



**PLUMMER**

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

**LETTER OF TRANSMITTAL**

DATE: December 15, 2020  
APAI PROJECT NO.: 1853-003-01  
CLIENT PROJECT NO.: N/A  
ATTENTION: Stormwater Team Leader  
REGARDING: Ferris, TX MS4 Annual Report  
DELIVERY METHOD: Overnight - Standard

We are sending you copies of the following attached items:

- ☐ Shop Drawings    ☐ Exhibits    ☐ Plans    ☐ Samples    ☐ Specifications  
☐ Copy of Letter    ☐ Change Order    ☒ Other – MS4 Annual Report



Copies	Date	No.	Description
1	12/15/2020		City of Ferris MS4 Annual Report – FY2020

These item(s) are transmitted for your records

**REMARKS:**

Here is the MS4 annual report for the City of Ferris for Fiscal Year 2020

Copy to: File

Signed:    
Dexter May, PE

*If enclosures are not as noted, kindly notify us at once.*



December 15<sup>th</sup>, 2020

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

Re: Phase II MS4 Annual Report Transmittal for the City of Ferris, Texas  
TPDES Authorization: TXR040423

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 TXR040423 for the City of Ferris, Texas.

The annual report is for Year 2. The reporting period's beginning October 1<sup>st</sup>, 2019 and ending September 30<sup>th</sup>, 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 4 in Fort Worth, Texas.

Sincerely,

Brooks Williams, Ferris City Manager

## Phase II (Small) MS4 Annual Report Form

**TPDES General Permit Number TXR040000**

### A. General Information

Authorization Number: TXR040423

Reporting Year: 2

Annual Reporting Year Option Selected by MS4:

Calendar Year: \_\_\_\_\_

Permit Year: \_\_\_\_\_

Fiscal Year: \_\_\_\_x\_\_\_\_ Last day of fiscal year: (9/30/2020)

Reporting period beginning date: (month/date/year) 10/1/2019

Reporting period end date: (month/date/year) 9/30/2020

MS4 Operator Level: Level 1

Name of MS4: City of Ferris, Texas

Contact Name: Michael Hamilton

Telephone Number: (972) 544-2110

Mailing Address: 104 S. Central St., Ferris, TX 75125

E-mail Address: michaelhamilton@ferristexas.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 4, Fort Worth

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

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

	Yes	No	Explain
Permittee is currently in compliance with the SWMP as submitted to and approved by the TCEQ.	X		The majority of FY2020 tasks have been completed.
Permittee is currently in compliance with recordkeeping and reporting requirements.	X		Records are kept at Public Works Facility at 409 S. Main St.

Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.).	<b>X</b>	No TMDL or other requirements apply.
Permittee conducted an annual review of its SWMP in conjunction with preparation of the annual report	<b>X</b>	Annual review conducted on 12/13/2019 and 12/3/2020

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

<b>MCM(s)</b>	<b>BMP</b>	<b>BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)</b>
See Attachment Part B.2.		

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

<b>MCM</b>	<b>BMP</b>	<b>Information Used</b>	<b>Quantity</b>	<b>Units</b>	<b>Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)</b>
See Attachment Part B.3.					

4. Provide the measurable goals for each of the MCMs, and an evaluation of the success of the implementation of the measurable goals (**see Example 3 in instructions**):

<b>MCM(s)</b>	<b>Measurable Goal(s)</b>	<b>Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.</b>
See Attachment Part B.4.		

## 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.?

*Unfortunately, due to the Covid-19 pandemic, the annual Ferris Earth Day community clean up event was canceled in 2020. This annual event is the City's single most important event for reducing stormwater pollutants each year.*

*The City of Ferris developed a stormwater outfall map in FY2020 in accordance with the MS4 general permit requirements. Each outfall was visited to produce the map and photographs were taken of each outfall. During the visual inspections of outfalls, the City made a list of the outfalls that required repair. 34 outfalls were inspected this year. The outfall map has been included as Attachment C.1 of this report.*

## D. Impaired Waterbodies

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

*Not applicable. The City of Ferris, Texas does not directly discharge into any impaired water bodies.*

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

*Not applicable. The City of Ferris, Texas does not directly discharge into any impaired water bodies.*

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

*Not applicable. The City of Ferris, Texas does not directly discharge into any impaired water bodies.*

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

<b>Benchmark Parameter</b> <i>(Ex: Total Suspended Solids)</i>	<b>Benchmark Value</b>	<b>Description of additional sampling or other assessment activities</b>	<b>Year(s) conducted</b>
<i>Not applicable. The City of Ferris, Texas does not directly discharge into any impaired water bodies.</i>			

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

<b>Benchmark Parameter</b>	<b>Selected BMP</b>	<b>Contribution to achieving Benchmark</b>
<i>Not applicable. The City of Ferris, Texas does not directly discharge into any impaired water bodies.</i>		

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

<b>Description of bacteria-focused BMP</b>	<b>Comments/Discussion</b>
<i>Not applicable. The City of Ferris, Texas does not directly discharge into any impaired water bodies.</i>	

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

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

- number of sources identified or eliminated;
- number of illegal dumpings;
- increase in illegal dumping reported;
- number of educational opportunities conducted;
- reductions in sanitary sewer flows (SSOs); /or
- increase in illegal discharge detection through dry screening.

<b>Benchmark Indicator</b>	<b>Description/Comments</b>
<i>Not applicable. The City of Ferris, Texas does not directly discharge into any impaired water bodies.</i>	

## E. Stormwater Activities

Describe activities planned for the next reporting year:

MCM(s)	BMP	Stormwater Activity	Description/Comments
See Attachment Part E.1.			

## F. SWMP Modifications

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

☒ Yes ☐ No

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

☐ Yes ☒ No

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

MCM(s)	Measurable Goal(s) or BMP(s)	Implemented or Proposed Changes (Submit NOC as needed)
<i>Not applicable. No changes have been made or are proposed.</i>		

**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.).

*Not applicable. No changes have been made or are proposed.*

## 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.

BMP	Description	Implementation Schedule (start date, etc.)	Status/Completion Date (completed, in progress, not started)
Not applicable. No additional BMPs are necessary.			

## 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 entities and an explanation of their responsibilities (add more spaces or pages if needed).

Name and Explanation: *Not applicable.*

2.a. Is the permittee part of a group 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 ☒ N/A

If "Yes," list all associated authorization numbers, permittee names, and SWMP responsibilities of each member (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): 0

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

☐ Yes ☒ No

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

The number of municipal construction activities authorized under this general permit	
The total number of acres disturbed for municipal construction projects	<i>Not applicable.</i>

**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): Brooks Williams Title: City Manager

Signature:  Date: 12/10/2020

Name of MS4 City of Ferris, Texas

**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.

## Part B.2 - General Assessment of Appropriateness of BMPs

The following table includes selected BMPs from the City's SWMP and a discussion of their appropriateness for reducing the discharge of pollutants in stormwater.

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
1-1 General Public Education	Distribute stormwater pollution prevention information by mail and electronically.	Yes. Education makes residents aware of pollution causing activities that they may not have been previously aware of.
1-6 Public Participation Events	Co-Sponsor Ferris Earth Day each year	Yes. The annual clean-up event removes a significant amount of garbage from the community that could cause pollution. However, the event was canceled in April 2020 due to Covid-19.
3-3: Construction Site Inspections	Inspect construction sites larger than 1 acre for erosion control measures.	Yes. Inspections ensure that water, erosion, and sediment control measures are in place and that sediment is prevented from leaving the project site.
5: Pollution Prevention & Good House-keeping for Municipal Operations	Train all public works and streets staff	Yes. Annual staff training is key to pollution prevention. NCTCOG training materials will be used moving forward.

## Part B.3 - Progress Made

MCM	BMP	Information Used	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
1	1-1 General Education Program	Stormwater Document in Utility Bill	1,300	Brochures	No. Though this BMP does not result in a direct reduction of pollutants, educating the citizens will eventually reduce litter, hence pollutants.
2	2-1 Storm Sewer Map	Visual Inspections of all Outfalls	34	Outfalls	Yes. The City conducted a visual inspection of 34 stormwater outfalls. Outfalls requiring maintenance, rehabilitation, or replacement were identified for future repair.

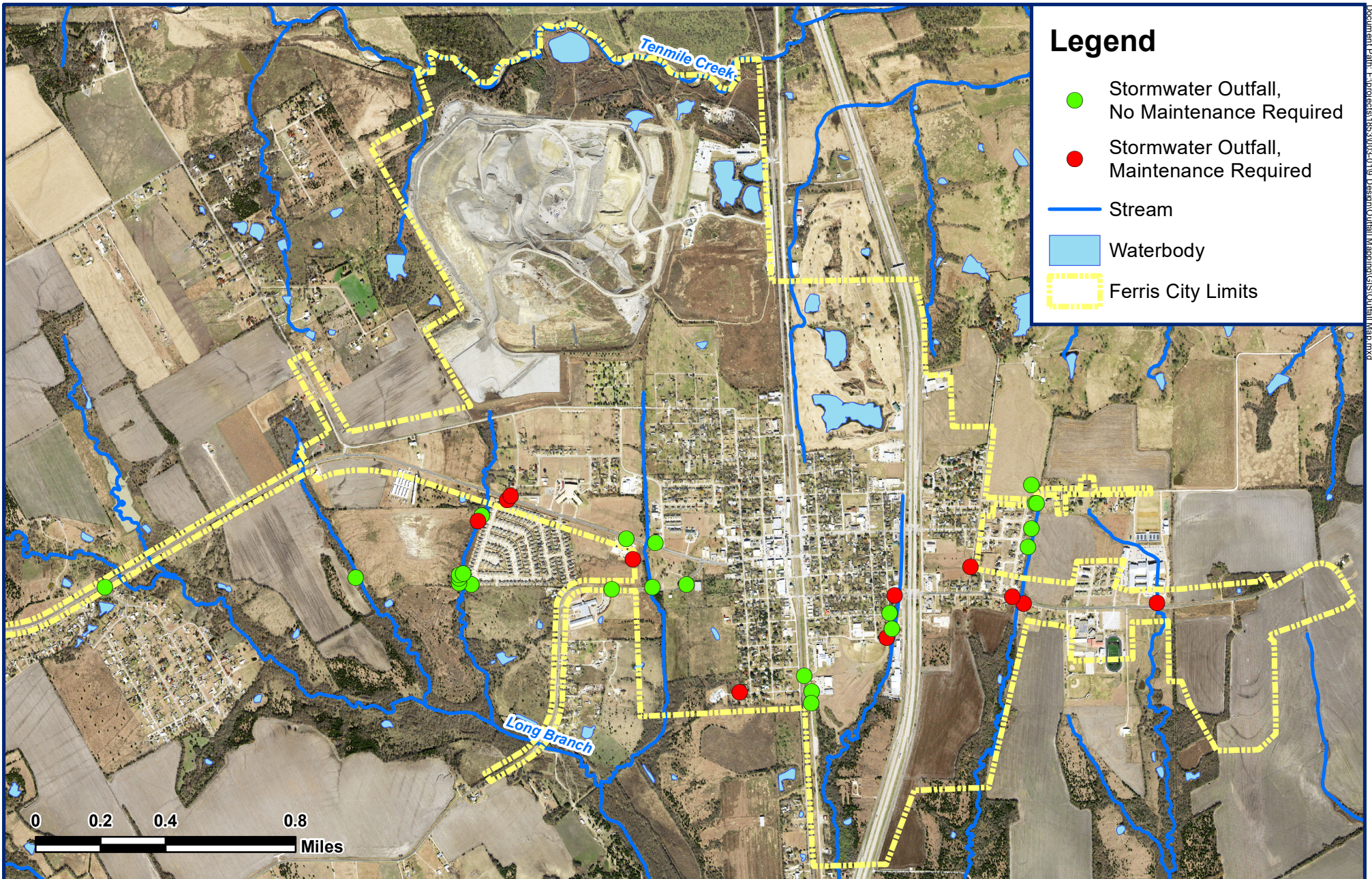
## Part B.4 - City of Ferris Stormwater Management Plan - Tasks Completed in FY 2020

Minimum Control Measure (MCM)	Permit Requirement	Best Management Practice	Tasks to be Completed by October 1st, 2020	Success
1. Public Education, Outreach and Involvement	(a)(1) Education Program for Public, Employees, and Businesses	1-1 General Education Program	Provide educational materials at City Hall and Public Participation Events at least once annually	Met goal. Stormwater pollution prevention article printed and posted in City office at 104 S. Central St
			Provide SWMP information on City Website and review and update as necessary - at least once annually	Met goal. Stormwater pollution prevention article posted on City's website. At <a href="https://www.ferristexas.gov/public-works-department/pages/reports-documents">https://www.ferristexas.gov/public-works-department/pages/reports-documents</a>
			Provide stormwater educational mailer in water bill at least once annually.	Met goal. Stormwater mailer developed and sent to approximately 1,300 addresses.
	(a)(2) Make Educational Materials Available at Least Annually	1-2 Municipal Employee Training Program	Purchase, obtain, or develop additional materials for education program.	Met goal. Training videos from NCTCOG acquired.
	(a)(3) Post SWMP and Annual Reports on City Website		Continue to provide annual training to City employees. Document the # of employees trained and type of materials used.	Did not meet goal. City did not record the number of employees trained. The City will emphasize this goal in FY2021.
	(a)(4) Review and Update SWMP and MCM Implementation Procedures Annually	1-3 Post SWMP and Annual Report on City Website	Post annual reports to City website no later than 30 days after the due date.	Met goal. The City posted the FY2019 annual report within 30 days after its due day. The City will post this FY2020 annual report by January 31st, 2021. The SWMP has not yet been approved by the TCEQ, but it will also be posted when approved.
		1-4 Review the SWMP and MCM Implementation Procedures	Annually review the SWMP and MCM implementation procedures. Update if necessary	Met goal. SWMP and MCM reviewed on 12/13/2019 and 12/3/2020.
	(b)(1) Public Input in Stormwater Program	1-5 General Permit Public Notice	Provide public notice for SWMP per TCEQ direction.	Met goal. The TCEQ is still reviewing the SWMP, but the City will provide public notice when prompted by the TCEQ.
2. Illicit Discharge Detection and Elimination	(b)(2) Public Involvement Opportunities	1-6 Public Participation Events	Continue the annual Ferris Earth Day event. Document the # of participants and the amount of trash removed.	Did not meet goal. The Ferris Earth Day event was canceled due to Covid-19. The next Earth Day event is tentatively planned for April 2021.
			Annually advertise the Ferris Earth Day event using the City's phone messaging system.	Did not meet goal. The Ferris Earth Day event was canceled due to Covid-19. The next Earth Day event is tentatively planned for April 2021.
	(c)(1) MS4 Map	2-1 Storm Sewer Map	Review the map annually to ensure that any new outfalls operated by the City and any other information useful to the program are included.	Met goal. Outfall map updated.
	(c)(3) Public Reporting	2-2 Public Reporting	Prepare procedures for implementing and responding to the public reporting system.	Met goal. Public reports can be submitted on the City's website by clicking on "Services" then "Report an Issue" at the top right corner of the home page.
	(c)(4) Spill Response Procedures	2-3 Spill Control and Response	Make any necessary changes and ensure that spill control procedures are fully documented.	Met goal. The City calls a local cleanup crew for spills.
3. Construction Site Stormwater Runoff Control	(c)(5) Source Investigation and Elimination	2-4 Ordinance for Illicit Discharge Detection and Elimination	Draft illicit discharge ordinance and perform legal review.	Met goal. Ordinance drafted and submitted for legal review.
	(c)(6) Inspections	2-5 Illicit Discharge Inspections	Develop and provide training to inspectors involved in illicit discharge inspections.	Did not meet goal. The City did not conduct official MS4 employee training this year. Training will be targeted for FY2021.
	(b)(2) Requirement for Erosion and Sediment Control BMPs	3-1 Ordinance for Construction Site Stormwater Runoff Control	Draft construction storm water ordinance and perform legal review.	Met goal. Ordinance drafted and submitted for legal review.
	(b)(4) Construction Plan Review Procedures	3-2 Site Plan Review Process	Develop changes to plan review process and prepare educational information.	Met goal. Plans will be reviewed for stormwater controls after ordinance is passed.
	(b)(5) Construction Site Inspections	3-3 Construction Site Inspections and Enforcement	Develop and provide training to employees involved in construction site inspections	Goal not met. Employee training will be emphasized in FY2021.
4. Post Construction Stormwater Management in New Development and Redevelopment	(a) Post-Construction Stormwater Management Program	4-1 Ordinance for Post Construction Stormwater Management	Draft post-construction storm water ordinance and perform legal review.	Met goal. Post-construction ordinance drafted and submitted for legal review.
	(b)(2) Document Enforcement	4-2 Post-Construction Inspections	Develop and provide training to employees involved in post-construction inspections.	Goal not met. Employee training will be emphasized in FY2021.
5. Pollution Prevention and Good Housekeeping for Municipal Operations	(b)(1) Permittee-owned Facilities and Control Inventory	5-1 Inventory of City Facilities	Annually review the inventory of City facilities and revise as necessary.	Met goal. Inventory reviewed and updated.
	(b)(3) Disposal of Waste Material	5-2 Waste Disposal Procedures	Develop the procedures to meet General Permit requirements for proper waste disposal. Document any changes to existing procedures.	Met goal. The City calls a local cleanup crew for spills. The City does not generate much waste from municipal activities.
	(b)(4) Contractor Requirements and Oversight	5-3 Municipal Contractor Oversight	Review standard municipal contract to determine extent of changes that may be necessary	Met goal. Contractors will be made aware of stormwater ordinances when passed.
	(b)(5) Municipal Operation and Maintenance Activities	5-4 Municipal Operation and Maintenance Activities	Identify pollutants of concern that could be discharged during maintenance.	Met goal. Activities include minor pothole repair and local pesticide usage. The City contracts out lawn mowing and pavement marking.
	(b)(6) Structural Control Maintenance	5-5 Structural Control Maintenance	Develop or obtain standard maintenance practices for structural controls as they are developed. Implement maintenance on city-owned structural controls. Document the locations and types of controls included in the program.	Met goal. Outfalls and other structural controls (culverts) were inspected and a list of structures requiring maintenance was created.

**Table E.1 - City of Ferris Stormwater Management Plan - Planned FY 2021 Task List**

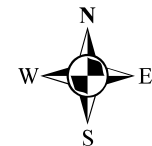
Minimum Control Measure (MCM)	Permit Requirement	Best Management Practice	2021 Task
1. Public Education, Outreach and Involvement	(a)(1) Education Program for Public, Employees, and Businesses	1-1 General Education Program	Provide educational materials at City Hall and Public Participation Events at least once annually Provide SWMP information on City Website and review and update as necessary - at least once annually Provide stormwater educational mailer in water bill at least once annually.
	(a)(2) Make Educational Materials Available at Least Annually	1-2 Municipal Employee Training Program	Continue to provide annual training to City employees. Document the # of employees trained and type of materials used.
	(a)(3) Post SWMP and Annual Reports on City Website	1-3 Post SWMP and Annual Report on City Website	Post annual reports to City website no later than 30 days after the due date.
	(a)(4) Review and Update SWMP and MCM Implementation Procedures Annually	1-4 Review the SWMP and MCM Implementation Procedures	Annually review the SWMP and MCM implementation procedures. Update if necessary
	(b)(1) Public Input in Stormwater Program	1-5 General Permit Public Notice	Provide public notice for SWMP per TCEQ direction.
	(b)(2) Public Involvement Opportunities	1-6 Public Participation Events	Continue the annual Ferris Earth Day event. Document the # of participants and the amount of trash removed.
			Annually advertise the Ferris Earth Day event using the City's phone messaging system.
2. Illicit Discharge Detection and Elimination	(c)(1) MS4 Map	2-1 Storm Sewer Map	Review the map annually to ensure that any new outfalls operated by the City and any other information useful to the program are included.
	(c)(3) Public Reporting	2-2 Public Reporting	Implement public reporting method(s). Publicize the opportunity for the public to report at least once per year. Document the number of complaints received and follow-up actions.
	(c)(4) Spill Response Procedures	2-3 Spill Control and Response	Review spill control procedures annually and make any necessary revisions in light of any leaks or spills that have occurred during the fiscal year.
	(c)(5) Source Investigation and Elimination	2-4 Ordinance for Illicit Discharge Detection and Elimination	Pass ordinance by September 30th, 2021.
	(c)(6) Inspections	2-5 Illicit Discharge Inspections	Perform inspections after becoming aware of an illicit discharge. Document number of inspections performed, identified sources of illicit discharges, and corrective actions taken.
3. Construction Site Stormwater Runoff Control	(b)(2) Requirement for Erosion and Sediment Control BMPs	3-1 Ordinance for Construction Site Stormwater Runoff Control	Pass ordinance by September 30th, 2021.
	(b)(4) Construction Plan Review Procedures	3-2 Site Plan Review Process	Implement changes to site plan review and permit process. Document number of site plans reviewed for compliance with new procedures.
	(b)(5) Construction Site Inspections	3-3 Construction Site Inspections and Enforcement	Perform inspections of the new construction site requirements. Document number of inspections performed, and corrective actions taken.
4. Post Construction Stormwater Management in New Development and Redevelopment	(a) Post-Construction Stormwater Management Program	4-1 Ordinance for Post Construction Stormwater Management	Pass ordinance by September 30th, 2021.
	(b)(2) Document Enforcement	4-2 Post-Construction Inspections	Perform inspections of the new post-construction site requirements. Document number of inspections performed, and corrective actions taken.
5. Pollution Prevention and Good Housekeeping for Municipal Operations	(b)(1) Permittee-owned Facilities and Control Inventory	5-1 Inventory of City Facilities	Annually review the inventory of City facilities and revise as necessary.
	(b)(3) Disposal of Waste Material	5-2 Waste Disposal Procedures	Implement new waste disposal procedures. Annually document amount of waste disposed.
	(b)(4) Contractor Requirements and Oversight	5-3 Municipal Contractor Oversight	Develop changes to municipal contracts to include pollution prevention procedures developed in BMP 5-1 as necessary.
	(b)(5) Municipal Operation and Maintenance Activities	5-4 Municipal Operation and Maintenance Activities	Develop and implement pollution prevention measures that will reduce the discharge of pollutants in stormwater during the maintenance activities. Annually document activity performed.
	(b)(6) Structural Control Maintenance	5-5 Structural Control Maintenance	Develop or obtain standard maintenance practices for structural controls as they are developed. Implement maintenance on city-owned structural controls. Document the locations and types of controls included in the program.





**FERRIS  
TEXAS**

**APPENDIX C.1  
STORMWATER OUTFALL LOCATIONS  
CITY OF FERRIS  
ELLIS COUNTY, TEXAS**



DATE: 12/15/2020



**PLUMMER**  
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