

March 28, 2025

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

Re: Phase II MS4 Annual Report Transmittal for
Brazoria County Municipal Utility District No. 25
TPDES Authorization: **TXR040529**

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 TXR040529 for Brazoria County Municipal Utility District No. 25.

The annual report is for Year 6 - 01/01/2024-12/31/2024

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 12 in Houston, Texas.

Sincerely,

Justin Klump
Municipal Consultant

Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number TXR040000

A. General Information

Authorization Number: **TXR040529**

Reporting Year: 6

Annual Reporting Year Option Selected by MS4:

Calendar Year: X

Permit Year: N/A

Fiscal Year: N/A Last day of fiscal year: (N/A)

Reporting period beginning date: (month/date/year) 01/01/2024

Reporting period end date: (month/date/year) 12/31/2024

MS4 Operator Level: 2

Name of MS4: Brazoria County Municipal Utility District No. 25

Contact Name: Justin Klump Telephone Number: 281.587.5950

Mailing Address: 16110 Hollister Street, Houston, TX 77066

E-mail Address: JTKlump@swstx.com

A copy of the annual 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:
(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		SWMP submitted by deadline and has received approval.
Permittee is currently in compliance with recordkeeping and reporting requirements.	X		Year 5 annual report has been submitted.
Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.).	X		SWMP and year 5 annual report were submitted on time. No outstanding deficiencies.
Permittee conducted an annual review of its SWMP in conjunction with preparation of the annual report	X		SWMP was reviewed per the TXR040000 instructions.

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**):

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
1-5	Storm Water Consultant	<p>Yes.</p> <p>Brazoria County MUD No. 25 contracted Storm Water Solutions, LLC (SWS) to represent the District for the 5-year permit term and to professionally manage the SWMP on behalf of the District. The stormwater consultant is charged with implementing the BMPs as outlined in the SWMP. Other activities expected of the stormwater consultant include training sessions during board meetings, preparation of the annual report, interaction with the TCEQ, attendance at environmental conferences, etc. Using these vehicles of interaction will allow the consultant to better educate the Board, consultants, and the public, and hence, reduce discharge pollutants.</p>

1,2,3,5	Training Sessions for District Consultants and Public	<p>Yes.</p> <p>The storm water consultant hosted 2 training sessions relative to the new TXR040000 permit requirements during year 6. Training occurred during the public Board meeting. Training sessions involve the Board of directors and their consultants; the District engineer, the attorney, the bookkeeper, and the operator. These meetings are open to the public as well. Training sessions focus on the short term and long term goals associated with the SWMP, the status of implementation of the BMPs, TMDL Implementation in the area, and modifications needed to better control pollutants in storm water runoff.</p>
2-5	Storm Water Ordinance	<p>Yes.</p> <p>The Rate Order is currently in place.</p>
2,4	Conveyance Map	<p>Yes.</p> <p>The map of the District’s conveyance is updated on an ongoing basis.</p>
1,2	Stormwater Website	<p>Yes.</p> <p>The www.cleanbayous.org website is designed to be the focal point of the SWMP’s public education initiative. The website contains useful information for reducing stormwater pollution and improving stormwater quality. Cleanbayous.org is mobile friendly and equipped with reporting mechanism. Supplemental educational material (typically utility bill inserts) is designed to direct the residents to the website for more information. The “Resources” page contains the District’s SWMP, NOI, and year 5 annual report.</p>
1	Educational Material	<p>Yes.</p> <p>The year 5 annual report was added to www.cleanbayous.org. Educational material designed to inform & educate residents and businesses of the District’s commitment to preventing stormwater pollution currently exist on this website. The material focuses on stormwater pollution prevention and how residents can improve the quality of stormwater leaving the District. Utility bill inserts were mailed to residents and posted on this website.</p>
1,2	Community involvement	<p>Yes.</p> <p>The District Board of Directors had an agenda item for public discussion during their Board meetings. Residents/visitors may bring up any stormwater related item for discussion and/or action. Allowing the public another venue to voice concerns regarding stormwater pollution will encourage a more cohesive approach in achieving better stormwater quality. www.cleanbyous.org also has a reporting mechanism, which allows visitors to file complaints.</p>

2	Illicit Discharge Detection and Elimination	Yes. Illicit Discharge Detection and Elimination is addressed in the Stormwater Guidance Manual.
1-5	Stormwater Guidance Manual (GM)	Yes. The Stormwater Guidance Manual is in place and is updated on an as-needed basis.
2-5	Compliance & Regulatory Inspection Forms	Yes. The purpose of the compliance and regulatory inspections are to ensure that maintenance activities, maintenance schedules, and long-term inspection procedures of stormwater controls are being adhered to and to ensure that erosion and sediment control practices are being properly implemented. In an effort to improve stormwater quality, and adhere to permit requirements, the respective forms are part of the Stormwater Guidance Manual.
3	Construction Pollution Prevention Plan Template	Yes. The Construction Pollution Prevention Plan Template is part of the Stormwater Guidance Manual.
3	Regular Maintenance of District Construction Sites	Yes. Construction Site Stormwater Runoff Control Program is addressed in the Stormwater Guidance Manual. This chapter addresses the requirements for maintenance of construction sites within District's boundaries.
4	Post-Construction Stormwater Maintenance	Yes. Long term maintenance of post-construction stormwater controls is required.
5	Operations and Maintenance	Yes. Monthly operations reports are brought to Board meetings and Board members are updated on the status of the District's facilities.
4,5	Regular Maintenance of Drainage Ways and Appurtenances	Yes. It is the District's responsibility to maintain all storm sewers within District's boundaries as well as all drainage ways and appurtenances. Maintenance of these are performed on a routine basis.

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**):

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
1	Public education	Website	1	Uploading Educational Material	No. Though this BMP does not result in a direct reduction of pollutants, educating the citizens will eventually reduce litter, hence pollutants.
2	IDDE Program	Website	0	Utilizing Reporting Mechanism	Yes. When residents observe an illicit discharge and use the website's reporting mechanism, it reduces the amount the pollutant that would have been otherwise unaddressed.
3	Construction Site Runoff Control Program	Construction Sites	All	Inspections	Yes. Inspections allow for determining if proper BMPs are in place to reduce sediment discharge and erosion.
3	Construction Site Runoff Control Program	NOIs	All received by MS4 Operator	Reviews	Yes. By ensuring contractors have permit coverage, we can evaluate if the SWPPP is effective in reducing sediment discharge and erosion.
4	Post Construction Stormwater Maintenance Program	Plans	All received by MS4 Operator	Reviews	No. The pollutants will be reduced over time as the permanent post-construction BMPs are utilized.
5	Operations & Maintenance Program	Board Reports	12	Condition of District Facilities	Yes. Proper condition of the District facilities is critical for meeting permit standards on a consistent basis.
4,5	Maintenance of District Facilities	Drainage ways and appurtenances	All	Mowing, maintenance, and erosion control	Yes. Proper mowing and maintenance of drainage ways and appurtenances reduces erosion and prevents silt from entering into waterways.
1,2,3,5	Training	SWMP	2	Board Meetings	No. Though this BMP does not result in a direct reduction of pollutants, educating and training the citizens MS4 Operator consultants and will inform both groups how to improve stormwater quality.

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**):

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
1-5	Stormwater Consultant	The District retained the services of a Stormwater Consultant who is responsible for implementing Best Management Practices.
1,2,3,5	Training Sessions for District Consultants and Public	The stormwater consultant hosted 2 training sessions relative to the new TXR040000 permit requirements during year 6. Training occurred during a public Board meeting. Training sessions involve the Board of directors and their consultants; the District engineer, the attorney, the bookkeeper, and the operator. These meetings are open to the public as well.
2-5	Storm Water Ordinance	The Rate Order is currently in place.
2,4	Conveyance Map	There is an existing conveyance map of the stormwater conveyance system. The conveyance map is updated as necessary.
1,2	Stormwater Website	The www.cleanbayous.org website is designed to be the focal point of the SWMP's public education initiative. Cleanbayous.org is mobile friendly and equipped with reporting mechanism. The "Resources" page contains the District's SWMP, NOI, and year 5 annual report.
1	Educational Material	The year 5 annual report was added to www.cleanbayous.org . Educational material designed to inform & educate residents and businesses of the District's commitment to preventing stormwater pollution was added to this website.
1,2	Community involvement	The District Board of Directors had an agenda item for public discussion during their Board meetings. Residents/visitors may bring up any stormwater related item for discussion and/or action. Allowing the public another venue to voice concerns regarding stormwater pollution will encourage a more cohesive approach in achieving better stormwater quality. www.cleanbyous.org also has a reporting mechanism, which allows visitors to file complaints.
2	Illicit Discharge Detection and Elimination	Illicit Discharge Detection and Elimination is addressed in the Stormwater Guidance Manual.
1-5	Stormwater Guidance Manual (GM)	The Stormwater Guidance Manual is in place and is updated on an as-needed basis.
2-5	Compliance & Regulatory Inspection Forms	These forms are part of the Stormwater Guidance Manual and are available for use.

3	Construction Pollution Prevention Plan Template	The Construction Pollution Prevention Plan Template is part of the Stormwater Guidance Manual and is available for use.
3	Regular Maintenance of District Construction Sites	Construction Site Stormwater Runoff Control Program is addressed in the Stormwater Guidance Manual. This chapter addresses the requirements for maintenance of construction sites within District's boundaries.
4	Post-Construction Stormwater Maintenance	Long term maintenance of post-construction stormwater controls is required.
5	Operations and Maintenance	Monthly operations reports are brought to Board meetings, where Board members are updated on the status of the District's facilities.
4,5	Regular Maintenance of Drainage Ways and Appurtenances	Maintenance of District drainage ways and appurtenances by qualified personnel.

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.?

The District did not perform analytical monitoring of stormwater quality during year 6.

Cleanbayous.org contains educational material relative to stormwater quality. The site is mobile friendly, which allows residents to report illicit discharges and construction site runoff concerns in a quicker, easier fashion. Furthermore, the website now allows visitors to include picture when reporting illicit discharges via the reporting mechanism.

- Board of Directors and consultants were educated/trained on the goals of the SWMP, including bacteria-specific elements during public Board meeting.
- Monitored permit limits for the WWTF.
- Ensured reporting of any sanitary sewer overflows to the District Board.
- Continued to update stormwater conveyance map as necessary to be used as part of the Illicit Discharge Detection and Elimination Program.
- A Stormwater Guidance Manual is in place.

Maintenance of District drainage ways and appurtenances are done on an as-needed basis by qualified personnel.

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.

The waterbodies receiving discharge within the permitted area were on the previous Texas Integrated Report of Surface Water Quality for CWA Sections 305(b) and 303(d) and remain on the new one.

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.

TMDL documents state the sources for indicator bacteria vary, and there is no single predominant source. Bacteria specific to humans, avian, and non-avian wildlife and domestic animals all accounted for appreciable portions of the loadings. The I-Plan referenced to write the SWMP summarizes information found in the TMDL documents for potential pollution sources. The MS4 Operator has reviewed the potential sources of bacteria as identified in the I-Plan, as well as the strategies proposed to address these potential sources. The I-Plan strategies are intended to be implemented on a watershed basis, however, some of the strategies do not apply within the jurisdiction of the MS4 Operator. Goals listed in the SWMP, including those relative to TMDLs, and reported in previous sections of this annual report have been achieved. Furthermore, the following sections will give more detail of the additional BMPs used to address the pollutant of concern.

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

The SWMP goals are consistent with the rules written in the TXR040000, as well as the goals written in the respective TMDL documents. Each BMP mentioned in the SWMP shares an overarching goal of controlling the discharge(s) of the pollutant of concern (bacteria) to impaired waters and waters with an approved TMDL, and is intensive on detecting, addressing, and eliminating the bacteria impairment.

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
Bacteria	N/A	The TMDL for Bacteria Waters in the Upper Gulf Coast uses concentration based Pollutant Waste Load and Load Allocations for the Upper Gulf Coast segments. The Waste Load Allocation for MS4s in the watershed states “Numerical concentration requirements are unreasonable for storm water runoff. This TMDL will require MS4s to follow implementation of bacteria reduction efforts and best management practices”	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
Bacteria	BMP 1.1 - Monitor permit limits for the WWTF	Knowledge of permit limits for WWTF is critical for meeting permit standards on a consistent basis.
Bacteria	BMP 1.2 Facilities Assessment	Assessment of the WWTF is vital to the proper operation and the facility’s ability’s to meet permit limits.
Bacteria	BMP 2.1 Mapping of Sanitary Sewer System	Necessary for the reporting of SSO’s and other bacteria-related events that cause pollution.

Bacteria	BMP 2.2 Reporting of Sanitary Sewer Overflows (SSOs)	Monthly reporting of SSOs at Board meetings will provide vital statistics to ensure proper management of these pollution-causing events.
Bacteria	BMP 2.3 Facilities Assessment	Reviewing the conditions of the sanitary sewer system on a periodic basis to determine if problems exist that may lead to non-compliance with effluent conditions is essential in reducing the discharge of bacteria.
Bacteria	BMP 2.4 Reporting and maintenance of Lift Station Functions	Reviewing the existing lift stations with the goal of developing an overall operations and inspection plan to be implemented on a regular basis, is crucial for addressing pollutant(s) of concern.
Bacteria	BMP 2.5 Sanitary Sewer Use Requirements	Proper use of the sanitary sewer system by all registered customers within the MS4 Operator's jurisdiction is critical for compliance with stream standards. This program element will include a review of existing rules and regulations of the MS4 Operator, including subscriber system contracts, as applicable, in order to ensure proper use of the system. Emphasis will be placed on rules that govern the ownership and operations of grease traps, grit traps and the discharge of fats, oils and grease into the sanitary system.
Bacteria	BMP 3.1 Illicit Discharge and Dumping	Because illicit discharge and dumping can introduce pollutants both directly and indirectly into the waterways, rules and regulations are in place to address these offenses.
Bacteria	BMP 4.1 MS4 Operator Consultant and Public Training	In order to better prevent the discharge of pollutants, Operator consultants and the public must be made aware of what is required in the SWMP.
Bacteria	BMP 5.0 Residential/ Public Education – Animal Sources	Public education relative to pet waste is essential in reminding the public of the detriments of bacteria and to pick up after their pets.

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

Description of bacteria-focused BMP	Comments/Discussion
BMP 1.1 - Monitor permit limits for the WWTF	Follows I Plan recommendations
BMP 1.2 Facilities Assessment	Follows I Plan recommendations
BMP 2.1 Mapping of Sanitary Sewer System	Follows I Plan recommendations
BMP 2.2 Reporting of Sanitary Sewer Overflows (SSOs)	Follows I Plan recommendations
BMP 2.3 Facilities Assessment	Follows I Plan recommendations
BMP 2.4 Reporting and maintenance of Lift Station Functions	Follows I Plan recommendations
BMP 2.5 Sanitary Sewer Use Requirements	Follows I Plan recommendations
BMP 3.1 Illicit Discharge and Dumping	Follows I Plan recommendations
BMP 4.1 MS4 Operator Consultant and Public Training	Follows I Plan recommendations
BMP 5.1 Residential/ Public Education – Animal Sources	Follows I Plan recommendations

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

Benchmark Indicator	Description/Comments
Annual Report written and submitted to the TCEQ	As required by the TXR040000 of regulated MS4s.
SWMP, NOI and year 5 annual report accessible to public via cleanbayous.org	Public Education, Outreach, and Involvement.
Public education added to Cleanbayous.org.	Public Education, Outreach, and Involvement.
Conducted training session relative to goals of SWMP, including bacteria specific elements, to the MS4 Operator Consultants and any public in attendance.	Education is fundamental to continued compliance.
Stormwater conveyance map updated as necessary.	Mapping of the MS4’s storm sewer system essential in order to better locate, track, and inventory illicit discharges.
Stormwater Guidance Manual is completed and is updated on an as-needed basis.	A comprehensive manual allows for clear direction and instruction as to how the MS4 deals with stormwater discharges and illicit discharges.
Facilities Assessment & Monitoring of Permit Limits for the WWTF	Findings outlined in the District operator’s reports ensures the District is informed as to the status of the facilities and that appropriate action is taken.
Reporting of Sanitary Sewer Overflows	Reporting such instances allows for transparency accountability between the Board, the public and the consultants.
Lift station inventory	A lift station inventory will aid management and operations’ personnel in determining the location and overall conditions of the lift stations.

E. Stormwater Activities

Describe activities planned for the next reporting year:

A new SWMP has been written pursuant to the Small MS4 Permit issued on August 15, 2024. The NOI is currently under review, and year 1 implementation efforts will begin this year and be recorded in the year 1 annual report under the new permit term.

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)
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.

BMP	Description	Implementation Schedule (start date, etc.)	Status/Completion Date (completed, in progress, not started)
All	N/A	N/A	Additional BMPs not deemed 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).

- 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

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

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	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): Sam Anawaty Title: president

Signature:  Date: 02/21/2025

Name of MS4: Brazoria County MUD 25 - TXR040529