MS4 Self-Assessment

Pesticide, Herbicide, Fertilizer Applications

Module 11

Name of the Permittee: City of San Antonio	MS4 Permit Number: WQ0004284000
Assessment Period:	

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
2. Attach a list that identifies the location of PHFs stored by the permittee. Also include photos where the PHFs are stored at these facilities.	☑ YES ☐ NO

PESTICIDE, HERBICIDE, AND FERTILIZER APPLICATIONS **Control Measure to reduce pollutants in discharges from municipal separate storm sewers associated with the application of pesticides, herbicides and fertilizer which will include, as appropriate, controls such as educational activities, permits, certifications and other measures for commercial applicators and distributors, and controls for application in public right-of-ways and at municipal facilities.**	
1. In accordance with 40 CFR §122.26 [Phase I], has the permittee developed a *Storm Water Management Program (SWMP),* that describes how the **Pesticide, Herbicide, and Fertilizer Applications** (PHFs) Control Measure will be implemented?	☑ YES ☐ NO
2. What pollutants of concern are targeted for reduction through the implementation of the **PHFs** program?	
Response Invasive Vegetation	
ORGANIZATIONAL STRUCTURE	
1. Is there a storm water team in place to ensure that the **PHFs** program is properly implemented?	☑ YES ☐ NO
2. Describe the organizational structure and staff responsibilities necessary to implement the **PHFs** program. Include the name, title, contact information, department name and key responsibilities of each team member.	
Response Valerie Esparza, Operation Manager for Vegetation Management and Street Sweeping Programs 210-207-8745 City of San Antonio Street Sweeping Program Transportation and Capital Improvements Department of the City of San Antonio 114 W. Commerce,6th Floor San Antonio, Texas 85205	
3. What co-permittee(s) or interagency departments participate in the implementation of the **PHFs** program?	
Response City of San Antonio-Transportation and Capital Improvement, Parks and Recreation, and San Antonio Muncipal Health Department. Texas Department of Transportation	
4. Describe any formal agreements and key areas of responsibility shared by the permittee, co-permittee(s), and or interagency departments have with the permittee to implement the **PHFs** program.	

Response City of San Antonio-Transportation and Capital Improvements and Texas Department of Transportation	
5. Do program participants *(e.g., permittee, co-permittee(s), other departments)* meet to discuss the progress of the program?	☑ YES ☐ NO
6. Describe the frequency of these meetings.	
Response Annual MS4 Meetings.	
LEGAL AUTHORITY	
1. Does the permittee have legal authority to implement the **PHFs** program?	☑ YES ☐ NO
2. What ordinances, codes, or policies provide this legal authority?	
Response: MS4 permit and Chapter 34 of the City Code	
3. Who *(e.g., specific staff, department, etc.)* has the authority to enforce this legal authority?	
Response: Transportation and Capital Improvements on City infrastructure	

FISCAL RESOURCES

1. What is the budget for the implementation of the **PHFs** program?	**REPORTING PERIOD**	**NEXT REPORTING PERIOD**
	Response	**Response**
	437,202	**437,202**

SECTION I: MEASURABLE GOALS

1. What are the Measurable Goals for the **PHFs** program and Best Management Practices *(BMP)* in place to reduce pollutants? Include expected quantifiable results.

Measurable Goal 1	Gallons of 1% solution sprayed Annually
Expected Quantifiable Results	Reduction in mowing needed.
Measurable Goal 2	
Expected Quantifiable Results	
Measurable Goal 3	
Expected Quantifiable Results	
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 handle, distribute and store PHFs?	☑ YES ☐ NO
2. If yes, describe the applicable training, certification or licensing and the required frequency for each.	
Response CEUs for license maintenance as well as ongoing training from vendors	
3. Is there a system in place to notify staff when required training is due and does it document the training completion date?	☑ YES ☐ NO

CONTRACTORS

1. Does the permittee hire contractors to manage its PHF applications? SAWS	☑ YES ☐ NO
2. If PHF applications are contracted what special certification does the permittee require from the	

contractors?	
Response : SAWS contracts includes requirements that Herbicide and pesticide application must be in compliance with the State of Texas Structural Pest Control Board and Regulations. The contractor or His/Her representative must have a copy of their pest control license on file with SAWS.	
PUBLIC	
1. What training has the permittee provided to the public about proper PHF distribution and storage?	
Response Through storm water website, community outreach and brochures	
2. How did permittee distribute educational materials to the public about PHFs?	
Response Community outreach and website	
SECTION III: MAINTENANCE	
1. Does the permittee evaluate the materials used and activities performed on public spaces, such as parks, schools, golf courses, easements, public rights of way, and other open spaces for pollution prevention opportunities?	☑ YES ☑ NO
2. If yes, what is the frequency of these evaluations and how were they documented?	
Response A annual evaluation of existing chemicals used, methods and the effectiveness by the applicators is determined each year to identify new needs and necessary changes to the program.	
3. What integrated pest management measures that rely on non-chemical solutions were implemented to minimize pollutants from landscaping? *(Check all that apply)*	
a. use of native plants, xeriscaping in arid/semi-arid regions *(reduces water usage and fertilization)*.	☑ YES ☐ NO
b. keeping clippings and leaves away from waterways and out of the street using mulching, composting, or landfills.	☑ YES ☐ NO
c. limiting application of pesticides and fertilizers if precipitation is forecast within 24 hours of application or as specified in label instructions.	☑ YES ☐ NO
d. limiting or replacing pesticide use (*e.g., manual weed and insect removal*).	☑ YES ☐ NO
e. limiting or eliminating the use of fertilizers or, if necessary, prohibiting application within 5 feet of pavement, 25 feet of a storm drain inlet, or 50 feet of a water source.	☑ YES ☐ NO
f. reducing mowing to allow for greater pollutant removal, but not jeopardizing motorist safety.	☐ YES ☑ NO
SECTION IV: STORAGE and APPLICATION	
1. Does the permittee contract **PHFs** services? **SAWS contracts PHF services at SAWS owned facilities.**	☑ YES ☐ NO
2. What professional credentials or certification is required from contractors to ensure they are qualified to conduct these services for the MS4?	

Response: SAWS requires the following information in our contracts for services. Texas Department of Agriculture – Commercial Pesticide Applicator License. For those contractors performing additional work any of the following licenses may also be required in the contract: Irrigation license, Backflow tester license, Nursery / Floral certification. Services are supervised by SAWS personnel.	
3. How many applicators are contracted?	
Response: SAWS contracts for Landscaping services which includes Herbicide application. SAWS also contracts for pest control services. Both annual contracts include Pesticide Applicators licenses to be on file with SAWS.	
4. Are any **PHFs** stored at municipal facilities?	☑ YES ☐ NO
5. What types of **PHFs** are stored?	
Response General classified herbicides and pesticides and water safe chemicals.	
6. What is the location of these **PHFs** and how are they stored when not in use?	
Response 1105 Callaghan Stored on dual containment structures and secured from the public	
7. In what amount and during what seasons are **PHFs** applied?	
Response Spring and Fall Applied according to label recommendations and target species	
8. Have **PHFs** ever been over-applied to the extent that they discharged into the MS4?	☐ YES ☑ NO
Response n/a	
9. If yes, describe how over-applications were addressed and improvements implemented to reduce and or prevent over-applications from reoccurring.	
Response n/a	
10. Are schedules developed for chemical application to minimize the discharge of such constituent due to irrigation and expected precipitation?	☑ YES ☐ NO
SECTION V: RECORDS MANAGEMENT	
1. Does the permittee have a database in place to track activities for the **PHFs** program?	☐ YES ☑ NO
Response Information is entered on Daily Unit Reports and TDA documents	
2. What information (e.g., educational materials distribution, training, storage records, and application records) about the **PHFs** program is tracked in a database?	
Response Amount applied, type of chemical used, locations, applicator, and equipment used	
3. Who has access to this database?	
Response Supervisor, Superintendent and Manager	
4. Who is responsible for updating the database?	
Response Supervisor	
5. Does the permittee update its SWMP to reflect current change and progress made in the PHFs program?	☑ YES ☐ NO
SECTION VI: ASSESSMENT	
1. Does the permittee assess the effectiveness of the **PHFs** program?	☑ YES ☐ NO
2. Based on the results of the effectiveness assessment, describe the positive results of the **PHFs** program.	
Response Reduction of visual obstruction and the reduction of damage to concrete channels	
3. Based on the results of the effectiveness assessment, what changes are proposed to enhance the **PHFs** program?	
Response None at this time	

4. Does the permittee have adequate staff and equipment to implement the **PHFs** program?	☑ YES ☐ NO
5. Does the permittee assess the **PHFs** program to determine if it meets Measurable Goals and other indicators?	☑ YES ☐ NO
6. Does the permittee assess the **PHFs** program's compliance with the permit requirements?	☑ YES ☐ NO
7. Does the permittee generate an assessment report of the **PHFs** program for its records?	☑ YES ☐ NO
8. What departments are involved in the **PHFs** program assessment?	
Response Transportation and Capital Improvements	

Completed by (Print Name): Arthur Reinhardt		
Signature:	**Date:** 2/28/15	
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Department: Transportation and Capital Improvements		
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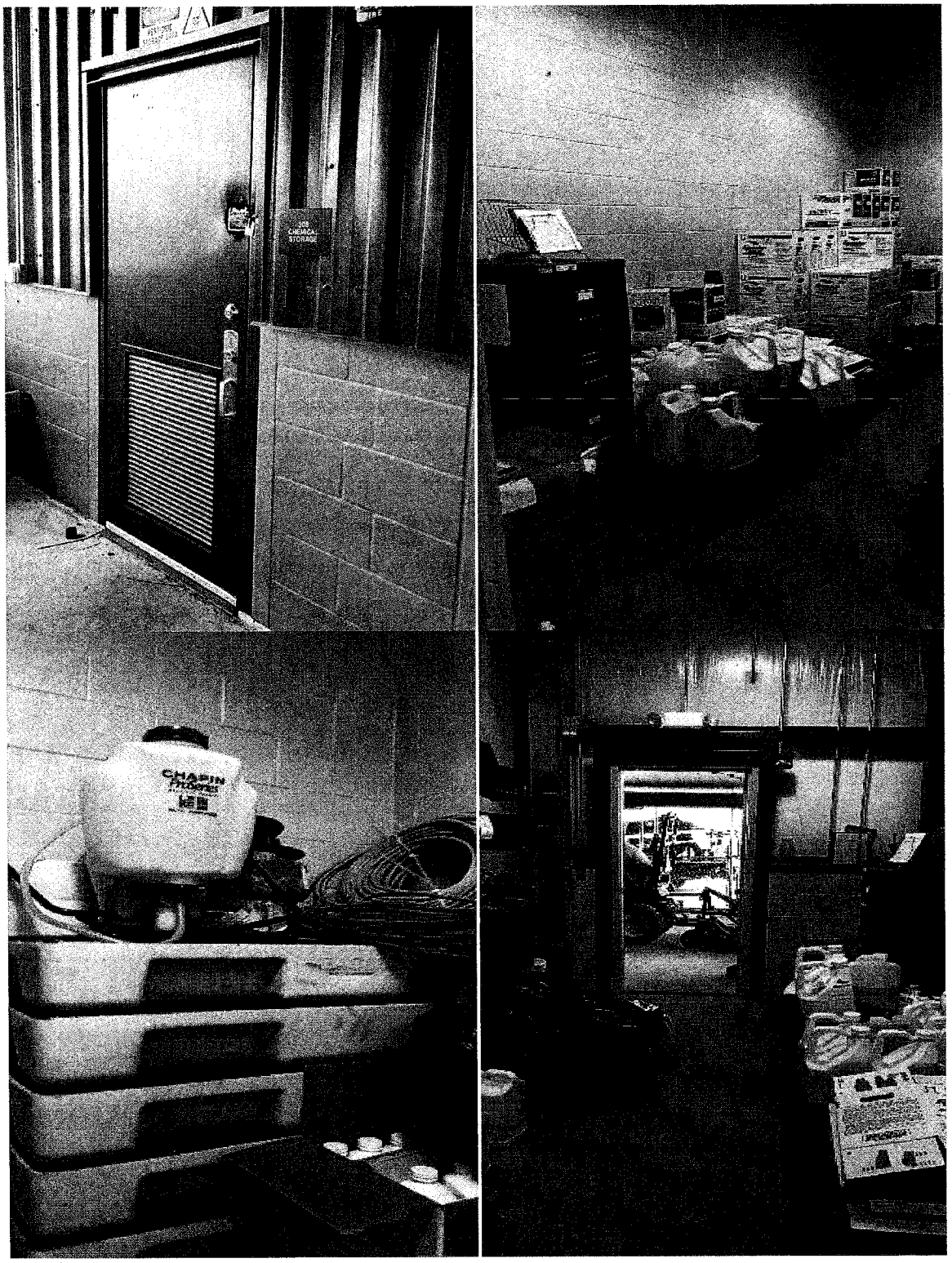
Herbicide Storage