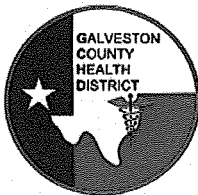


GALVESTON COUNTY HEALTH DISTRICT

Protecting and Promoting the Optimal Health and Well-Being of Galveston County

Ben G. Raimer, MD
Chair, United Board of Health

Philip Keiser, MD
Local Health Authority



Kathy Barroso, CPA
Chief Executive Officer

December 10, 2020

TCEQ Water Quality Division
Stormwater Team Leader (MC-148)
P.O. Box 13087
Austin, Texas 78711-3087

Re: Phase II MS4 Annual Report Transmittal for Galveston County
TPDES Authorization: TXR040364

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 TXR040364 for Galveston County.

The annual report is for Year 2. The reporting period's beginning 10/1/2019 and ending 9/30/2020.

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

As required by the general permit, a copy of the report has been mailed to the TCEQ's regional office (713-767-3500) in Houston, Texas.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read 'Ron Schultz', is written over a horizontal line.

Ron Schultz
Director of Environmental Health
Galveston County Health District

xc. TCEQ Houston Region, Storm Water Program, 5425 Polk Ave., Ste. H, Houston, TX 77023-1452
The Honorable Mark Henry, Galveston County Judge, 722 Moody, 2nd Floor, Galveston,
Texas 77550
Kathy Barroso, CPA, CFO, CEO, 9850-D Emmitt F Lowry Expwy, Texas
City, Texas 77591

/Permit No.: **STW / TXR040364/ RP**

Phase II (Small) MS4 Annual Report Form

TPDES General Permit No. TXR040000

A. General Information

1. Authorization Number: TXR040364

Annual Reporting Year: 10/1/2019 – 9/30/2020 (Fiscal Year [last day 9/30], Year 2)

MS4 Operator Level: Level 2 Name of MS4 / Permittee: Galveston County

Contact Name: Ron Schultz Telephone Number: 409-938-2314

Mailing Address: PO Box 939, La Marque, Texas 77568

E-mail Address: rschultz@gchd.org

A copy of the report was submitted to the TCEQ Region: Yes X No

Region the annual report was submitted to: TCEQ Region 12

B. Status of Compliance with the MS4 GP and SWMP

1. Provide information on the status of complying with permit conditions:

	Yes	No	Explain
Permittee is currently in compliance with the SWMP as submitted to and approved by the TCEQ.	X		
Permittee is currently in compliance with recordkeeping and reporting requirements.	X		

Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.)	X		
Permittee conducted an annual review of its SWMP in conjunction with preparation of the annual report	X		

2. Provide a general assessment of the appropriateness of the selected BMPs:

Table 1 – BMP Status

MCM	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
1: Public Education, Outreach, and Involvement	Health District Website's Water Pollution Page	Yes, educating the citizens spreads awareness and will eventually reduce pollutants. Over 4000 people visited the website's water pollution page.
1: Public Education, Outreach, and Involvement	Storm Water Brochure	Yes, educating the citizens spreads awareness and will eventually reduce pollutants. 50 brochures were distributed at government buildings.
1: Public Education, Outreach, and Involvement	Event Participation	Yes, educating the citizens spreads awareness and will eventually reduce pollutants, however COVID-19 cancelled all events and presentations that GCHD would normally attend and give in 2020.
1: Public Education, Outreach, and Involvement	Law Enforcement Anti-Littering Brochure	Yes, educating the citizens spreads awareness and will eventually reduce pollutants. Over 10 brochures were distributed to government buildings or violators.
1: Public Education, Outreach, and Involvement	Targeted Commercial Brochures	Yes, educating the citizens spreads awareness and will eventually reduce pollutants. Over 10 brochures were distributed to government buildings or violators.

1: Public Education, Outreach, and Involvement	Public Speaking Engagements	Yes, educating the citizens spreads awareness and will eventually reduce pollutants. COVID-19 cancelled all events and presentations that GCHD would normally attend and give in 2020, but 2 presentations were still held at the end of 2019.
1: Public Education, Outreach, and Involvement	Public Service Announcements and Press Releases	No. Though this BMP does not result in a direct reduction of pollutants, the GCHD does advertise announcements. Announcements were made on the GCHD website, in the newsletters, and the GCHD brochures. The GCHD redesigned their website and the MS4 has their own landing page with information.
1: Public Education, Outreach, and Involvement	Classroom Education	Yes, educating the citizens spreads awareness and will eventually reduce pollutants. COVID-19 cancelled all events and presentations that GCHD would normally attend and give, however in November, the Enviroscope presentation was shown to 360 citizens.
1: Public Education, Outreach, and Involvement	Storm Water Inlet Marking	Yes, educating the citizens spreads awareness and will eventually reduce pollutants. All inlet markers were checked on and reapplied as needed. 52 markers were added in Baciff.
1: Public Education, Outreach, and Involvement	Citizen Complaint/Illegal Dumping Hotline	Yes, when pollution violations are reported, immediate action can be taken to remedy the violation with the responsible party. This hotline is maintained 24 hours a day. 69 complaints were made, indicating people are aware of pollution violations and how to report them.
1: Public Education, Outreach, and Involvement	Legal Public Notice	No, this BMP does not reduce the discharge of pollutants, but it notifies the public that GCHD has renewed the MS4 General Permit and will continue to complete all BMPs. The GCHD has not received public notice instructions as of writing this report. This will be added in Year 3 if able.
1: Public Education, Outreach, and Involvement	Galveston County Environmental Coalition	Yes, meeting with other Galveston County city officials and government entities ensures teamwork for tackling pollution issues and meeting permit requirements. GCHD attended multiple meetings tackling county issues and forming action plans.

1: Public Education, Outreach, and Involvement	Newsletter 'Pulse' (via Email)	Yes, educating the citizens spreads awareness and will eventually reduce pollutants. The newsletter is sent to more than 1000 people and is available on the GCHD website, reaching even more people.
2: Illicit Discharge Detection and Elimination	Storm Sewer Map	No. This BMP does not result in a direct reduction of pollutants, but the cities within Galveston County keep updated maps available for GCHD to use for complaints, grease trap inspections, and storm water sampling.
2: Illicit Discharge Detection and Elimination	Storm Water Pollution Prevention Regulatory Instrument-Illicit Discharge	Yes, when illicit discharges are observed, immediate action can be taken to remove the pollutant and track the source using this Order.
2: Illicit Discharge Detection and Elimination	Pollutants of Concern: Bacteria	Yes, when illicit discharges are observed, immediate action can be taken to remove the pollutant and track the source. This is achievable through dry weather outfall screening & backtracking, responding to complaints, and inspecting facilities, construction sites, and the wildlife park. The sampling conducted around the wildlife park decreased from 100% bacterial exceedance in FY 2019 to 33% in FY 2020.
2: Illicit Discharge Detection and Elimination	Texas Integrated Report Index 303(d) list	No. This BMP does not result in a direct reduction of pollutants, but GCHD will use this information in ensuring the current BMPs are fitting or if more need to be added to monitor the new or updated impaired water bodies.
2: Illicit Discharge Detection and Elimination	On-Site Sewage Facility (OSSF)	Yes, when illicit discharges are observed, immediate action can be taken to remove the pollutant and track the source. GCHD also tracks 5835 maintenance contracts on high tech spray OSSF systems. 401 OSSF applications were received and 62 complaints were investigated.
2: Illicit Discharge Detection and Elimination	Employee Training	Yes, educating the employees spreads awareness and will eventually reduce pollutants. 9 employees were trained at GCHD.

3: Construction Site Storm Water Runoff Control	Plan Review and Approval Procedure	Yes, educating the project managers/contractors spreads awareness and the approval procedure ensures BMPs will be implemented on site. 1 plan was reviewed and approved.
3: Construction Site Storm Water Runoff Control	Construction Site Brochures	Yes, educating the citizens spreads awareness and will eventually reduce pollutants. 10 brochures were placed at government buildings and 1 was handed out at the construction site inspection.
3: Construction Site Storm Water Runoff Control	Storm Water Pollution Prevention Regulatory Instrument- Site Inspection and Enforcement for Erosion and Sediment Control and On-Site Waste Control	Yes, by inspecting the contractor owned construction sites, we can evaluate if proper BMPs are in place to reduce sediment discharge and erosion. 1 new construction site was inspected.
3: Construction Site Storm Water Runoff Control	Contractor Certification and Training & City Contractor Training	Yes, the reduction in pollutants will be reduced over time as the awareness spreads. 1 contractor was trained and approved for construction activity.
4: Post-Construction Storm Water Management in New Development and Redevelopment	Plan Review & Approval Procedure	Yes, the reduction in pollutants will be reduced over time as the permanent post construction BMPs are utilized. 1 post-construction plan was reviewed and approved.
4: Post-Construction Storm Water Management in New Development and Redevelopment	Storm Water Pollution Prevention Enforcement Tool & Regulatory Instrument- Inspections of Post-Construction Runoff Controls for Long Term O & M Provisions	Yes, by inspecting post construction projects, we can evaluate if proper BMPs are in place to reduce and eliminate potential discharge of pollutants. 1 post-construction site was inspected.
5: Pollution Prevention and Good Housekeeping for County Operations	County Operation Survey	Yes, by inspecting the county facilities, we can evaluate if proper BMPs are in place to reduce and eliminate potential discharge of pollutants. 3 county facilities were inspected.

5: Pollution Prevention and Good Housekeeping for County Operations	Spill Response Kits	Yes, when a spill occurs, immediate action can be taken to contain and remove a spill. All 3 county facilities had at least 1 spill response kit on site.
5: Pollution Prevention and Good Housekeeping for County Operations	Employee Training	Yes, educating the employees spreads awareness and will eventually reduce pollutants. Over 50 county staff were trained in storm water prevention and how to report violations. 9 GCHD staff were presented the Storm Watch video as part of the annual training.

3. Describe progress towards achieving the goal of reducing the discharge of pollutants to the maximum extent practicable (MEP).

Table 2 – Pollutant Reduction Analysis

MCM	BMP	Information Used	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants?
1	1.10 Citizen Complaint/Illegal Dumping Hotline	Reports via phone, email, or in person	Over 50	Complaints	Yes. When illicit discharges are observed and reported, immediate action can be taken to remove the pollutant and track the source for remediation. Complaints indicate citizens are able to recognize pollutants and report them.
2	2.4 OSSF Permitting, Inspection, and Complaint Investigation	Investigations	Over 20	Investigations	Yes. When illicit discharges are observed, immediate action can be taken to remove the pollutant and track the source for remediation.

MCM	BMP	Information Used	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants?
3	3.3 Construction Site Inspections	Site Inspection (as able)	1	Inspection	Yes. By inspecting the contractor-owned construction sites, we can evaluate if proper BMPs are in place to reduce sediment discharge and erosion.
4	4.2 Post Construction Inspection	Site Inspection	1	Inspection	No. The pollutants will be reduced over time as the permanent post-construction BMPs are utilized.
5	5.1 County Operations Survey	Facility Audits	3	County Facilities	Yes. By inspecting the county facilities, we can evaluate if proper BMPs are in place to reduce and eliminate potential discharge of pollutants, and equip the staff with the tools for recognizing, reporting, or remediating pollution.

4. Provide an assessment of the appropriateness of the implementation of the measurable goals of each MCM and an evaluation of the success of the implementation, including any obstacles or challenges.

Table 3 – Measurable Goals Status

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved.
1	Attend events and reach over 300 attendants and show at least 20 participants the Enviroscope watershed model.	Goal Met: 360 students were shown the Enviroscope model in November 2019. COVID-19 cancelled all events and presentations that were planned for 2020.
1	Respond to at least 50 complaints per year.	Goal Exceeded: Responded to 69 complaints.

2	Inspect over 20 OSSFs and respond to over 30 OSSF complaints.	Goal Exceeded: Received 401 OSSF applications and responded to 62 complaints.
3	Perform site inspections at all active construction sites.	Goal Met: Inspected 1 of 1 active construction site.
4	Inspect at least 1 post-construction project site as able.	Goal Met: Inspected 1 of 1 post-construction site.
5	Audit 3 county facilities and train at least 40 employees.	Goal Met: Audited 3 county facilities and trained 50 employees.

C. Storm Water 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.?

The Galveston County Water Pollution Control and Abatement Program of the Galveston County Health District has monitored local waterways in Galveston County since 1972. Today, we contract with nine (9) of the local city jurisdictions and with the County of Galveston to conduct ambient water monitoring. The highly trained staff of water investigators routinely collects water samples around the county. These samples are tested at the Eastex Environmental Laboratory, a NELAC certified lab. The results of those samples are compiled and reviewed by staff to determine if any additional sampling and source tracking activities are necessary. In addition, these test results compiled from our ambient water testing are included in a comprehensive annual report that is submitted to our

contracted cities and our public health partners. These documents are maintained in GCHD files. Results from the bacteria samples are compared to the State of Texas Surface Water Quality Standards. The primary contact recreation standard for *E.coli* single grab samples is 394 MPN/100-mL and the standard for *Enterococci* is 104 MPN/100-mL. When bacteria levels exceed the standard, other parameter results are evaluated, such as Dissolved Oxygen, pH, Biological Oxygen Demand, rainfall, and ammonia, to determine if those parameters are also elevated.

From October 2019 to September 2020, bacteria levels at the 8 sites were sampled in the jurisdictional area of the SWMP (Galveston County, unincorporated). These sites exceeded the standard for single grab samples in contact recreational systems 33% of the time in FY 2020. In comparison, samples exceeded 20% during FY 2019, 36% during FY 2018, and 10% during FY 2017. Many of these exceedances occurred within three days of a rainfall event.

GCHD also contracts with the following cities: Dickinson, Friendswood, Hitchcock, Jamaica Beach, La Marque, League City, Municipal Utility District #12 in Bayou Vista, Santa Fe, and Texas City. Under this contract, GCHD monitors storm water and ambient water quality. From October 2019 to September 2020 bacteria levels at the 79 sites were sampled. Bacteria levels at these sites exceeded the standard for single grab samples in contact recreational systems 40% of the time in FY 2020. Compared to samples at the 74 total sites that exceeded 40% of the time during FY 2019, 83 total sites that exceeded 35% of the time during FY 2018, and 92 total sites that exceeded 30% of the time during FY 2017. Many of these exceedances occurred within three days of a rainfall event.

As part of the implementation of the approved BMPs, GCHD re-evaluated water quality sampling sites in permit year two to help identify pollution sources and to reduce the discharge of pollutants to the MEP. Pollution in terms of bacterial contamination in the unincorporated areas of the county increased from 20% in FY 2019 to 33% in FY 2020. County-wide (including contract sampling within cities) bacterial contamination has remained the same at 40% from FY 2019 to FY 2020 while adding five additional sites. Any site with both Ammonia and Bacteria levels exceeding the

standard is sampled until the source is detected and remediated unless it is found to be an isolated dumping incident. GCHD performed one backtracking event in La Marque at the same site that was reported last year, with results indicating normal conditions. Two backtracking events in Texas City were performed at the same site this year. The first event in November resulted in a second backtracking event. No point-source pollution was found after the second backtracking and the results came back as normal conditions. The second event in July gave results indicating normal conditions.

D. Impaired Waterbodies and Total Maximum Daily Loads

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

A search of the 2020 EPA-approved 303(d) list shows zero (0) newly identified impaired waters in the Galveston County urbanized areas.

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.

GCHD utilizes storm water sampling and backtracking to monitor the pollutant of concern, bacteria. The exceedance percentage stayed the same for contracted cities and increased 13% in Unincorporated Galveston County. GCHD also utilizes public education, responds to citizen complaints, and inspects OSSFs and WWTPs to address and reduce the discharge to impaired waterbodies.

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

Implemented targeted controls include inspection of on-site sewage facilities and wastewater treatment plants, investigation of sewage and OSSF complaints, storm water sampling for bacteria impairment, and public education, especially for pet waste and other bacteria sources. GCHD is a part of the Boater Waste Workgroup, Galveston Bay

Coalition of Watersheds Workgroup, Nonpoint Source Pollution Workgroup, and others, to focus efforts on reducing bacteria in impaired waters.

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

Benchmark Parameter (Ex: Total Suspended Solids)	Benchmark Value	Description of additional sampling or other assessment activities	Year(s) conducted
<i>Bacteria</i>	50 Citizen complaints	Inspected and remediated 69 complaints; decreased reporting of 9 from the previous year.	Annually
<i>Bacteria</i>	Reach 300 public event attendants	Presented the Enviroscope watershed model to 360 attendants. Raised awareness by distributing over 50 brochures to governmental buildings or citizens. Events in 2020 were cancelled due to COVID-19.	Annually
<i>Bacteria</i>	8 Galveston County Sample Sites	Monitored and sampled 8 sites, 6 times per year.	Annually
<i>Bacteria</i>	11 Wastewater Treatment Plant Inspections	Inspected and conducted sampling at 11 facilities; helping facilities stay under permit limits.	Annually

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
<i>Bacteria</i>	Storm Water Sampling	The exceedance percentage neither increased nor decreased for contracted cities and increased 13% in Unincorporated Galveston County.
<i>Bacteria</i>	Citizen Complaints	Complaints were down by 9 since FY2019; all 69 complaints were investigated and resolved or are still in progress.
<i>Bacteria</i>	On-Site Sewage Facilities (OSSFs)	Over 62 complaints were investigated & resolved.

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

Description of bacteria-focused BMP	Comments/Discussion
On-site Sewage Facilities	Inspections of OSSFs & maintenance contracts.
Illicit Discharges	Complaints, grease trap inspections, construction site inspections, WWTP sampling, and storm water sampling; backtracking when required.
Animal Sources	Complaints, storm water sampling, and inspection of Bayou Wildlife Park.

Residential Education	Public education events, brochure handouts, presentation of the Watershed Enviroscope.
Wastewater Treatment Plants	Inspections and sampling; helping facilities stay under permit limits.

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

Benchmark Indicator	Description/Comments
Number of citizen reports generated and investigated	69 reports were generated and investigated, 9 fewer than in FY 2019.
Number of citizens educated	Over 360 citizens through presentations, the newsletter, GCHD website, brochures, or other means.
Number of County and GCHD staff trained	59 County and GCHD staff trained.
Decrease in number of OSSF overflows reported	The number of reports decreased from 67 to 62.

E. Storm Water Activities Next Reporting Year

All storm water activities reported in Table 1 – BMP Status will be continued in the next reporting year.

F. SWMP Modifications and Additional Information

1. The SWMP and MCM implementation procedures are reviewed each year. ☒ Yes ☐ No
2. Changes have been made or are proposed to the SWMP since the NOI or the last annual report, including changes in response to TCEQ's review. ☐ Yes ☒ No

G. Additional BMPs for TMDLs and I-Plans

No additional BMPs were found to be necessary at this time.

H. Additional Information

1. Is the permittee relying on another entity to satisfy any permit obligations? ☒ Yes ☐ No

If Yes, provide the name(s) of other entity/ies and an explanation of their responsibilities (add more spaces or pages if needed):

Name and Explanation: Galveston County contracts the GCHD to conduct MS4 work in the unincorporated urbanized areas of Galveston County. Galveston County and the GCHD will be utilized interchangeably in the report.

- 2.a. Is the named permittee sharing a SWMP with other entities? ☐ Yes ☒ No
- 2.b. If 'yes,' is this a system-wide annual report including information for all permittees? ☐ Yes ☒ No

If "Yes," list all associated permit numbers and permittee names (add additional spaces or pages if needed):

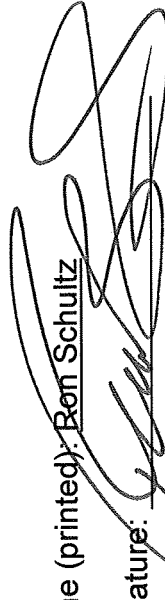
Authorization Number: N/A Permittee: N/A

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): 1 new construction activity between 0-5 acres that GCHD is aware of.
- 2.a. Does the permittee utilize the 7th MCM related to construction? Yes ☒ No

J. Certification

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): Ron Schultz
Signature: 

Title: Director of Environmental Health

Date: 12/10/2020

Name of MS4: Galveston County

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