Storm Water E-Assessment

Monitoring Program

Module 10

[To Be Completed by EPA]

Name of the Permittee: City of San Antonio, San Antonio Water System, Texas Department of Transportation	MS4 Permit Number: WQ0004284000 / EPA ID TXS001901
Assessment Period: 2014	
Reviewed by:	Date Reviewed:

Permittee Instructions: Please complete the worksheet below. Please note that upon opening this Module, some content may be disabled such as the capacity to check inside the "boxes." The content can usually be activated by pressing "Enable Content" which will appear below the Toolbar in "MS Office."

ATTACHMENTS REQUESTED	Document attached
1. Attach an organizational chart.	☑ YES ☐ NO

MONITORING	
Control Measure that must include pollution prevention measures, treatment or removal techniques or, monitoring, use of legal authority, and other appropriate means to control the quality of storm water discharged from the MS4 to the Maximum Extent Practicable *(MEP).* The Monitoring and Screening program may include a Dry Weather Screening program, Wet Weather Screening program and Industrial and High Risk Runoff Monitoring program.	
1. In accordance with 40 CFR§122.26 [Phase I] has the permittee developed a *Storm Water Management Program (SWMP),* that describes how the **Monitoring** program will be implemented?	☑ YES ☐ NO
2. What pollutants of concern are targeted for reduction through the implementation of the **Monitoring** program?	
Response: All parameters listed in the MS4 permit are sampled at outfalls 001 – 008. Outfall 007 is the responsibility of TXDOT. SAWS samples 001-006 and 008. Targeted bacteria and ammonia sampling is done also under the dry weather screening in the IDDE program.	
ORGANIZATIONAL STRUCTURE	
1. Is there a storm water team in place to ensure that the **Monitoring** program is properly implemented?	☑ YES ☐ NO
2. Describe the organizational structure and staff responsibilities to implement the **Monitoring** program. Include the name, title, contact information, department name and key responsibilities of each team member.	

Response: Within SAWS RPC Department there are several types of monitoring including: Storm Water stations, Wet weather monitoring, Dry weather monitoring and Industrial monitoring. Dry weather field screening information is included in the IDDE section. The SW station monitoring for outfalls 001 - 006 and 008 are monitored by RPC staff With 007 being contracted out by TxDOT. Within the RPC there is a 24 hour response group that rotates the responsibility to ensure that the sampling stations are maintained and sampled appropriately. During each rotation there is a team lead that is responsible for getting an alert on their phone when storm water stations start sampling during a rain event. They contact additional staff member and they coordinate to both respond to the stations to pick up samples. The grab samples are collected first and the stations checked for proper flow proportionate collection for the event. Another sweep is then conducted to pick up the flow proportional samples as the storm event ends. Depending on time of day or night the Team Lead will contact lab personnel and alert them to samples coming into the lab (if after hours). There is also a collection of grab samples taken for the wet weather monitoring program from various locations with the samples coming directly from stream segments. This differs from the station sampling in that the stations are outfalls from the MS4 that are sampled. The group samples the stations and the stream locations in accordance with the sampling plan in the SWMP. Industrial sampling occurs on a case by case basis when needed. Generally the self-monitoring data is reviewed during the Industrial MSGP inspections. Staff coordinates and performs sampling under the direction of Martin Miller, Industrial Compliance Supervisor.	
3. What co-permittee(s) and or interagency departments will participate in the implementation of the **Monitoring** program?	
Response: SAWS RPC	
4. Describe any formal agreements and key areas of responsibility shared by the permittee, co-permittee(s) and or interagency departments in the implementation of the **Monitoring** program.	
Response: There is an interlocal agreement with the COSA that places the collection of samples and the reporting responsibility with SAWS.	
5. Do program participants *(e.g., permittee, co-permittee (s), other departments)* meet regularly to discuss the progress of the **Monitoring** program?	☑ YES ☐ NO
6. Describe the frequency of these meetings.	
Response: An annual budget meeting is held with the COSA and SAWS to discuss budget, positions and the overall program. There are other meetings held to discuss items as needed. Things such as changes to the SWMP, responsibilities, permit changes, annual reports and individual issues may cause additional meetings to coordinate as needed.	
LEGAL AUTHORITY	
1. Does the permittee have legal authority to implement the **Monitoring** program?	☑ YES ☐ NO
2. What ordinances, codes, or policies provide this legal authority?	
Response: There is no legal authority necessary to collect samples from the SW stations or the wet weather monitoring program. Samples are collected from easements owned by the permittees. For Industrial monitoring there is a provision in Chapter 34-753 that requires compliance with the TCEQ's MSGP requirements including sampling for Benchmark, Hazardous metals and any sector specific sampling that is required under the MSGP.	
3. Who *(e.g., specific staff, department, etc.)* has the authority to enforce this legal authority?	
Response: SAWS RPC	
4. Is the **Monitoring** program standard conditions *(i.e., **40 CFR§ Part 136 provisions**)* included in the permittee's SWMP?	☑ YES ☐ NO

FISCAL RESOURCES		
1. What is the budget for the implementation **Monitoring** program?	REPORTING PERIOD 2014	NEXT REPORTING PERIOD
	Response: $229,235	Response: $226,455

SECTION I: MEASURABLE GOALS	
1. What are the Measurable Goals for the **Monitoring** program? Include expected quantifiable results.	
Measurable Goal 1	**Monitor all permitted outfalls for qualified storm events.**
Expected Quantifiable Results	**The collection of all sample parameters in adequate quantities to run all requires tests.**
Measurable Goal 2	**Collect from three events per quarter from each station.**
Expected Quantifiable Results	**Correct calibration and maintenance of equipment to ensure proper collection.**
Measurable Goal 3	**Enter data into the EDMR system on TCEQ web site**
Expected Quantifiable Results	**Done each quarter, with all sample results entered prior to the annual report due date to the COSA.**
Measurable Goal 4	
Expected Quantifiable Results	
2. Are these Measurable Goals described in the SWMP?	☑ YES ☐ NO

SECTION II: TRAINING/EDUCATION	
STAFF	
1. Does the permittee require staff to complete special, continuous, and or annual training or obtain certification or licensing to implement and manage the **Monitoring** program?	☑ YES ☐ NO
2. If yes, describe the applicable training, certification or licensing and the required frequency for each.	
Response: The EPS 2 and 3 positions both require training for both Pretreatment and Storm Water programs; most of the EPS3 staff has obtained a REM or is in process. In addition, they maintain a TCEQ license for Collection Systems and others for Wastewater Operations. Training is also done in house at weekly staff meetings. Items include permit requirements and sampling guidelines are also reviewed.	
3. What kind of information such as brochures or guidance is used by staff for education and training?	
Response: Supervisors use webinars, workshops and TCEQ guidance documents for training.	
4. Is there a system in place to notify staff when required training is due, and does it document the training completion dates?	☑ YES ☐ NO

SECTION III: WATER QUALITY MANAGEMENT	
1. Does the permittee document pollutant loadings and / or trends in pollutant loadings for specific watershed to outfalls?	☐ YES ☑ NO
2. Has permittee identified major surface waters within its jurisdiction?	☑ YES ☐ NO
3. Has permittee identified all major outfalls that discharge into surface waters within its jurisdiction?	☑ YES ☐ NO
4. Has permittee identified the location of all its monitoring and sampling stations?	☑ YES ☐ NO

SECTION IV: MONITORING APPROACHES

WATER QUALITY MONITORING

1. What types of water quality monitoring approaches are used? *(Check all that apply):*	▪**Visual Observations**	☑ YES ☐ NO
	▪**Best Management Practices *(BMPs)* Performance Monitoring**	☐ YES ☑ NO
	▪**Probability Monitoring**	☐ YES ☑ NO
	▪**Short-Term Extensive Network Monitoring**	☐ YES ☑ NO
	▪**Site-Specific Monitoring**	☑ YES ☐ NO
	▪**Long-Term Fixed Stations Monitoring**	☑ YES ☐ NO
	▪**Receiving Water Monitoring**	☑ YES ☐ NO

AMBIENT MONITORING

1. What types of ambient monitoring approaches are used? *(Check all that apply):*	▪**Water Column Monitoring**	☑ YES ☐ NO
	▪**Biological Monitoring**	☐ YES ☑ NO
	▪**Sediment Monitoring**	☐ YES ☑ NO

SAMPLING

1. What types of sampling does the permittee perform? *(Check all that apply):*	▪**Storm Discharge Events Samples**	☑ YES ☐ NO
	▪**Composite Samples**	☑ YES ☐ NO
	▪**Grab Samples**	☑ YES ☐ NO

DRY WEATHER MONITORING

1. Does the permittee conduct dry weather monitoring?	☑ YES ☐ NO
2. Has dry weather monitoring satisfactorily detected pollutants discharged to the MS4?	☑ YES ☐ NO

3. Describe the most significant pollutants that are detected through dry weather monitoring.

Response: Bacteria sources from unreported SSOs are sometimes located in remote locations not readily accessible to the public. Outfall monitoring has located several of these allowing for a response and repair.

4. Describe in general terms the action that the permittee takes when pollutants are detected.

Response: Identify the type of discharge and determine the location or source. Contact the responsible party and summarize the issue for the responsible party identifying the pollutant of concern. Require an action plan for remediation and issue a corrective action letter fully describing the violation and requirements for remediation. A revisit to site to review progress, finalize correction actions and verify remediation. If corrective action is not accomplished then the next steps would be enforcement.

WET WEATHER MONITORING

1. Does the permittee conduct wet weather monitoring?	☑ YES ☐ NO
2. Has wet weather monitoring satisfactorily detected pollutants discharged to the MS4?	☐ YES ☑ NO

3. Describe the most significant pollutants that are detected through wet weather monitoring.

Response: Bacteria are present in all storm events.

4. Describe in general terms the action that the permittee takes when pollutants are detected.
Response: Verification that there is not an unreported upstream SSO.

SECTION V: CLIMATIC CONDITIONS

1. Which months have the highest precipitation/ rainfall events?	MONTHS	PRECIPITATION = 1/2" OR MORE
	January 2014 (0.23)	☐ YES ☑ NO
	February 2014 (0.42)	☐ YES ☑ NO
	March 2014 (1.06)	☑ YES ☐ NO
	April 2014 (0.68)	☑ YES ☐ NO
	May 2014 (4.97)	☑ YES ☐ NO
	June 2014 (5.38)	☑ YES ☐ NO
	July 2014 (3.25)	☑ YES ☐ NO
	August 2014 (0.08)	☐ YES ☑ NO
	September 2014 (1.77)	☑ YES ☐ NO
	October 2013 (2.81)	☑ YES ☐ NO
	November 2013 (1.5)	☑ YES ☐ NO
	December 2013 (0.55)	☑ YES ☐ NO

SECTION VI: RECORDS MANAGEMENT

1. Does the permittee have a database in place to track activities of the **Monitoring** program?	☑ YES ☐ NO
2. What information is tracked in the database for the **Monitoring** program?	
Response: Sampling data is compiled for purposes of filling out the DMR information.	
3. Who has access to this database?	
Response: SAWS RPC and Lab	
4. Who is responsible for updating this database?	
Response: SAWS lab uploads the information into database from testing. SAWS RPC formats it to input into the TCEQ EDMR system.	
5. What reports are generated to show the progress of the **Monitoring** program?	
Response: An annual report is filled out showing when monitoring occurred, how many events for each quarter and what parameters were run. A series of excel spreadsheets are used to chart the individual parameters on an event basis and by date.	

SECTION VII: ASSESSMENT

1. Does the permittee assess the effectiveness of the **Monitoring** program?	☑ YES ☐ NO
2. Based on the results of the effectiveness assessment, describe the positive results of the **Monitoring** program.	
Response: Every quarter is sampled that has a rain event. If at least three sampling event are captured a quarter then there are enough data points for the loading assessment.	
3. Based on the results of the effectiveness assessment, what changes are proposed to enhance the	

Monitoring program?	
Response: Currently the effectiveness is based upon meeting the permit requirements for sampling and reporting. As the permit evolves and more comprehensive performance measurements and goals are required the SWMP will be changed and the assessment will change.	
4. Does the permittee have adequate staff and equipment to implement the **Monitoring** program?	☑ YES ☐ NO
5. Does the permittee assess the **Monitoring** program to determine if it meets Measurable Goals and other indicators?	☑ YES ☐ NO
6. Does the permittee assess the **Monitoring** program's compliance with the permit requirements?	☑ YES ☐ NO
7. Does the permittee generate an assessment report of the **Monitoring** program for its records?	☑ YES ☐ NO
8. What departments are involved in the **Monitoring** program assessment?	
Response: SAWS RPC collects the sampling data and Lab runs the analysis and puts together the report and RPC submits it to TCEQ via the EDMR system and copies the COSA for reporting purposes.	
Completed by (Print Name): Martin Miller	
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