/Litter Collection	Annually	Full Implementation Continued
Municipal Operation Procedures	Annually	October 2020
Storm Sewer System Maintenance	Annually	Full Implementation Continued
Street Sweeping	Annually	Full Implementation Continued
Facility Specific SOPs	Annually	October 2022

*BMPs that are implemented on an annual basis will be conducted prior to October 1st of each year.

MS4 Responsibilities

BMP	Montgomery County	WJPA	City of Conroe
MS4 Facility Inventory/Map			
Employee Training Program			
Waste Disposal Procedures			
Contractor Oversight Procedures			
Operation and Maintenance Activities			
Facility Inspections			
Waste/Litter Collection			
Municipal Operation Procedures			
Storm Sewer System Maintenance			
Street Sweeping			
Facility Specific SOPs			

The Coalition is comprised of both traditional and non-traditional MS4s with different levels of enforcement authority, varying sizes and populations, and unique components/facilities for each entity. Therefore, every BMP included in this SWMP is not applicable for each entity in the Coalition. The raindrop symbol denotes which BMPs each entity will implement. Each participating member in the Coalition has agreed to limit the implementation of their applicable BMPs to the boundaries of their MS4 within the urbanized area.

Section 6: Industrial Stormwater Sources

6.A. Permit Requirements

Permittees who operate level 4 small MS4s shall identify and control pollutants in stormwater discharges to the small MS4 from permittee's landfills, other treatment, storage, or disposal facilities for municipal waste (for example, transfer stations and incinerators); hazardous waste treatment, storage, disposal and recovery facilities and facilities that are subject to Emergency Planning and Community Right-to-Know Act (EPCRA) Title III, Section 313; and any other industrial or commercial discharge the permittee determines are contributing a substantial pollutant loading to the small MS4. The program must include priorities and procedures for inspections and for implementing control measures for such discharges.

6.B. Program Overview

N/A - only applies to Level 4 Small MS4s

Section 7: Municipal Construction Activities

7.A. Permit Requirements

The development of this MCM for construction activities, where the small MS4 is the site operator, is optional and provides an alternative to the MS4 operator seeking coverage under TPDES CGP, TXR150000 for each construction activity. 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 a construction site operator in Part I of this general permit. When developing this measure, permittees are required to meet all requirements of, and be consistent with, applicable effluent limitation guidelines for the Construction and Development industry (40 CFR Part 450), TPDES CGP TXR150000, and Part III.B.3 of this permit. The authorization to discharge under this MCM is limited to the regulated area, such as the portion of the small MS4 located within an UA or the area designated by TCEQ as requiring coverage. However, an MS4 operator may also utilize this MCM over additional portions of their small MS4 that are also in compliance with all of the MCMs listed in this general permit. This MCM must be developed as a part of the SWMP that is submitted with the NOI for permit coverage. If this MCM is developed after submitting the initial NOI, a NOC must be submitted notifying the executive director of this change, and identifying the geographical area or boundary where the activities will be conducted under the provisions of this general permit. Utilization of this MCM does not preclude a small MS4 from obtaining coverage under the TPDES CGP, TXR150000, or under an individual TPDES permit.

7.B. Program Overview

The permittees have elected **NOT** to utilize the optional 7th MCM.

Section 8: Impaired Water Bodies and Total Maximum Daily Load (TMDL) Requirements

8.A. Permit Requirements

Discharges of the pollutant(s) of concern to impaired water bodies for which there is a TCEQ and EPA approved TMDL are not eligible for this general permit unless they are consistent with the approved TMDL. A water body is impaired for purposes of the permit if it has been identified, pursuant to the latest TCEQ and EPA approved CWA 303(d) list or the Texas Integrated Report of Surface Water Quality for CWA Sections 305(b) and 303(d) which lists the category 4 and 5 water bodies, as not meeting Texas Surface Water Quality Standards.

The Permittee shall check annually, in conjunction with preparation of the annual report, whether an impaired water within its permitted area has been 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) which lists the category 4 and 5 water bodies. Within two years following the approval date of the new list(s) of impaired waters, the permittee shall comply with the requirements of Part II.D.4(b) (with the exception of (b)(1)c.), and shall identify any newly listed waters in the annual report (consistent with Part IV.B.2.f) and SWMP (consistent with Part III.A.2.f).

The permittee shall also determine whether the permitted discharge is directly to one or more water quality impaired water bodies where a TMDL has not yet been approved by TCEQ and EPA. If the permittee discharges directly into an impaired water body without an approved TMDL, the permittee shall perform the following activities: (Activities listed in Part II, Section D.4(b)(1) of TXR040000)

8.B. Program Overview

The Coalition has conducted an assessment of the applicable stream segments and identified impaired water bodies that receive MS4 discharges from their urbanized areas. The permittees have identified that the discharges from their MS4s are a potential source of the pollutants of concern. Focused BMPs have been developed for discharges to impaired water bodies **without** an approved TMDL, along with targeted control measures for discharges to water bodies **with** an approved TMDL. The targeted controls include activities related to sanitary sewer systems, on-site sewer facilities, illicit discharges, illegal dumping, animal sources, and residential education programs. The permittees will conduct an annual review to determine if any water bodies within the regulated area have been added to the EPA 303(d) list or the Texas Integrated Report of Surface Water Quality for CWA Sections 305(b) and 303(d). If during the course of the permit term a TMDL is developed and approved for a stream segment that did not have an existing TMDL, or a water body is listed as impaired, the applicable Coalition entities will begin implementation of the appropriate BMPs listed in this section. Table 8.1 includes a list of stream segments, current impairment status, pollutants of concern, and associated water quality benchmarks.

The benchmark for each pollutant of concern for water bodies with an approved TMDL were selected based on associated waste load allocations for permitted MS4 stormwater sources as identified in the applicable TMDL documents and/or implementation plans.

The Coalition will assess progress in achieving benchmarks and determining the effectiveness of BMPs by evaluating program implementation measures. The following indicators will be utilized to assess progress towards the benchmark(s): the number of illicit discharge sources identified or eliminated, number of public education opportunities conducted, and results of outfall inspection activities.

Table 8.1

Stream Segments	Impairment Status	Parameter(s)	Benchmark(s)/Waste Load Allocation	Applicable MS4s
Spring Creek – 1008	Approved TMDL	Bacteria	401.5 Billion CFU/day	WJPA and Montgomery County
	303(d) list	Dissolved Oxygen	N/A	
West Fork San Jacinto– 1004	Approved TMDL	Bacteria	42.6 Billion CFU/day	WJPA, Conroe, and Montgomery County
Crystal Creek – 1004D	Approved TMDL	Bacteria	42.6 Billion CFU/day	WJPA and Montgomery County
Caney Creek – 1010	Approved TMDL	Bacteria	43 Billion CFU/day	Montgomery County
Peach Creek – 1011	Approved TMDL	Bacteria	764 Billion CFU/day	Montgomery County

8.C. Best Management Practices and Measurable Goals

Best Management Practices

- A. **TMDL I-Plans:** Comply with existing implementation plans for discharges to impaired water bodies for which there is a TCEQ and EPA approved TMDL.
- B. **Sanitary Sewer Capital Improvement Projects:** Document and report on sanitary sewer system capital improvement projects that result in the reduction of sanitary sewer overflows, lift station improvements, and/or a reduction in the magnitude of stormwater inflow and infiltration into the sanitary sewer system.
- C. **Public Reporting:** Develop educational materials and website content focused on the identification and public reporting of sanitary sewer overflows, failing on-site sewer systems, illicit discharges, and illegal dumping.
- D. **Failing On-Site Sewer Systems:** Identify failing on-site sewer systems through citizen complaints and/or visual inspections conducted of the storm sewer system. Identified discharges from failing on-site sewer systems will be addressed as illicit discharges to the MS4 and enforcement actions will be implemented based on the permittee's legal authority.
- E. **Maintenance of On-Site Sewer Systems:** Develop media to facilitate proper maintenance of on-site sewer systems. Educational material options include brochures, flyers, and/or websites.
- F. **Outfall Inspections:** Utilize reports from MS4 field staff, citizens, and annual outfall inspections to identify illicit discharges and illegal dumping sites.

- G. Pet Waste Management:** Develop media to facilitate and promote proper pet waste management practices. Educational material options include flyers, brochures, and/or websites.
- H. Residential Education:** Develop media to facilitate public education for bacterial sources including residential sources, pet waste, proper disposal of fats, oils and greases, and decorative ponds. Educational material options include brochures, flyers, and/or websites.

Measurable Goals & Record Keeping

BMP	Records to be Maintained	Measurable Goals
TMDL I-Plans	TMDL I-Plan compliance evaluation forms	Conduct TMDL I-Plan compliance evaluation at least once per permit term
Sanitary Sewer Capital Improvement Projects	Number of sanitary sewer capital improvement projects completed	Conduct a review of current and upcoming sanitary sewer capital improvement projects once per permit term
Public Reporting	Number of reports received regarding stormwater quality issues	Develop/maintain on the stormwater website at least 1 type of media and/or materials annually to help facilitate public reporting of stormwater quality issues
Failing On-Site Sewer Systems	Number of failing on-site sewer systems identified	Inspect 20% of the outfalls within the urbanized area annually
Maintenance of On-Site Sewer Systems	Number of materials developed and/or posted on the stormwater website	Develop/maintain on the stormwater website at least 1 type of media/materials per year to promote the proper maintenance of on-site sewer systems
Outfall Inspections	Outfall data for each inspection conducted. Data will include at a minimum: date of inspection, location of outfall, and details concerning any identified discharges	Inspect 20% of the outfalls within the urbanized area annually
Pet Waste Management	Number of materials developed and/or posted on the stormwater website	Develop/maintain on the stormwater website at least 1 type of media/materials per year to promote the proper disposal of pet waste
Residential Education	Number of materials developed and/or posted on the stormwater website	Develop/maintain on the stormwater website at least 1 type of media/materials per year to help facilitate public education for residential bacterial sources

8.D. BMP Implementation Schedule and MS4 Responsibilities

BMP Implementation Schedule

BMP	Frequency of Action	Implementation Status
TMDL I-Plans	Once Per Permit Term	October 2022
Sanitary Sewer Capital Improvement Projects	Once Per Permit Term	October 2022
Public Reporting	Annually	Full Implementation Continued
Failing On-Site Sewer Systems	Annually	Full Implementation Continued
Maintenance of On-Site Sewer Systems	Annually	Full Implementation Continued
Outfall Inspections	Annually	Full Implementation Continued
Pet Waste Management	Annually	Full Implementation Continued
Residential Education	Annually	Full Implementation Continued

*BMPs that are implemented on an annual basis will be conducted prior to October 1st of each year.

MS4 Responsibilities

BMP	Montgomery County	WJPA	City of Conroe
TMDL I-Plans			
Sanitary Sewer Capital Improvement Projects			
Public Reporting			
Failing On-Site Sewer Systems			
Maintenance of On-Site Sewer Systems			
Outfall Inspections			
Pet Waste Management			
Residential Education			

The Coalition is comprised of both traditional and non-traditional MS4s with different levels of enforcement authority, varying sizes and populations, and unique components/facilities for each entity. Additionally, the MS4 responsibilities in this section are based on whether the permittees discharge to water bodies with an approved TMDL or an impairment listed on the 303(d) list. Therefore, every BMP included in this section is not applicable for each entity in the Coalition. The raindrop symbol denotes which BMPs each entity will implement. Each participating member in the Coalition has agreed to limit the implementation of their applicable BMPs to the boundaries of their MS4 within the urbanized area.