



Phase II (Small) MS4 Annual Report Requirements and Template 2019 TPDES General Permit Number TXR040000

Within 90 days of the end of each reporting year, operators of regulated Phase II Municipal Separate Storm Sewer Systems must submit an annual report to the Texas Commission on Environmental Quality. The reporting year may be the 12 months concurrent with the permit effective date, the permittee's fiscal year, or the calendar year. The reporting year selected must be identified in the original permit application submitted and remain consistent throughout the entire 5-year permit term. The annual report must describe activities conducted during the previous reporting year. If two or more MS4s share a common Stormwater Management Program (SWMP), all permittees must contribute to a system-wide annual report. Each permittee must sign and certify the annual report in accordance with 30 TAC §305.128 (relating to Signatories to Reports).

Report Content

Refer to Part IV, B.2 of the MS4 General Permit TXR040000 for annual report requirements.

Submit the annual report with a cover letter to ensure that the report reaches the Stormwater Team. See cover letter template (Example 5) of the instructions. The annual report must be submitted to the following address:

Texas Commission on Environmental Quality Stormwater Team Leader (MC-148)

P.O. Box 13087 Austin, Texas 78711-3087

Note: An annual report must be submitted even if the SWMP has not yet been approved by the TCEQ. A copy of the annual report must also be submitted to the appropriate TCEQ regional office.

In addition, if the permittee has a public website, the SWMP and annual report, or a summary of the annual report, must be posted on the permittee's website. The SWMP

must be posted no later than 30 days after the approval date, and the annual report no later than 30 days after the due date.

A. General Information

- 1. Provide the:
 - assigned authorization number TXR040{<u>453</u>}
 - reporting year (1, 2, 3, 4, or 5)
 - reporting option selected (i.e. calendar year, permit year, or fiscal year with last day of fiscal year [MM/DD])
 - beginning and end dates (01/01/2020 to 12/31/2021) of the annual reporting period
 - MS4 operator level:
 - traditional small MS4s level is based on the population served within the 2010 Urbanized Area (See Part II.A.5 of TXR040000 to determine MS4 level)
 - non-traditional small MS4s all non-traditional small MS4s are categorized as Level 2 regardless of population served within the Urbanized Area. These include counties, drainage districts, transportation entities, military bases, universities, colleges, correctional institutions, municipal utility districts, and other special districts
 - name of the permittee (owner/operator of the MS4, i.e. municipality, water district, etc.)
 - name, telephone number, mailing address, and e-mail address for the appropriate contact person

B. Status of Compliance with the MS4 GP and SWMP

The purpose of the annual report is to inform the TCEQ of the status of compliance with permit conditions and the approved SWMP, including the appropriateness of each best management practice (BMP) and the progress towards achieving the measurable goals for each BMP utilized or implemented during the reporting year. Please model the reported information after the examples provided.

 The report must include the status of compliance with permit conditions according to Part IV and V of the permit. Include compliance with the TCEQ-approved SWMP, compliance with recordkeeping and reporting requirements, compliance with permit eligibility requirements, and compliance with conducting an annual review of its SWMP in conjunction with preparation of the annual report as required in Part II E.4.

- Each MS4 is required to assess the appropriateness of each BMP in reducing the discharge of pollutants to the maximum extent practicable (MEP). Provide a detailed assessment of the appropriateness of the selected BMPs, including whether any of the selected BMPs are not appropriate. This information may be included in a tabular format as provided in the form (see Example 1 BMP Status).
- Describe progress towards achieving the goal of reducing the discharge of pollutants to the maximum extent practicable (MEP). If no progress was made or the BMP did not result in a reduction in pollutants, provide an explanation. This information must be presented in a tabular format as provided in the form (see Example 2 – Pollutant Reduction Analysis).
- 4. Measurable goals are objective markers or milestones the MS4 will use to track the progress and effectiveness of BMPs in reducing pollutants to the MEP. Provide an assessment of the appropriateness of the implementation of the measurable goals of each minimum control measure (MCM) and an evaluation of the success of implementation, including any obstacles or challenges in meeting the SWMP schedule, etc. **(see Example 3 – Measurable Goals Status).**

C. Stormwater Data Summary

Provide a summary of the results of information collected and analyzed during the reporting period, including monitoring data used to assess the success of the program at reducing the discharge of pollutants to the MEP. For example, did the MS4 conduct monitoring of stormwater quality, conduct visual inspections, clean the inlets, look for illicit discharge, etc..

D. Impaired Waterbodies and Total Maximum Daily Loads

If the receiving water body is listed as impaired in the latest Clean Water Act 303(d) list, or has an approved TMDL and is listed in the most recently approved **Texas Integrated Report Index of Water Quality Impairments**, refer to Part II.D for additional information about limitations on permit coverage, compliance with water quality standards, TMDL compliance requirements, and prohibited discharges (Edwards Aquifer Recharge Zone, specific watersheds, etc.).

Impaired waters are those that do not meet applicable water quality standards and are listed in the latest Clean Water Act 303(d) list or in the latest Texas Integrated Report Index of Water Quality Impairments. Pollutants of concern are those for which the water body is listed as impaired or has an approved TMDL. New sources or new discharges of the pollutant(s) of concern to impaired waters are not authorized by the permit unless otherwise allowable under 30 TAC Chapter 305 and applicable state law.

To determine if your receiving water has been listed as impaired, refer to the most recent **Texas Integrated Report Index of Water Quality Impairments** on the TCEQ website at < <u>Texas List of Impaired Waters</u> >.

Categories 4 and 5 together comprise the list of all impaired waters. Category 4 includes impaired waters for which TMDLs have already been adopted, or for which other management strategies are underway to improve water quality. Category 5 of the Integrated Report comprises the 303(d) List.

A TMDL is the maximum amount of a water quality contaminant that can be discharged into a body of surface water on a daily basis without causing an exceedance of surface water quality standards. For more information about TMDLs go to: < <u>TMDL Program</u> >.

For specific information on segments with TMDLs adopted by the TCEQ go to: < <u>Segments with TMDLs</u> >.

Note: Discharges of pollutant(s) of concern to impaired water bodies for which there is a TMDL implementation plan (I-Plan) are not eligible for coverage under this general permit <u>unless</u> they are consistent with the approved TMDL and the I-Plan. In order to be eligible for permit coverage, MS4 operators must incorporate into their SWMP the limitations, conditions, and requirements applicable to their discharges, including monitoring frequency and reporting as required by TCEQ rules. For discharges not eligible for coverage under this general permit, the discharger must apply for and receive an individual TPDES permit.

- 1. Determine each year if any receiving water body 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)*. Within two years following the approval date of the new list(s) of impaired waters, include any newly listed waters in the annual report and SWMP.
- 2. If applicable, explain in the worksheets any activities taken to address the discharge to impaired waterbodies, including any in-stream or outfall sampling results or other available data (include the source of the data) and a summary of the small MS4's BMPs used to address the pollutant of concern. Data may be acquired from the TCEQ, local river authorities, partnerships, and/or other local efforts as appropriate.
- 3. Include information about implementing targeted controls as required in Part II. D.4(a).
- 4. Report the benchmark and assessment activities. Annual reports should include the benchmark and the year(s) during the permit term that the MS4 conducted additional sampling or other assessment activities as required in Part II.D.4(a).

- 5. Add an analysis of how the selected BMPs will be effective in contributing to achieve the benchmark as required in Part II.D.4(a)(2).
- Implement focused BMPs to address impairment for bacteria as required in Part II.D.4(a)(5).
- 7. Assess progress in achieving the benchmark as required in Part II.D.4(a)(6).

E. Stormwater activities next reporting year

Use the table provided to describe any stormwater activities the MS4 operator has planned for the next reporting year as required in Part II.B.2(d).

F. SWMP Modifications and Additional Information

- 1. All permittees shall annually review, and update as necessary, the SWMP and MCM implementation procedures required by Part III.A.2 and Part IV.B.2(e).
- If changes have been made or are proposed to the SWMP, those modifications must be addressed in the annual report as required in Part IV.B.2 of the permit. If the TCEQ has notified you in writing that changes to the SWMP are necessary, those changes must be included in the report. Be sure to provide the following information in the explanation (see Example 4 – SWMP Modifications):
 - i. Describe changes made to or proposed for the SWMP during the reporting year, including changes to BMPs, measurable goals, dates, contacts, procedures, or details during the permit year.
 - ii. 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.

Note: A Notice of Change (NOC) is required if revisions are proposed to a SWMP already approved by the TCEQ. If the initial SWMP has not been approved, submit a letter describing the change(s) so that information may be considered during the SWMP review process. **If an NOC is required, it must be submitted separately to the address shown on the NOC form. Do not attach the NOC form to this report.**

G. Additional BMPs

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 as required in Part IV.B.2(f).

H. Additional Information

- 1. Indicate if the MS4 is relying on another entity to satisfy some of the permit obligations. Include the name of the other entity and an explanation of the elements of the SWMP that the entity is responsible for implementing as required in Part IV.B.2(g). A description of the agreement or written documentation of the agreement must be included in the SWMP.
- 2. If permittees share a common SWMP, list all associated authorization numbers, permittee names, and SWMP responsibilities of each permittee. Add more spaces or pages if needed.
- 3. Indicate if this is a system-wide annual report including information for all permittees. If "Yes," all represented permittees must sign the report in accordance with signatory requirements. The regulation governing who may sign an application form is at 30 Texas Administrative Code (TAC) §305.128.

I. Construction Activities

- Provide the number of construction activities that occurred in the jurisdictional area of the MS4 where the permittee was not the construction site operator as required in Part IV.B.2(i). This may be the actual number of Large Site Notices and Small Site Notices submitted to the MS4 operator by construction site operators.
- Does the permittee utilize the seventh MCM related to construction? To answer "Yes," this must have been requested on the Notice of Intent (NOI) or on an NOC and approved by the TCEQ.
 - If "Yes," then provide information about the number of municipal construction activities authorized under this general permit during the reporting period and the total number of acres disturbed for municipal construction projects.

J. Certification

The annual report must be signed by a principal executive officer or ranking elected official, or by a duly authorized representative as referenced in 30 TAC §305.128. The Delegation of Signatories to Reports (TCEQ Form 20403) can be located by visiting TCEQ's < FORMS > Web page and entering the form number.

For shared SWMPs, it is acceptable to submit separate signature pages for each operator participating in the shared SWMP, along with one copy of the system-wide annual report.

All certification pages must include an original, wet ink signature. Photocopies, scanned pages, and electronic signatures cannot be accepted.

Example 1– BMP Status

MCM(s)	ВМР	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
2: Illicit Discharge Detection and Elimination	Map all outfalls and all water bodies receiving discharges from the MS4	Yes, identified 10 new sources and eliminated 2.
2: Illicit Discharge Detection and Elimination	Perform field screening of outfalls	Yes, there was an increase in illegal discharge detection through screening.
3/4: Construction Site Control and Post-Construction Site Control	Implement stormwater ordinance for construction and post-construction runoff control	Yes, there were reductions in sanitary sewer overflows (SSOs).
5: Pollution Prevention & Good House-keeping for Municipal Operations	Train all public works and streets staff	Yes, conducted 5 educational opportunities for staff.
6. Industrialstormwater sources– if applicable	Inspect industrial facilities	Yes, there was a decrease in illegal dumping into water bodies.

Example 2 - Pollutant Reduction Analysis

мсм	ВМР	Information Used	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
1	1.1 Public education	Utility bill stuffers	300	Brochures	No. Though this BMP does not result in a direct reduction of pollutants, educating the citizens will eventually reduce litter, hence pollutants.
2	2.4 Dry weather screening	Outfalls	20	Inspections	Yes. When illicit discharges are observed, immediate action can be taken to remove the pollutant and track the source.
3	3.3 Construction site inspection	Construction sites	5	Inspections	Yes. By inspecting the contractor-owned construction sites, we can evaluate if proper BMPs are in place to reduce sediment discharge and erosion.
4	4.8 Construction plan review	Plans	5	Reviews	No. The pollutants will be reduced over time as the permanent post-construction BMPs are utilized.

Example 3 – Measurable Goals Status

МСМ	Measurable Goal(s)	Explain progress toward goal or how goal was achieved
1	Provide utility bill inserts to each utility customer at least once each year	Met goal – mailed 86,192 inserts with March monthly utility bill.
1	Conduct one public meeting or city-wide cleanup day each year	Exceeded goal- conducted one public meeting and two cleanup days.
2	Map 25% of outfalls and 50% of receiving waters during Year 1 (same as milestone)	Met goal – mapped 20 outfalls out of 80 and 3 of 5 receiving waters.
3	Perform site inspections on 25% of all active construction sites	Did not meet goal - number of construction sites in city was far above normal for the year. Inspected 20% - 137 out of 548.
3	Respond to 100% of construction complaints received	Met goal – responded to 193 of 193 construction activity complaints.
4	Review all site plans submitted for new development projects	Met goal – reviewed 127 of 127 site plans submitted.
5	Sweep 50% of roads each year	Exceeded goal – swept 80% of all city streets.
5	Send two employees each year to a stormwater training workshop	Met goal – two employees attended stormwater training this year.
6	Inspect 5 industrial facilities	Met goal – inspected 5 industrial facilities.

Example 4- SWMP Modification

MCM(s)	Measurable Goal(s) or BMP(s)	Implemented or Proposed Changes (Submit NOC as needed)
3	Measurable Goal - perform site inspections on 25% of all active construction sites	Revise goal to perform site inspections on 25% of all active construction sites, or a minimum of 50 sites per year. Submitted separate NOC on 3/14/2015.
5	Measurable Goal- update inventory list quarterly	Revised Goal – update inventory list annually. Submitted separate NOC on 3/14/2015.
1	BMP 1.8	Change the implementation schedule from January 2015 to completion in May 2015 due to staff changes. Submitted Separate NOC on 01/05/2015.
2	BMP 2.4	Delete ineffective BMP – Dye Testing, and replace with effective BMP - Smoke Testing, to identify sanitary sewer system leaks. Submitted separate NOC on 06/12/2015.

Example 5 – Cover Letter Template

Submit on letterhead, and include:

- the mail date of the letter and report;
- the MS4 name and authorization number;
- the TCEQ region number where the MS4 sent a copy of the annual report; and
- the name(s) and authorization number(s) of other MS4s contributing to the SWMP if applicable.

Letterhead

{Date of Letter}

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 {*Name of Small MS4*} TPDES Authorization: TXR040 {*include MS4's unique 3-digit authorization number*}

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 TXR040{XXX} for the {name of the Small MS4}.

The annual report is for Year_____ (select the appropriate number 1, 2, 3, 4, or 5). The reporting period's beginning month/day/year and ending month/day/year.

A separate Notice of Change [has been / has not been / will be] submitted based on the fact that changes [have been / have not been] proposed for the next permit year. The Notice of Change was submitted to TCEQ's Applications Review and Processing Team (MC-148): (Select the addressed used)

BY REGULAR U.S. MAIL: Texas Commission on Environmental Quality Applications Review and Processing Team (MC-148) P.O. Box 13087 Austin, Texas 78711-3087

BY OVERNIGHT/EXPRESS MAIL: Texas Commission on Environmental Quality Applications Review and Processing Team (MC-148) 12100 Park 35 Circle Austin, TX 78753

As required by the general permit, a copy of the report has been mailed to the TCEQ's regional office $\{number\}$ in $\{city\}$, Texas.

Sincerely,

{Name and Title}

Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number TXR040000

A. General Information

Authorization Number: TXR040{453} 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: _2020_____ Fiscal Year: ______ Last day of fiscal year: (_____) Reporting period beginning date: (month/date/year) ______ January 1, 2020 Reporting period end date: (month/date/year) ______ December 31, 2020_____ MS4 Operator Level: ______ Name of MS4: __City of Bee Cave_____ Contact Name: ______ Kevin Sawtelle, P.E.____ Telephone Number: ______ 512 767 6615_____ Mailing Address: ______ 4000 Galleria Parkway, Bee Cave, TX 78738_____ E-mail Address: ksawtelle@beecavetexas.gov A copy of the annual report was submitted to the TCEQ Region: YES_X_NO____

Region the annual report was submitted to: TCEQ Region <u>**11 (Austin)**</u>

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.	Х		The City has met goals for permit year 1 of the 2019- 2024 permit term. This permit renewal still has not been formally approved by TCEQ.
Permittee is currently in compliance with recordkeeping and reporting requirements.	Х		The City is in compliance with recordkeeping and reporting.
Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.).	х		TMDL requirement is not warranted. The City met all applicable requirements.
Permittee conducted an annual review of its SWMP in conjunction with preparation of the annual report	х		The City did perform a review of SWMP in 2020

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)	ВМР	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
1	1. Distribute Educational Material	Yes - Administratively approved by TCEQ and appropriate for Public Education, Outreach, and Involvement. City has identified a target audience and summarized plan of action in the past, acquired educational materials from different sources, including EPA and TCEQ. The City has also prepared brochures for stormwater quality issues which are available in hard copy at the Planning & Development Department front desk window. The City distributed materials among attendees of City Council and other Boards meetings. We also include appropriate educational materials at the time of site, building, and septic permit issuance. The City has been distributing educational materials to the general citizen through the City's constant contact and Homeowner's Association distribution lists. Educational materials are available on the City's website including a dedicated MS4 page explaining the importance of clean stormwater and tips for citizens on how to positively contribute. The City published articles in the monthly newsletter published by the library department. Furthermore, The City is utilizing digital tools for public education and awareness. On our digital message board, we have been displaying nine (9) slides about stormwater, which are on continuous rotation during business hours. These efforts are part of City awareness campaign towards reducing the discharge of pollutants in stormwater.

1, 2, 3	2.	Stormwater Reporting by Public	Yes - Administratively approved by TCEQ and appropriate for Public Education, Outreach, and Involvement; Illicit Discharge and Elimination, and Construction Site Runoff Control. The City has identified and summarized plan of action in the past. A reporting line (phone and e-mail address) has been established. Report form and contact information is available on the City's website and also on the distributed materials. The City has developed internal procedures for receiving calls/e-mails, documentation of incidents/complaints and corrective actions, dispatching to appropriate personnel/inspector, and communicating with responsible parties to resolve any issues. This streamlined process is facilitating the incidence of reporting and remedial actions within shortest period of time. The City received no reports in 2020, however The City reviewed general needs for reporting line improvement, and areas requiring additional educational or enforcement effort to protect stormwater quality.
1	3.	Public Involvement Opportunities	Yes - Administratively approved by TCEQ and appropriate for Public Education, Outreach, and Involvement. Administratively identified and summarized plan of action. Typically, the City assists in promoting the Lake Travis Regional Re-use and Recycling Center (LTRRRC) annual household products/hazardous waste collection events, however due to COVID-19 the LTRRC did not hold any collection events in 2020. Additionally, the City held two creek clean-up days early in 2020.
2, 5	4.	Storm Sewer System Map and Facility Inventory	Yes - Administratively approved by TCEQ and appropriate for Illicit Discharge and Elimination. The City has a map for location of water quality ponds (outfalls) and related infrastructure as well as surface water bodies. The map identifies water quality ponds and roadways by responsible parties for maintenance. Staff can communicate with appropriate parties using information in internal database if situation arises to address concern immediately. The City documented location of all outfalls that discharge into waters of the U.S.

2	5. IDDE Response, Investigation, Inspections	Yes - Administratively approved by TCEQ and appropriate for Illicit Discharge and Elimination. The City has identified personnel who need to attend trainings, including plan reviewers, building inspectors, code enforcement officers, and administrative staff responsible for the stormwater reporting line.
3, 4	6. Plan Review	Yes - Administratively approved by TCEQ and appropriate for Post- Construction Stormwater Management. Site or subdivision development plans includes sheets for erosion and sedimentation control plan, temporary and permanent stabilization, tree protections, storm sewer plan, water quality control plans, etc. which staff review prior to approval. Staff also review a maintenance plan for water quality controls and integrated pest management plan, concurrently. The review ensures general conformance with stormwater regulations during and after construction. Additionally, the review confirms development will have appropriate water quality control to meet the high level (95% TSS, TP, O&G) of pollutant removal requirements established by the
2, 3	7. Construction Site Inspection and Enforcement	Yes - Administratively approved by TCEQ and appropriate for Construction Site Runoff Control. The City typically receives SW3P inspection report weekly and after every 0.5" rainfall events. Staff communicated with site supervisors accordingly after reviewing reports. Staff generally visits active site on a routine basis. Staff also visits sites with issues frequently. Four City staff have made approximately 1700 visits in 2020.

4	8.	Structural Control Maintenance, Inspection, and Enforcement	Yes - Administratively approved by TCEQ and appropriate for Post- Construction Stormwater Management. Current City Code of Ordinance requires a 'Maintenance Plan' for all structural water quality control facilities. As part of an annual inspection process, staff visit subject facilities, notify the responsible parties of findings, and enforce maintenance activities, when necessary. Staff visited thirty-eight facilities in 2020, of which 15 required more than routine maintenance. No formal 'Notices of Violation' were issued. Annual inspections ensure long-term operation and maintenance which is key to maintain stormwater quality. Additionally, the City adopted an ordinance (2015) requiring functionality inspections once every 5 years. This ordinance requires a licensed professional to visit the facilities and submit a report to the City listing conditions observed and any recommended maintenance. The City utilizes enforcement action to ensure the operator completes recommended maintenance activities to improve functionality to the structural control in question. These procedures are adequate to reduce pollutant discharge and is documented by the City.
5	9.	Maintenance Contractor Oversight	Yes - Administratively approved by TCEQ and appropriate for pollution prevention and good housekeeping. City staff maintain regular communication with contractor's site supervisors to address any issues. Staff explain all stormwater related facts, restrictions, and necessary measures during pre-construction meeting and subsequent site visits, so contractors are aware of stormwater requirements and make their best efforts to eliminate any potential discharge. City oversight procedures have been developed and are being implemented. The City documents actions taken to oversee contractor activities, as well as any enforcement action towards contractors.

5	10. Municipal Operations and Maintenance Activity	Yes - Administratively approved by TCEQ and appropriate for pollution prevention and good housekeeping. The City has identified activities and procedures for regular maintenance activities. Appropriate pollution prevention and housekeeping measures have been implemented. Maintenance crews are mindful of restrictions and requirements to stay in compliance. City began implementation of scheduled assessments and inspections of municipal operation and maintenance activities. Currently, no City
		facilities are regulated by TXR050000 for industrial stormwater discharge.
5	 Municipal Operations Inspection Program and Procedures 	Yes - Administratively approved by TCEQ and appropriate for pollution prevention and good housekeeping. The City has begun to identify procedures for regular maintenance activities. Appropriate pollution prevention and housekeeping measures have been implemented. Currently, no City facilities are regulated by TXR050000 for industrial stormwater discharge.
5	12. Disposal of Collected Waste	Yes - Administratively approved by TCEQ and appropriate for pollution prevention and good housekeeping. City has written procedures for disposal of collected waste. City properly disposes of collected wastes to comply with all applicable requirements.
2, 3, 5	13. Staff Training	Yes - Administratively approved by TCEQ and appropriate for Pollution Prevention and Good Housekeeping. The City has identified municipal operations that have potential to impact stormwater. The City's maintenance employees have sufficient experience in municipal operations and maintenance activities, which include implementation of pollution prevention and good housekeeping practices. Additionally, engineering staff regularly attends water quality/engineering conferences to stay up to date with trends in the industry.

2, 3, 4	14. Stormwater Quality	Yes - Administratively approved by TCEQ and appropriate for Post-
_, _, .	Ordinances	Construction Stormwater Management. Current City Code of
		Ordinance contains sufficient provisions. Staff visits the site at the
		end of construction and then annually for 2 years to visually verify
		the condition of permanent stabilization and water quality control
		facilities. Furthermore, staff conduct inspections of permanent
		water quality control facilities (ponds) annually and notify the
		responsible party if any maintenance is required and enforce such
		maintenance. Additionally, the City requires responsible parties to
		conduct a functionality inspection once every 5 years to ensure
		those facilities are functioning properly and to identify adjustments
		or maintenance work necessary to improve functionality. The City
		adopted and implemented policies and procedures. All procedures
		and measures assist the City in achieving higher water quality
		control standards and limit any pollutants leaving sites.

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**):

мсм	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
1	1. Distribute Educational Material	Window/Lobby MS4 Handouts Materials Distributed at Events	47	Brochures	No. Though this BMP does not result in a direst reduction of pollutants, educating citizens will eventually reduce pollutants. Additionally, it provides reporting information for proper response to issues.

1, 2, 3	2. Stormwater Reporting Line	City website and additional communication platforms	0	Call logs	Yes. The streamlined reporting line and rapid action plan prevented potential pollutants from entering the system and water bodies. The City received no calls in 2020
1	3. Waste Clean-Up	Creek Clean-ups	2	Events	Yes. Creek cleanup days reduced potential runoff of pollutants downstream.
2, 5	4. Storm Sewer System Map and Facility Inventory	Outfalls	New: 2 Total: 125	# of Outfalls Tracked	Yes. Allows for observation of illicit discharge and for prompt action to be taken to remediate and track sources of illicit discharges.
2	5. IDDE Response, Investigation, Inspections	IDDE Inspection Logs	1	Inspections Investigations	Yes. City staff inspect sites and investigate issues to prevent the discharge of pollutants.
3, 4	6. Plan Review	Construction Plan Reviews	47	Projects Reviews (involving E&S Plans/WQ Plans)	Yes. Review of erosion and sedimentation control plans/WQ BMP plans directly contribute to the reduction of pollutants leaving construction sites and achieving final stabilization in all disturbed areas.
2, 3	7. Construction Site Inspection and Enforcement	Construction Site Inspection Logs	1694	Inspections	Yes. Staff has inspected residential and non-residential construction sites to confirm sufficient erosion and sedimentation controls and whether adjustments are needed to reduce erosion and sediment discharge from sites. Staff also inspect final stabilization of construction sites.

4	8. Structural Control Maintenance	Structural Control Inspections	38	Structural Water Quality Control Inspections	Yes. City staff inspect developed projects annually to confirm water quality ponds are properly maintained. This ensures proper functionality of structural controls, which is an integral part of pollutant reduction.
5	9. Maintenance Contractor Oversight	Contractor Oversight Records	118	Registered Contractors performed work in 2020	Yes. By regular communication via e-mail, phone, and construction site inspections; City staff evaluate the proper implementation of BMPs. City staff also oversee home building phases and communicate with contractors, as needed.
5	10. Municipal Operations and Maintenance Activity	The City implemented updates to GIS databases, including but not limited to: creek buffers, roadway maintenance information, storm sewers, and septic systems within the City	1	Asset Inventory Updated	Yes. The city and its service providers implemented good housekeeping practices to reduce pollutants. Maintaining current public/private asset databases allows for rapid assessment of potential illicit discharge and provides a comprehensive picture of stormwater facilities. The City has also started to explore options for BIM software's to further catalog public assets. Additionally, City fleet vehicles are washed and serviced at facilities that implement water re-use practices and state-mandated safe disposal practices. The City also provide single stream recycling receptacles at all municipal buildings.

5	11. Municipal Operations Inspection Program and Procedures	Weekly Inspections	52	Inspections	Yes. City staff inspects city owned parks/trails on a weekly basis to ensure that local areas of erosion are not present.
5	12. Disposal of Collected Waste	Disposal Records	Approx. 500	Lbs.	Yes. City has properly disposed of all collected waste via its service provider which ensures reduction of pollutants.
2, 3, 5	13. Staff Training	Seminars/Classes	3	Courses	Yes. City staff attended several college courses to gained knowledge regarding current water quality industry trends, source identification, procedures of resolution, etc., which are essential to reduce non-point source pollutants and improve stormwater quality.
2, 3, 4	14. Stormwater Quality Ordinances	City Code of Ordinance	27	Prohibited Discharges	Yes. Existing ordinance specifies NPDES/TPDES permits and appropriate prohibitions, ensuring reduction of illicit discharges.

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):**

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved.
		If goal was not accomplished, please explain.

MCM 1 BMP 1. Distribute Educational Material	Distribute educational material about stormwater pollution prevention and the hazards associated with illegal discharges and improper disposal of waste by December of each year	Met Goal – City has distributed educational materials to general public, businesses, and contractors on a regular basis by different means. City has documented target audience, distributed materials, methods, and procedures for distribution. City also documented updates to the program.
MCMs 1/2/3 BMP 2. Stormwater Reporting Line	 Facilitate public reporting of stormwater quality concerns and illicit discharges. i. Maintain at least 1 mechanism for the public to submit stormwater quality reports. ii. Ensure the stormwater reporting mechanism is publicly accessible at least 95% of the time. iii. Respond to stormwater quality reports within 2 business days; if the public report concerns an immediate threat to human health or the environment, respond within 24 hours of notification. 	Met Goal – The educational materials have the reporting line (phone and e-mail address) information to inform the public about its existence. An online reporting form is posted on the City's dedicated MS4 webpage with alternative contact information. City has developed internal procedures for receiving calls/e-mails, documentation of incidents/complaints, corrective actions, dispatching to appropriate personnel/inspector, and communicating with responsible parties to resolve any issues. This streamlined process facilitates the incident reporting and allows remedial action to occur promptly. Reporting form and contact information is available in the City's website. City has documented calls and incidents. Zero (0) calls were received during 2020.

MCM 1 BMP 3. Public Involvement Opportunities	 A.Facilitate public involvement and education for stormwater pollution prevention activities by December of each year. i.Provide at least 4 public involvement opportunities for stormwater pollution prevention. ii. Engage at least 2 target audiences. B. Consider and facilitate public input in the implementation of the program. i. Provide one opportunity for public to provide feedback on the SWMP during the public comment period. 	Met Goal – The City is part of the Lake Travis Regional Re- use and Recycling Center (LTRRRC). The center receives household products and hazardous waste on scheduled events. Typically two (2) such scheduled collection event take place yearly, however due to COVID-19 no such events were scheduled in 2020 . Additionally, the City hosted creek cleanup volunteer events. Two (2) such events took place in 2020
MCM 2, 5 BMP 4. Storm Sewer System Map	 A. Develop one TCEQ approved approach to evaluate the City's current MS4 system map, including the development of an inventory of City-owned facilities and structural controls as defined in the permit. i. Document the approach in one memo to file by December. B. Map 100% of Waters of the U.S. directly receiving stormwater discharges from the MS4 by December. 	Met Goal – City has a map for location of water quality ponds (outfalls) and related infrastructure as well as surface water bodies. The map contains all outfall locations within City and its ETJ. The map identifies water quality ponds and roadways by responsible parties for maintenance. City staff communicate directly with appropriate parties using information and internal database to address any issues immediately. City documented location of all outfalls that discharge into waters of the U.S. City documented location and name of surface water receiving discharges. City documented source of information used to develop map.

MCM 2 BMP 5. Illicit Discharge and Spill Inspection, Investigation, and Response	Continue illicit discharge response and investigation activities including documenting the events on the investigation form.	Met Goal – City has procedure policy in place for IDDE response, field investigation, and inspection to identify the source of discharge, elimination of the discharge, and enforcing corrective measures within shortest possible time. In 2020, City received one (1) complaint which were addressed. The procedure includes process for source investigation and elimination. It requires City will prioritize investigation of discharge based on their relative risk of pollution. For example, sanitary sewage and chemical plant spills will be considered a high priority discharge. City has documented investigations with the date observed, elimination method, and date resolved.
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		Met Goal - Site development plan includes sheets for
		erosion and sedimentation control plan, temporary and
		permanent stabilization, water quality control plans etc.
	A. Conduct engineering and	which staff review and verify prior to approval. City code
	construction plan reviews of	requires removal of minimum 95% developed TSS, TP,
	site development and	and Oil & Grease pollutant loads. Furthermore, code
	redevelopment projects to the	established a 'Water Quality Buffer Zone' paralleling each
	standards set forth in City	side of qualifying waterways throughout the City. Code
	ordinances and design criteria	also requires a certain amount of open space within a
	to evaluate potential water	subdivision. Development activities are generally
	quality impacts during	prohibited within this open space area. These higher
	construction and post-	standards and restrictions improve overall stormwater
MCM 3, 4	construction.	quality. City of Austin 'Watershed Protection
		Department' publishes a report on 'Environmental
BMP 6. Plan Review	i. Review 100% of plans	Integrity Index' for creeks and streams in this area.
	submitted to the City	Historically, Little Barton Creek ranks near the top (2nd
	prior to final	best in overall scores).
	acceptance of plans.	
		City adjusted review process to streamline it. Water
	ii. Maintain one copy of	quality control measures are being reviewed in every
	final plan review	phase including Concept Plan and Site Plan. As part of
	documentation for	final plat review, City staff ensures that drainage and
	100% of approved	water quality control facilities are located within an
	construction plans.	easement. Final plat includes notes directing restriction
		and maintenance requirements for those easements. City
		also requires developers to record a maintenance plan
		with Travis County.

	A. Conduct inspections of	
	priority construction sites (e.g.	
	site size, contractor	
	performance history, sensitivity	
	of receiving waters) within the	
	MS4 according to City	
	procedures and ordinances.	
	i. Conduct at least one	
	site inspection of 100%	
	of identified active	
	priority construction	
	sites, including	Met Goal – City typically receives SW3P inspection report
	evaluation of coverage	weekly and after 0.5-inch rainfall events. City staff review
	under the Construction	the report immediately and communicate with site
	General Permit	supervisors accordingly. If maintenance is required, City
MCM 2, 3	(TXR0150000).	staff require the supervisor to complete work. City staff
		visit active sites on routine basis. City staff also frequently
BMP 7. Construction	ii. Maintain one copy of	visit sites with known issues. City staff enforce
Site Inspection and	each completed	appropriate measures, as needed.
Enforcement	construction site	
	inspection report.	City documented inspections and instances of
		enforcement. Four (4) City staff made approximately
	B. Enforce correction for	1700 visits in 2020. City also documented reason(s) for
	violations of City ordinance	non-compliance and follow-up inspections.
	provisions governing	
	construction site operations	
	and TPDES Construction	
	General Permit TXR150000.	
	i. Conduct follow-up	
	action (i.e. inspection	
	or enforcement) for	
	100% of sites with	
	observed violations	
	within 10 business	
	days.	

MCM 4 BMP 8. Structural Control Maintenance, Inspection, and	A. Develop one TCEQ approved approach to evaluate the City's current program for inspection and maintenance of City- owned structural controls and enforcement of maintenance requirements for privately- owned post- construction	Met Goal – Current City Code of Ordinance requires a 'Maintenance Plan' for all structural water quality control facilities. City requires developers to record the maintenance plan with Travis County. As part of the annual inspection, City staff visit the subject facilities, notify responsible parties, and enforce necessary maintenance. Identified maintenance activities are complete for most facilities, with some currently in progress. Additionally, City has adopted an ordinance (in 2015) requiring functionality inspections once every 5 years. This ordinance requires a licensed professional to visit the facilities and submit a report to City listing conditions observed and any maintenance that is required. City then enforces completion of maintenance activities by the operator to ensure facilities are performing their functions and there is no increase in
Enforcement	BMPs. i. Document the approach in one memo to file by December.	pollutant loads. Furthermore, City is responsible for regular maintenance of two facilities. The City has a consulting civil engineering firm specializing in stormwater on retainer in the event we need a second opinion and modification to structural controls, but generally are able to resolve most design/troubleshooting and maintenance in-house.
		City documented structural control inspection and maintenance activities.

MCM 5 BMP 9. Maintenance Contractor Oversight	 A. Utilize standard contract language requiring compliance with City stormwater pollution prevention measures, good housekeeping practices, and facility specific stormwater management operating procedures on 100% of new or renewed service agreements with contractors hired to perform City maintenance activities with the potential to impact stormwater quality. B. Investigate stormwater quality reports concerning contracted maintenance activities within 2 business days of receipt of report. i. Maintain one copy of inspection documentation notes and follow-up actions, as necessary. 	Met Goal – City has established procedure and practice of communicating with contractors via e-mail and phone, and inspecting the contractor operated construction sites. By appropriate notes and permitting process, the City ensures compliance with stormwater related regulations and standard practices by contractors. Developer/contractors are required to post a fiscal security before receiving a permit. City releases posted fiscal security (bonds) only after satisfactory completion of projects. Each contractor must be registered with City. Submitting insurance, trade license, and other documents is required as part of the registration process. Additional permits are required to work within City' right-of-way. City documented actions taken to oversee contractor activities.
MCM 5 BMP 10. Municipal Operations and Maintenance Activity	A. Develop one TCEQ approved approach to evaluate the City's current operations and maintenance activities for their potential to discharge pollutants in stormwater. i. Document the approach in one memo to file by December.	Met Goal – The City furthered internal databases of public/private infrastructure assets. Additionally, the City's service provider 'Texas Disposal System' collects trash/letters and pet waste from City parks and uses existing recycle station. City's service provider 'Clean Spaces' collects trash/litter from street right-of-way once a week and conduct mowing operation monthly. Street sweeping contractors sweep streets on a routine and necessary basis. City conducts cleaning of storm sewer drains/culverts and drainage ditches maintenance as needed including removal of deposited sediments/trash. City documented date and location of assessments and inspections completed.

A. Dispose of waste material in accordance with Title 30 of Texas Administrative Code Chapters 330 or 335, as applicable.Met Goal – City properly disposes of all collected waste from publicly maintained facilities and infrastructure with the assistance of a service provider.MCM 5i. Maintain one copy of associated waste disposal documentation (e.g. waste manifests, contractor invoices, etc.) and estimate the amount of wasteMet Goal – City properly disposes of all collected waste from publicly maintained facilities and infrastructure with the assistance of a service provider.	MCM 5 BMP 11. Municipal Operations Inspection Program and Procedures	A. Develop one TCEQ approved approach to evaluate the City's current procedures for visual inspections of pollution prevention measures at City- owned facilities by December. i. Document the implementation approach in one memo to file.	Met Goal – The City implemented a new task management/asset management system to assist with efficient municipal operations. With the assistance of the Productive Parks management software the City documents date and location of assessments and inspections completed.
material disposed of by December of each	BMP 12. Disposal of	accordance with Title 30 of Texas Administrative Code Chapters 330 or 335, as applicable. i. Maintain one copy of associated waste disposal documentation (e.g. waste manifests, contractor invoices, etc.) and estimate the amount of waste material disposed of by	from publicly maintained facilities and infrastructure with the assistance of a service provider. City maintains written procedures for proper waste

MCM 5 BMP 13. Staff Training	 A. Conduct training for staff with responsibilities relating to activities with potential impacts to stormwater quality. i. Provide general awareness-level training for pollution prevention and good housekeeping to staff at least once annually. ii. Provide job-specific stormwater quality and pollution prevention training to 100% of staff responsible for performing those activities in advance of conducting unsupervised responsibilities. iii. Provide job-specific stormwater quality and pollution prevention training to 100% of staff responsible for performing those activities within 12 months of date of hire or transfer to new role. iv. Maintain one copy of training documentation onsite or in SWMP by December of each year. 	Met Goal – City staff attended relevant national conferences, seminars, and webinars offered by different organizations. City documented training program materials, attendance lists, date of training, trainer/training provider, etc.
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MCM 2, 3, 5 BMP 14. Stormwater Quality Ordinances	A. Develop one TCEQ approved approach to evaluate the City's current ordinances for compliance with illicit discharge prohibition, construction site stormwater runoff control, and post- construction permit requirements by December.	Met Goal - Current City Code of Ordinance contains sufficient provisions. City staff visit sites at the end of construction and annually for 2 years to visually verify the condition of final stabilization and water quality control facilities including ponds and vegetative filter strip areas. Furthermore, City staff conduct inspections of the permanent water quality control facilities (ponds) annually and notifies the responsible party if any maintenance is required. Overall, the City has had great success working directly with parties where short-term maintenance and long-term improvement are required. In instances of non-responsiveness, we issue "Notices of Violation" and then if necessary, we can proceed with legal notice and ultimately enforcement through the		
	i. Document the	Additionally, City requires the responsible parties to conduct a functionality inspection once every 5 years to ensure those facilities are working in intended manner and to identify if any adjustments or maintenance work are necessary to improve functionality. All these procedures and measures help the City in achieving higher water quality control standards and limit any pollutants leaving sites.		

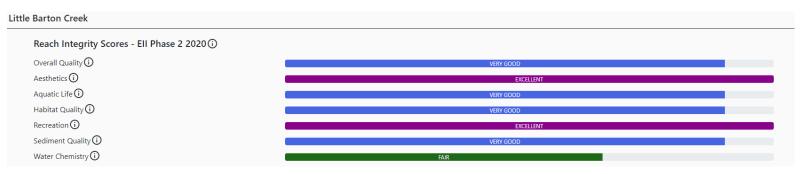
C. Stormwater Data Summary

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.?

<u>Summary</u>

Approximately 78% of the full-purpose city limits/extraterritorial jurisdiction of Bee Cave sits within the Barton Creek/Little Barton Creek Watershed. The vast majority of development in the City drains to the Little Barton Creek Watershed. The City of Austin regularly takes water quality sampling data and assesses the quality of watersheds throughout the City on a quadrennial basis. Their analyses assesses a variety of

parameters to generate an overall Watershed Quality Score. Little Barton Creek received an overall watershed quality score of Very Good in 2020 (see below image). More than 245 measured parameters at three separate sampling locations (within the watershed) were utilized to assess the watershed quality. Should TCEQ require back-up of the data utilized in the analyses, the City of Bee Cave can provide it.



The City of Bee Cave regularly inspects active construction sites to ensure that erosion and sedimentation controls and ensure that E&S controls are properly being maintained.

D.Impaired Waterbodies

 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.

No

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

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

N/A

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

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

Benchmark Parameter	Selected BMP	Contribution to achieving Benchmark
N/A	N/A	N/A

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

Description of bacteria-focused BMP	Comments/Discussion
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.

Benchmark Indicator	Description/Comments		
N/A	N/A		

E. Stormwater Activities

Describe activities planned for the next reporting year:

MCM(s)	ВМР	Stormwater Activity	Description/Comments	
1	All	All	Continue BMPs, update BMPs, or remove and replace BMPs as appropriate to meet updated 2020 permit requirements.	
2	All	All	Continue BMPs, update BMPs, or remove and replace BMPs as appropriate to meet updated 2020 permit requirements.	
3	All	All	Continue BMPs, update BMPs, or remove and replace BMPs as appropriate to meet updated 2020 permit requirements.	
4	All	All	Continue BMPs, update BMPs, or remove and replace BMPs as appropriate to meet updated 2020 permit requirements.	
5	All	All	Continue BMPs, update BMPs, or remove and replace BMPs as appropriate to meet updated 2020 permit requirements.	

F. SWMP Modifications

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

___X__Yes___No

- 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 X No
- If "Yes," report on changes made to measurable goals and BMPs:

MCM(s)	Measurable Goal(s) or BMP(s)	Implemented or Proposed Changes (Submit NOC as needed)
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.

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

H. Additional Information

- 1. Is the permittee relying on another entity to satisfy any permit obligations?
 - ____ Yes _**X**__ No

If "Yes," provide the name(s) of other entities and an explanation of their responsibilities (add more spaces or pages if needed).

Name and Explanation: N/A

2.a. Is the permittee part of a group sharing a SWMP with other entities?

____ Yes _**X**__ No

2.b. If "yes," is this a system-wide annual report including information for all permittees?

____ Yes _X__ No

If "Yes," list all associated authorization numbers, permittee names, and SWMP responsibilities of each member (add additional spaces or pages if needed): **N/A**

Authorization Number: _____ Permittee: _____

I. Construction Activities

1. The number of construction activities that occurred in the jurisdictional area of the MS4 (Large and Small Site Notices submitted by construction site operators):

645

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

____ Yes _**X**__ No

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

The number of municipal construction activities authorized under this general permit	
The total number of acres disturbed for municipal construction projects	N/A

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): <u>Kevin Sawtelle</u>	Title:_	City En	gineer
Signature:		Date:	3/30/21
Name of MS4: <u>City of Bee Cave</u>			
Name (printed):	_ Title:		
Signature:	Date:		
Name of MS4			
Name (printed):			
Signature:	Date:		
Name of MS4			
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.