

CITY OF MIDLAND

STORM WATER MANAGEMENT PLAN

1.0 EXECUTIVE SUMMARY

The City of Midland originally developed a storm water management plan (SWMP) as required for coverage under the Texas Pollutant Discharge Elimination System (TPDES) General Permit No. TXR040000 in 2007. This plan has been updated annually, including the December 2023 TPDES General Permit.

The SWMP includes a listing of Best Management Practices (BMP's) that have been and will be implemented by the City in order to achieve the regulatory standard of reducing pollutants in the City's storm water to the "maximum extent practicable." Existing City of Midland storm water programs and activities designed to protect the City's water quality will be supplemented with new BMP activities required in the new permit.

For the 2007 permit, measurable goals and an implementation schedule were developed for each of the BMP's in the SWMP. The BMP's, measurable goals, implementation schedule, and final SWMP were developed with input from the City's Storm Water Advisory Committee and review by the City Council.

BMP's, measurable goals, and the implementation schedule were selected based upon their ability to meet specific permit requirements and to reduce pollutants in the City's storm water to the maximum extent practicable. They were also selected based upon a general assessment of BMP effectiveness, applicability to Midland, and costs associated with implementation of the BMP's.

Effectiveness of the selected BMP's, and success in achieving the selected measurable goals has been reviewed annually, and appropriate changes made. Additional BMP's and measurable goals were selected to comply with the 2025 permit.

2.0 PLAN DEVELOPMENT PROCESS

Permit Requirement and Coverage

The City of Midland owns and operates a Municipal Separate Storm Sewer System (MS4), which is a system of roads, streets, catch basins, curbs, gutters, ditches, man-made channels, and storm drains. Midland also contains urbanized areas according to the census map in the 2000 and 2010 censuses, and therefore the City must obtain authorization from the Texas Commission of Environmental Quality to discharge stormwater from the MS4.

The City of Midland (City) is eligible for coverage under Texas Pollutant Discharge Elimination System (TPDES) General Permit TXR040000 (General Permit). The coverage of the permit is limited to those areas that are located within the urbanized area and within the city limits of Midland, although most BMP's will be applicable to the entire City.

The City of Midland is classified as level 4, for cities with population exceeding 100,000 in the city limits and also has an "urban areas with a population of at least 50,000", as defined by the 2020 census. In 2023, TCEQ changed the terminology in the general permit and removed the term "Urbanized Area" and now will use the phrase "urban areas with a population of at least 50,000" which is based on Decennial Census results of 2000, 2010 and 2020.

Purpose and Scope

The City of Midland has developed a storm water management plan (SWMP) in accordance with TPDES requirements for obtaining authorization for storm water discharges and certain non-storm water discharges. This SWMP has been developed in accordance with guidelines published by the Texas Commission on Environmental Quality (TCEQ) for coverage under the referenced permit. The SWMP has been developed to facilitate the City's efforts in reducing storm water pollutants from their MS4 to the maximum extent practicable as required by the TPDES General Permit.

The SWMP describes specific actions that will be taken over a five-year period to reduce pollutants and protect the City's storm water quality. The specific activities to be implemented are referred to as "Best Management Practices" (BMP's). Various BMP's have been developed for each of the seven "Minimum Control Measures" (MCM' s) required by the General Permit. The SWMP also sets measurable goals and provides a schedule for the implementation of the BMP's. Implementation of the selected BMP's is expected to result in reductions of pollutants discharged into Midland's drainage channels, parks, and playa lakes.

Participating Entities

Implementation of the City of Midland's SWMP does not rely upon activities of any other entity. No inter-local agreements were formed. However, the storm water advisory committee contained of representatives of TxDOT, Midland County, and Midland College, which at the time, were viewed as possible partners.

BMP Selection

In anticipation of stormwater quality regulations, a Storm Water Advisory Committee was formed in 2002 to provide guidance in the selection of BMP's and the development of Midland's SWMP.

Permit Term from 2007 – 2013

The City of Midland took credit for existing programs that would limit pollutant discharges. Details of the City's existing storm water-related programs were collected, summarized, and categorized into one of the six MCM's required by the General Permit. Additional BMP's were selected to supplement the City's existing programs and to fulfill the requirements of the Permit.

During the permit term, annual reports were submitted to TCEQ, and the Best Management Practices that did not seem to be achieving results were eliminated or replaced with other BMP's.

Permit Term from 2013 – 2018

This general permit was far more specific in its requirements than the permit for the first term. Thus, many new BMP's and Measurable Goals were added to the implementation plan. Selection of these items was guided by applicability to the Midland MS4 and where possible, by how easily the BMP could be integrated into the Midland operational structure and standard practices.

Permit Term from 2019-2024

The latest general permit adds a few requirements and refines the requirements for others. A few new BMPs with measurable goals were added. However, some of the previous BMPs, having been fully implemented, did not need to be broken out into steps. Names of these mature programs were consolidated where possible, without reducing the content.

Permit Term from 2025-2029

TCEQ granted administrative continuance to Small MS4 operators with existing coverage until a new permit was issued in August of 2024. The newly finalized permit separated MCM's 1 & 2. MCM 1 is Public Education and Outreach while MCM 2 is now Public Involvement and Participation. These changes renumbered the existing MCM's 3-8, the 8th MCM is now optional. These must be implemented by permittees based on their level of the MS4 in which they operate.

Selection of Measurable Goals and Implementation Schedule

Specific measurable goals have been developed for each BMP selected for inclusion into the City's SWMP. In accordance with the General Permit requirements, measurable goals have been developed to provide a mechanism for measuring the success of the City's SWMP toward reaching the goal of protecting the City's water quality and reducing pollutants to the maximum extent practicable. As provided under the General Permit, the City may phase in the implementation of the SWMP over a five-year period. Accordingly, a reasonable progression of measurable goals was developed for each of the selected BMP's. The goals were selected with a consideration toward developing a logical progression of implementation, assessing the ability to measure and track progress, and working within budgetary constraints.

Implementation Procedures for the Stormwater Management Plan

The City Stormwater Ordinance designates a "Stormwater Administrator" as the Assistant City Manager to whom the Director of Engineering Services reports, and makes that person responsible for administration, implementation and enforcement of the ordinance. A position of "Storm Water Administrator" was created in 2018, and many of the functions in the ordinance were delegated to that position. However, the "Stormwater Administrator" in the ordinance, the Assistant City Manager named, retains overall program implementation authority.

The stormwater management plan for the previous permit was chiefly administered and documented by the City Engineer's office in the Engineering Services Department. The GIS (geographic information system) Division was instrumental in assisting with the web site and with the many mapping activities required by the permit.

The program elements were developed with assistance of the end users of the program, including the staff at the operations complex for the City, including traffic, street and water/wastewater maintenance yards. The City garage staff have also helped to verify compliance with permit requirements. Health Department and Code Administration have been involved in their roles of illegal dumping and other non-stormwater discharge investigations. Fire Department staff respond to spills, which often are located in the MS4 roadways..

In the future, all of the above groups will need to remain active in the implementation of the program.

3.0 REGULATORY AND PROGRAMMATIC ELEMENTS

This permit has specific requirements requiring the City of Midland to adopt ordinances or other legal authority that meet the following requirements. The SWMP is required to include an MCM related to the adoption of legal authority.

The City of Midland adopted Ordinance 9513 in December 2015, which is codified as the Stormwater Management Code. This ordinance includes the following elements that are required by the permit and apply to Midland.

- Provides authority to prohibit illicit discharges and connections.
- Gives authority to control spills and prohibit dumping materials other than stormwater.
- Gives authority to require compliance.
- Gives authority to require structural BMPs, including maintenance.
- Gives authority to receive and collect information needed to assess compliance from construction sites, land developers, and industrial and commercial owners.
- Gives authority to enter and inspect private property related to stormwater.
- Gives authority to respond to non-compliance with BMPs.
- Gives authority to assess penalties.
- Gives authority to enter into interagency agreements.
- Addresses construction stormwater and include sanctions to ensure compliance.
- Requires compliance with TPDES construction permit.
- Prohibits discharge of concrete washout, water well drilling wastewater, washout of paint and other construction materials, dumping of fuel, oils, or other maintenance pollutants, soaps and solvents used for vehicle washing, and discharges from dewatering.
- Addresses post-construction runoff, requiring developers to follow stormwater runoff control standards in City manuals and ordinances.

Other permit requirements not part of any minimum control measure include:

- The permit states that the permittee has a responsibility to ensure that it has funding to implement the requirements of the permit.
- A standard operating procedure will be developed for enforcement measures.

There are also special requirements for certain locations. The following analysis shows that none of them will apply to the City of Midland, and Midland will have no extra requirements related to them.

- There are extra requirements if the city in question drains to a water that has an approved TMDL.
 - The drainways in Midland eventually connect to the Colorado River and to Lake Spence.
 - There is a TMDL for Lake E. V. Spence, Segment 1411, for Sulfate and Total Dissolved Solids.
 - However, the study area used for the TMDL allocations did not extend upstream of Big Spring, Texas. This reflects the reality that flow from the City of Midland does not usually reach Lake E.V. Spence.
 - The TMDL allocates certain pollutant loads to entities in the watershed. The City of

Midland is not included in these allocations.

- It is concluded that the City of Midland has no additional requirements related to the Lake E.V. Spence TMDL.
- Impaired water body. If there is a discharge is DIRECTLY to an impaired water body, but there is no TMDL for that body, there are additional requirements.
 - The nearest named segment of surface water to Midland is Beals Creek, segment 1412B, whose upstream end is in Howard County west of Big Spring.
 - Thus, the City of Midland does not discharge directly to any water body.
 - Although segment 1412B is listed as an impaired water body in the 2024 Texas 303(d) list of impaired water bodies, additional requirements will not apply to Midland, Texas. Beals Creek was found to be impaired with bacteria and selenium.
 - The 2025 permits adds a provision that the City annually verify that the MS4 does not drain directly to an impaired water body. This requirement was added to MCM 1 because it is done in conjunction with the annual report.
- Edwards Aquifer areas have additional requirements
 - The City of Midland does not lie over the Edwards Aquifer recharge zone.

4.0 LIST OF BMP'S, MEASURABLE GOALS, AND IMPLEMENTATION SCHEDULE

In accordance with TCEQ's General Permit requirements, Midland SWMP has now separated MCM's 1 & 2. MCM 1 Public Education and Outreach and MCM 2 – Public Involvement/Participation which adds to the existing 7 MCM's, creating 8 MCM's. Midland's SWMP includes an implementation plan for BMP's in each of seven Minimum Control Measures for the permit term of 2019-2024. The new permit for term cycle 2025-2029 increases MCM's to 8, which the City of Midland will implement during the permit cycle to comply with the general permit TXR040000 issued by TCEQ. The existing seven minimum control measures are listed below with the two newly separated MCM's included for implementation as well with the 8th being optional. The City of Midland has not chosen to implement the optional MCM 8, Authorization for Construction Activities where the Small MS4 is the Site Operator.

1. Public Education, Outreach, and Involvement
2. Public Involvement/Participation
3. Illicit Discharge Detection and Elimination (IDDE)
4. Construction Site Stormwater Runoff Control
5. Post-Construction Stormwater Management in New Development and Redevelopment
6. Pollution Prevention and Housekeeping for Municipal Operations
7. Industrial Stormwater Sources
8. Authorization for Construction Activities Where the MS4 is the Site Operator (Optional)

A summary of specific requirements of each MCM are provided below. Complete text of each item can be found in the appendix, which is the current TXR040000 general permit. Following each listing of MCM requirements, a table is provided that lists the BMP' s selected for that MCM, along with a description of the BMP and its measurable goals and implementation schedule.

MCM 1: Public Education, Outreach

The 2025-2029 permit requirements for this Minimum Control Measure be separated and create a new MCM 1 to match federal requirements, as applied to the City of Midland, include a comprehensive stormwater education and outreach program to educate public employees, businesses, and the public of hazards associated with illegal discharges of waste and impact on local waterways, and how to reduce pollutants. Midland will meet these minimum requirements using the selected BMPs. They will:

- Comply with state notice requirements when implementing activities related to the SWMP.
- Define goals and objectives of the program based on high priority community wide issues.
 - The stormwater advisory committee concluded that Midland has few water bodies likely to be impacted by stormwater runoff pollution. The majority of rainfall runoff is conveyed outside the city via Midland Draw, which is normally dry. In general, runoff from this area soaks into the earth and does not reach downstream receiving bodies such as Lake Spence. Therefore, it should be a top priority to protect those few water bodies located within or near the City.
 - Due to high winds, blowing trash continues to be an issue in this region. This material can wash into draws and drainage structures in the infrequent heavy rains.
 - The City has identified floatables as an issue in the drainage channels. These are reduced by litter pickup programs.
- Midland has identified the target audiences.
 - City employees that could spot illicit discharges or connections.
 - City employees needing training on good housekeeping and pollution prevention.
 - City staff involved in the construction stormwater review and inspection process.
 - The general public.
- Has and will develop or use educational materials.
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 - In previous permit terms, the City developed appropriate training modules for employees who inspect and review construction sites, for good housekeeping on City facilities, and for employees who may notice illicit discharges.
 - The three training modules have been presented to all appropriate employees in previous permit terms. The 2025-2029 SWMP proposes a schedule for continued training.
- Has and will determine cost effective and practical methods for distribution of materials.
 - The City has determined that the storm water web site is the best method to distribute information.
 - Additional public education materials can be added to the web site in compliance with the 2025-2029 SWMP.
- Consider using public input in the implementation of the program.
 - A Stormwater Advisory Committee was used to create the original SWMP.
- If feasible create opportunities for citizen participation.
 - The City of Midland continues to support various litter pickup programs that assist in ridding the drainage facilities and vacant lots of debris.
- Ensure the public can easily find information about the SWMP.
 - The SWMP is to be included on the City web site.
 - The latest general permit adds a requirement to put the annual report on the website.

Public Input in the SWMP Development Process

For development of 2013-2018, 2019-2024 and the 2025 -2029 permit SWMPs, it was determined that conditions had not significantly changed with respect to stormwater quality issues since 2007. Therefore, public input from the 2007 permit term was considered still valid.

City of Midland took a proactive approach to stormwater management, creating a Storm Water Advisory Committee in 2002 with the task of advising City Council on issues of stormwater quality management. The Advisory Committee also chose to report and advise on stormwater quantity management.

Advisory Committee meetings were held on the following dates:

June 20, 2002,

October 24, 2002

November 21, 2002

January 16, 2003

May 8, 2003

August 28, 2003

December 18, 2003

The Storm Water Advisory Committee meetings culminated in the development of a Draft Storm Water Management Plan. Review and comment was provided by the Midland City Council during a Council briefing session on February 10, 2004. Revisions were made by City Staff in 2008 after the TPDES Small MS4 permit was issued by TCEQ.

MCM 2: Public Involvement/Participation

The new permit created a change with the for the existing MCM 2 requirements from IDDE awareness to public involvement and participation. These changes are in three parts, (a), (b) & (C). (A) requires adding BMPs for each MS4 Operator as well as measurable goals that engage in public awareness and involvement. (B), includes supplying the public with necessary tools and equipment for both volunteer and educational purposes. (C), mentions joining other MS4 operators for a cost-effective approach and program maximization.

Currently, the City of Midland partners with Keep Midland Beautiful (KMB) which encourages citizens to take part in clean-up efforts multiple times a year in the community while educating citizens on the impacts of stormwater runoff and improving the water quality.

As a level 4 Phase II MS4, Midland is required to implement four BMPs for public involvement and participation. These BMPs would greatly benefit the city as they aim to find out what the public needs or would like to see with respect to the MS4. The City of Midland already performs some of the new BMP's selected and would add to existing programs to further improve stormwater quality throughout the MS4. So far, current BMP's have been successful and are as follows:

Activity/BMP	Measurable Goals
Keep Midland Beautiful partnership, cleans draws and channels within MS4 Boundaries	The City of Midland partners with Keep Midland Beautiful for 2 events annually to satisfy this requirement of the new updated SWMP 2025-2029 permit cycle.
Habitat Improvement. Tree planting in city parks	The City of Midland participates in partnerships with KMB and TreeKeepers in 4 events annually, 2 events are on National Arbor Day and Texas Arbor Day. Each event continues each year for the 2025-2029 permit cycle.
Educational Display	The City of Midland will provide educational stormwater displays at local school or public event once yearly each year for the 2025-2029 permit cycle.
Public Meeting	Support public meetings for input from the public on effectiveness of BMP. For each year of permit cycle 2025-2029

MCM 3: Illicit Discharge Detection and Elimination

The discharges into the street system, channels and ponds in Midland that are authorized under this permit include:

- Stormwater runoff
- The following Non-Stormwater flows:
 - Water line flushing discharges, but not if hyper-chlorinated
 - Runoff from irrigation
 - Discharges from potable water sources that don't violate Texas Surface Water Quality Standards
 - Diverted stream flows (there are none in Midland)
 - Rising ground waters and springs
 - Uncontaminated ground water infiltration
 - Uncontaminated pumped ground water
 - Foundation and footing drains
 - Air conditioning condensation
 - Water from crawl space pumps
 - Individual residential vehicle washing
 - Flows from wetlands and riparian habitats
 - De-chlorinated swimming pool discharges that don't violate Texas Surface Water Quality Standards
 - Street wash water, but excluding street sweeper waste water
 - Flow from emergency firefighting activities, not including washing of trucks, training activities, test water from fire suppression systems, etc.
- Allowable non-stormwater discharges defined as: those non-stormwater flows that have not been identified by the City of Midland or by TCEQ as a significant source of pollutants to the City of Midland.

Any flow into the MS4 that is not on the list above is classified as an illicit discharge. Illicit discharges could also include illegal dumping or connections to the storm drain system of sanitary sewer or other unauthorized lines. The City will develop, implement and enforce a program to detect, investigate and eliminate such illicit discharges. Following is a list of the permit requirements that apply to the City of Midland:

- Mapping -
 - Keep the MS4 map updated, including location of all outfalls and name of all surface waters receiving flow from the outfalls.
 - Midland as a Level 4 MS4 is required to identify priority areas likely to have illicit discharges.
- Put priority areas for illicit discharges on the map. Training –
 - Have methods for informing and training MS4 field staff that may observe an illicit discharge or connection as part of their normal job. Materials and attendance lists must be maintained for TCEQ review.
 - Appropriate training materials were developed in prior permit terms. The City will

- continue training on the schedule in this SWMP.
- Investigation of Illicit Discharges -
 - Have procedures for responding to illicit discharges and spills, including inspections in response to complaints.
 - High risk of pollution raises the priority of investigation.
 - Report any threat to human health or the environment to TCEQ
 - Document all investigations, with results, follow-up and date investigation closed.
 - Investigate the source of illicit discharges that come to the attention of the City.
 - Publicize and facilitate public reporting of illicit discharges via the web site. (See MCM 1)
 - Conduct inspections in response to complaints.
 - Required procedures were developed in prior permit terms. The 2019-2024 SWMP includes continuing the use of established procedures.
 - Elimination of Illicit Discharges –Have procedures for removing the source of the illicit discharge.
 - Notify responsible party of the problem and their responsibility to correct.
 - Use enforcement procedures from the Stormwater ordinance.
 - Midland must have procedures to prevent and correct leaking onsite sewage disposal systems that discharge to the MS4.
 - The required procedures were developed in prior permit terms. The 2019-2024 SWMP includes continuing use of established procedures.
 - Follow-up Investigations – Additional requirement for Level 4 cities
 - Midland will conduct a follow-up investigation to verify the illicit discharge has been eliminated. The City can recover costs from the responsible party.
 - Priority Areas for Illicit Discharges – Identify priority areas likely to have illicit discharges
 - The City must have procedures to identify priority areas, a list of all such areas, and document why they were selected.
 - During previous permit terms, after consultation with TCEQ, it was determined that the nearest surface water is located outside the City of Midland. Therefore the outfalls were designated to be the three points on the eastern City limits where runoff leaves the City.
 - These points were then designated as the priority areas for illicit discharges.
 - The current permit SWMP includes an opportunity to add additional priority areas if needed.
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 - Dry Weather Field Screening– Additional requirement for Level 4 Cities
 - Midland has a written dry weather field screening program to detect illicit discharges. It must include:
 - Have written procedures for observing flows from outfalls after 72 hours dry weather.
 - Visit priority areas first and screen all of the priority areas within the permit term.
 - Have written procedures to determine which flows will be screened.
 - At a minimum, when visual observation shows signs of contamination, the City

shall conduct a field screening analysis for indicator pollutants, and document the method used.

- The 2025-2029 SWMP includes a provision to evaluate and adjust field screening procedures during the permit term.
- Reduction of Floatables – A continued requirement in 2025-2029 permit term
 - The City must implement a program to reduce discharge of floatables in the MS4, using source controls as a minimum and structural or other appropriate control where necessary.
 - The City must maintain two locations where floatable material can be removed before stormwater is discharged to or from the MS4. These locations must be emptied at least two times per year, and the amount collected must be estimated.
 - Amount collected must be in the annual report.
 - The City must implement a total of 2 source controls to address floatables, programs already exists with partnership with non-profit agencies helps reduce floatables drastically from our structural controls.
 - Develop and maintain 2 structural controls to reduce floatables.
 - The SWMP contains a schedule for selecting appropriate sites, procedures and construction (if needed).

MCM 4: Construction Site Stormwater Runoff Control

The City has developed, implemented, and enforced a program requiring operators of small and large construction sites to have stormwater control measures. The City:

- Has an ordinance and sanctions for non-compliance.
 - The ordinance prohibits certain types of non-stormwater discharges for construction. These are on the list of non-stormwater discharges not covered by this MS4 permit.
 - The ordinance
 - requires that all construction sites have developed and implemented a SWP3 in accordance with the TPDES permit and for construction stormwater.
 - In arid or semi-arid areas such as Midland, the City has an option to delay initiation of vegetative stabilization measures on construction sites. The City did not choose to include this option in the ordinance due to concerns for blowing sand and dust.
- Other requirements for Midland include:
 - Midland prohibits certain discharges as required by the general permit.
 - Midland has site plan review procedures developed in earlier permit terms.
 - Midland implemented procedures for inspecting construction, and for follow-up to ensure compliance in previous permit terms.
 - Midland has procedures for receiving and consideration of information submitted by the public.
 - The City has implemented a staff training program for those who are involved in construction review and inspection.
 - Midland maintains an inventory of all permitted construction sites, required for Level 4 cities.
- For the 2025-2029 permit term, the SWMP schedule includes review of the ordinance, procedures and policies related to this MCM.

MCM 5: Post-Construction Storm Water Management in New Development and Redevelopment

The City has developed, implemented and enforced a program to control stormwater discharges from new development and redeveloped sites that disturb more than one acre, or smaller sites that are part of a larger common plan of development. This program is intended to require that owners or operators of these sites will use a combination of structural and non-structural BMPs appropriate for the community, which protect water quality. The permit requirements that apply to Midland include:

- It is supported with an ordinance or regulatory mechanism to regulate such discharges.
- It includes recording enforcement actions and making them available to TCEQ.
- It ensures long-term maintenance of structural BMPs.
- The City ordinance requires a drainage and stormwater easement for all structural stormwater control practices. This easement includes language that requires any facility in a private easement to inspect and repair it at least annually, and to retain records or inspections.
- Midland has developed an inspection program to ensure maintenance of structural BMPs, and keeps records of inspections.
- Activities for the 2025-2029 permit term include review of stormwater quality requirements and expansion of the stormwater control inspection program.

MCM 6: Pollution Prevention and Good Housekeeping for Municipal Operations

The City shall develop and implement an operation and maintenance program with the goal of preventing or reducing pollutant runoff from municipal activities and municipally owned areas. In this program, the City is required to undertake activities in the following list:

Inventory, Mapping and Prioritization – the City of Midland has:

- Developed and maintained an inventory of facilities and stormwater controls owned by the MS4 in the regulated area. This includes all of the following at a minimum.
 - Composting Facilities
 - Equipment Storage and Maintenance Facilities
 - Fuel Storage Facilities
 - Hazardous Waste Disposal Facilities
 - Hazardous Waste Handling and Transfer Facilities
 - Incinerators
 - Landfills
 - Material Storage Yards
 - Pesticide Storage Facilities
 - Buildings
 - Parking lots
 - Golf Courses
 - Swimming Pools
 - Public Works Yards
 - Recycling Facilities
 - Salt Storage Facilities
 - Solid Waste Handling and Transfer Facilities
 - Street repair and Maintenance Sites
 - Vehicle Storage and Maintenance Yards
 - Structural Stormwater Controls
- Midland shows permittee-owned facilities on the MS4 GIS map. Currently, all structural stormwater controls are stormwater basins, public and private. The GIS information for these has been compiled and enhanced in prior permit terms.
- Midland will review each of these facilities once per permit term for their potential to discharge pollutants.
- Midland has identified a list of high priority facilities that have high potential to generate pollutants, including at least maintenance yards, hazardous waste facilities, fuel storage locations, and others where chemicals have high potential to be washed offsite.
- Midland documented this process in previous permit terms as facilities that also needed industrial stormwater permits. In this permit term, the City plans to evaluate whether other facilities should be designated high priority.

General Requirements that apply to Midland include:

- The City of Midland trains appropriate employees in pollution prevention and good housekeeping practices, and maintains a training attendance log.

- The City disposes of waste materials per state law.
- The City has a procedure for disposal of sweepings such that they will not reenter the MS4.

Operation and Maintenance Program – The City must:

- Assess City operations, including Street, Parking lot and Bridge Maintenance, Cold Weather Operations, and maintenance of Street and Channel ROW and Easements.
 - The City has identified pollutants of concern from these operations.
 - The City has developed and implemented a set of measures to reduce pollution from these operations.
- As a level 4 city, Midland is required to develop an O&M program for roads, public parking lot and public spaces, including street sweeping, or equivalent if feasible.
 - Midland has incorporated a schedule for sweeping into the SOPs for Street, Parking Lot and Bridge Maintenance.
- In areas without curbs, the City has O&M procedures within the SOPs for Street and Channel ROW and Easements. The City inspects any pollution control measures at City sites. During the 2025-2029 permit term, the City plans to enhance standard operating procedures for the inspections, including facility-specific inspection logs.
- Maintain any structural BMPs owned by the City at a frequency chosen by the City.
 - The City determined that current structural BMPs are certain stormwater basins.
 - The City developed standard operating procedures for stormwater basin maintenance.
- For operation and maintenance of storm sewer systems, Midland:
 - Developed and implemented standard operating procedures for the collection of pollutants in inlets and other surface drainage structures.
 - Developed a list of potential problem areas and prioritized them for more inspection.

Facility Good Housekeeping / Pollution Prevention Activities – The City has:

- Inspected high priority facilities
 - Documented inspection, deficiencies, and corrective actions.
 - Developed Standard Operating Procedures for each high priority facility. Keep on site and update as necessary.
 - Included in the SOP's good housekeeping such as sheltering potential pollutant from rain.
 - Fueling operations and vehicle maintenance areas have SOPs for spill prevention and control.
 - Implemented stormwater controls at all high priority facilities
 - De-icing and anti-icing material storage prevent any stormwater runoff from these materials.
 - Equipment and vehicle washing procedures at City facilities are addressed with SOPs. Washing outside without recapture is allowed under this permit.
- The City contractually obligates contractors working on both low and high priority City sites to comply with any pollution prevention and good housekeeping procedures also.
 - During the 2025-2029 permit term, the City will continue to enforce these procedures

to provide oversight of contractors to verify compliance.

These chemical regulations also apply to the City.

- Pesticide, herbicide, and fertilizer rules for the City of Midland:
 - The City has evaluated materials used on public spaces.
 - The City has a program to educate and to get appropriate permits for applicators and distributors.
 - The City uses non-chemical pest management where feasible.
 - The City has developed schedules for chemical application to minimize discharge.
 - The City ensures proper disposal of unused chemicals.
 - The City is required to provide recycling for household wastes at least 3 times annually.

For the 2019-2024 permit term, a new provision for level 4 cities was added, regarding flood control projects. The City is required to:

- Assess the impacts on receiving waters of all flood control projects.
- Design new flood control structures to provide erosion prevention and pollutant removal.
- To the maximum extent possible, retrofit existing structural flood control devices for additional pollutant removal.

The SWMP for the 2025-2029 permit term includes:

- Researching techniques for reducing erosion and removing pollutants that will be appropriate in Midland, both for new construction and retrofitting.
- Creating a list of standard provisions to be adopted for new construction.
- Listing existing flood control projects
- Evaluating these projects' effectiveness at preventing erosion and removing pollutants
- Creating a list of structures that can effectively be retrofitted.

MCM 7: Industrial Stormwater Sources

This MCM applies to level 4 cities such as Midland. It is directed at city-owned landfills; public or private treatment, storage, or disposal facilities for municipal waste, such as transfer stations and incinerators; hazardous waste treatment, storage, disposal and recovery facilities; and facilities subject to Emergency Planning and Community Right-to-Know Act Title III, Section 313. If other facilities are determined to contribute a substantial pollutant load, they will also be included.

During previous permit terms, the City followed the guidelines above to define a list of facilities that this requirement applies to. The City has a landfill which is not in the MS4 and has an industrial facility TPDES permit. The City has a Citizen's Collection Center where recycled materials and yard waste can be taken. This facility does not need a TPDES permit but was designated as high priority and inspected as part of MCM 5.

Thus, this MCM will only apply to private industrial facilities since the applicable City facilities are covered elsewhere.

The private industries identified include 5 facilities that store chemicals and are on the EPCRA Section 313 list, and two that handle municipal solid waste, identified by TCEQ central registry.

For facilities covered by MCM 7, the requirements are to:

- Identify and control pollutants in stormwater discharges to the MS4.
- The City has developed procedures for contacting private owners and making inspections.
- During the 2025-2029 permit term, the City will inspect all facilities on the list and update it annually.

MCM 8: Authorization for Construction Activities where the Small MS4 is the Site Operator

This MCM is optional. The City of Midland has not selected this MCM in the previous permit, nor is it being selected for the 2025-2029 permit.