

Texas Pollutant Discharge Elimination System (TPDES) Permit:

Permit Status:

- National Pollutant Discharge Elimination System (NPDES) Permit required by the Clean Water Act of 1972 established the basic structure for regulating discharges of pollutants into the waters of the United States
- San Antonio Permit Number: TXS001901
- Issued and administered by the Environmental Protection Agency (EPA) – February 1, 1996
- Expired – January 31, 2001 (currently operating under the expired permit until the Texas Commission on Environmental Quality (TCEQ) issues new permit.)

Permit Renewal:

- EPA has delegated administration of the permit to the TCEQ thus making the new permit the TPDES permit (Texas Pollutant Discharge Elimination System)
- Permit renewal submitted – August 2000
- Application Renewal Permit No. – 04284
- Expect to receive final draft permit by end of 2003

Co-Permittees and permit area:

- City of San Antonio "City" – managing agency
- Texas Department of Transportation "TxDoT"
- San Antonio Water System "SAWS"
- All areas within the corporate boundary of the City served by the municipal separate storm sewer system (MS4) owned and operated by the permittees
- Two actual MS4 owners and operators:
 - City of San Antonio
 - Texas Department of Transportation

Permit Responsibilities:

- Compliance with permit conditions related to discharges from portions of the MS4 for which each permittee owns and operates
- Implementation of an approved Storm Water Management Program (SWMP)
- Annual reporting
- Collection of representative wet weather monitoring data
- Plan of action to assume responsibility for implementation of permit requirements on portions of the MS4 they own and operate if inter-jurisdictional agreements are dissolved.

Permit Obligations:

- Prevent or prohibit the discharge of pollutants into the MS4 to the Maximum Extent Practicable (MEP)
- Approved SWMP designed by the permittees determines what actions must be done by the entity to be in compliance.

City of San Antonio Storm Water Management Program (SWMP):

- Comprehensive SWMP includes pollution prevention measures, treatment or removal techniques, storm water monitoring, use of legal authority, and other appropriate means to control the quality of storm water discharged from the MS4
- Controls and activities in the SWMP identify areas of permittee's jurisdiction, and program element applicability on a specific area basis.

City of San Antonio Storm Water Management Program Requirements:

1. **Structural controls and storm water collection system operations:**
 - a. Capital improvements program for new systems and repair of existing systems
 - b. Performance based maintenance including grading channels, erosion control, concrete repair, facility cleaning, and vegetation control for MS4
 - c. Inspect underground portion of the MS4 using remote television camera

2. Areas of new development and significant redevelopment:

- d. Unified Development Code includes requirements and regulations related to storm water management and floodplain management
- e. Specific requirements in place for development occurring over the Edwards Aquifer Recharge Zone

3. Roadways:

- f. Street cleaning program
- g. Clean streets as soon as practical after sanding operations as a result of icing conditions
- h. Clean up after vehicle accidents

4. Flood control projects:

- i. Storm Water Engineering and Operations review all capital improvement projects for both quantity and quality issues
- j. Water quality focus group has been established to recommend regional water quality models to measure impact of new development

5. Pesticide, Herbicide, and Fertilizer Application:

- k. City continues to limit use of pesticides and herbicides and is constantly looking for more environmentally safe products to use
- l. City herbicide operators are licensed by Texas Structural Pest Control Board

6. Illicit Discharges and Improper Disposal:

- m. Non-storm water:
 - i. Monitoring program initiated in 1991 identifies underground breaks in the sanitary sewer system, illegal dumping and cross connection hookups of private sanitary sewer lateral lines
- n. Overflows and infiltration:
 - i. Illicit discharge connection program has helped to identify and initiate the repair of breaks in the sanitary sewer system
- o. Floatables:
 - i. City's floatable debris program is linked to public education and participation to prevent the problem at the source
 - ii. Four major components:

1. trash rakes on major structural flood control facilities
 2. downtown litter control program
 3. "vacuum" type street sweepers
 4. Storm Water Utility Volunteer/Restitution Program
 - p. Household hazardous waste and used motor vehicle fluids:
 - i. City collects and properly disposes through a collection point which operates Thursday from 10:00AM to 7:00PM; Friday from 7:00AM to 4:00PM; and the first Saturday of the month from 8:00AM to 1:00PM
 - q. MS4 screening and illicit inspections:
 - i. Illicit discharges are eliminated as expeditiously as possible
- 7. Spill prevention and response:**
- r. City Fire Department implements the Hazardous Material Spill Response Program
 - s. Storm Water Operations Division supports HazMat response operations as requested
- 8. Industrial and high risk runoff:**
- t. City conducts an industrial and high risk runoff inspection program on identified businesses
- 9. Construction site runoff:**
- u. Storm Water Compliance for Construction Site Activity Ordinance for sites over 5 acres in place and associated inspection program underway
 - v. Phase II rule in effect for sites from 1-5 acres
- 10. Public education/public participation**
- w. Memorandum of Cooperation dated March 7, 2003 delineates areas of responsibility between City of San Antonio and San Antonio Water System using a holistic approach
- 11. Monitoring program**
- x. Dry weather screening program
 - y. Wet weather screening program
 - z. Industrial and high risk runoff monitoring program

The City of San Antonio, as the largest owner and operator of its MS4, manages all aspects of the permit. Certain program requirements are contracted out to SAWS. SAWS also bills and collects the Storm Water Fee on their monthly billing statements to approximately 340,000 accounts.

Mandates: Storm water related services mandated by local government to improve quality of life, public health, welfare, and safety.