PHASE II MS4
YEAR 6
ANNUAL REPORT
for
KENNEDALE, TEXAS

Stormwater Management Program
Year 6 (January 1, 2024– December 31, 2024)
Permit # TXR040006/TXR040830

Prepared for
Texas Commission of Environmental Quality

AVO 56591

2601 Meacham Blvd Suite 600
Fort Worth, TX 76137

March 28th, 2025
AVO 56591.001

Texas Commission on Environmental Quality
Stormwater Team Leader (MC-148)
P.O. Box 13087
Austin, Texas 78711-3087
512-239-4671

RE: Phase II (Small) MS4 Annual Report for City of Kennedale
TPDES Authorization: TXR040006/TXR040830

Dear TCEQ Stormwater & Pretreatment Team:

This letter serves to transmit the Annual Report for the City of Kennedale's Phase II MS4 Stormwater Management Program. This report documents the progress made during Year 6 (January 1 - December 31, 2024) as required by the Texas Pollutant Discharge Elimination System (TPDES) General Permit No. TXR040006/TXR040830.

The City of Kennedale is a Level 1, Traditional MS4 with a population less than 10,000. Please address all correspondence to Kristian Sugrim and Stephanie Griffin:

Kristian Sugrim
City of Kennedale
405 Municipal Drive
Kennedale, TX 76060
(817) 538-7375
ksugrim@cityofkennedale.com

Stephanie Griffin
Halff Associates, Inc.
2601 Meacham Blvd Suite 600
Fort Worth, TX 76137
(817) 813-5704
sgriffin@halff.com

Please feel free to contact us with any questions or comments.

Sincerely,

HALFF ASSOCIATES, INC.

Stephanie W. Griffin

Stephanie W Griffin, PE, CFM
Director of Water Resources

C: Alyssa Taylor
TCEQ Region 4 Director
2309 Gravel Dr
Fort Worth, TX 76118-6951
817-588-5800

March 28th, 2025
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TCEQ Region 4 Dallas/Fort Worth
Stormwater Team Leader
2309 Gravel Dr
Fort Worth, TX 76118-6951
817-588-5800

RE: Phase II (Small) MS4 Annual Report for City of Kennedale
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Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number TXR040000

A. General Information

Authorization Number: TXR040006 / TXR040830

Reporting Year (year will be either 1, 2, 3, 4, or 5): 6 (with 2019-2023 goals)

Annual Reporting Year Option Selected by MS4:

Calendar Year: 2024

Permit Year: n/a

Fiscal Year: n/a Last day of fiscal year (MM/DD): n/a

Reporting period beginning date: (MM/DD/YYYY) 01/01/2024

Reporting period end date (MM/DD/YYYY) 12/31/2024

MS4 Operator Level: 1 Name of MS4 Permittee: City of Kennedale

Contact Name: Kristian Sugrim Telephone Number: 817-538-7375

Mailing Address: 405 Municipal Drive, Kennedale, TX 76060

E-mail Address: ksugrim@cityofkennedale.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: 4

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. (2019-20 SWMP)	X		Most BMPs have been met or progress has been made towards meeting the SWMP goals.
Permittee is currently in compliance with recordkeeping and reporting requirements.	X		Report is being submitted for Year 6.

Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.)	X		The permittee meets the eligibility requirements.
Permittee conducts annual review of SWMP in conjunction with the preparation of the annual report as required in Part II E.4.	X		The permittee reviewed the SWMP, and changes will be made to the new SWMP in the next permit renewal.

2. Provide a general assessment of the appropriateness of the selected BMPs. You may use the table below to meet this requirement

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No, and explain.)
1.1	Fats, Oils, and Grease (FOG) Education	Yes, effective education on the proper disposal of FOGS can influence behavior changes. Providing clear guidance on steps and specific actions that they can take will reduce the potential for discharge of pollutants in stormwater.
1.2	Household Hazardous Waste (HHW) Program	Yes, an effective HHW program reduces improper disposal of hazardous waste which will reduce the amount of pollutants in the stormwater.
1.3	Municipal Employee Training Program	Yes, training staff on pollution prevention for stormwater creates a better understanding of the need for good housekeeping practices and the importance of protecting the City's stormwater resources leading to reduction in pollutants.
1.4	Pet Waste Management	Yes, pet waste bag stations may encourage residents to clean up after their pets, which can effectively reduce the discharge of pet waste in stormwater, especially in concentrated areas like parks.
1.5	Recycling Program	Yes, inviting residents and businesses to participate in recycling and providing drop-off locations for public use reduces recyclable items from entering drainageways.

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No, and explain.)
1.6	Regional Cooperative Partnerships	Yes, the City participates in North Central Texas Council of Governments (NCTCOG) regional stormwater program to develop educational materials, training, outreach, and other resources for participating MS4 communities which can cause changes that can lead to reduced pollutants.
1.7	Storm Drain Inlet Marking	Yes, the storm drain inlet markers educate the public about the importance of keeping our drainage system free of trash and illicit discharge which leads to reduction in pollutants.
1.8	Public Education and City Stormwater Management Program (SWMP)	No, public education does not directly reduce the discharge of pollutants, however, educating the public on stormwater provides the City with the opportunity to educate the community on the SWMP and encourage constituents to implement similar strategies on their properties.
1.9	Water Conservation Practices for Homeowners	Yes, the public education campaign for water conservation has resulted in less runoff flowing into the streets by homeowners which reduces the pollutants entering the stormwater system.
2.1	Storm Drainage System Map	Yes, the City's storm drain system map is used to track reported discharges and determine target areas in need of education and/or enforcement which helps the City be more aware of their storm drain system and reduce the pollutants in stormwater.
2.2	Education and Training on Illicit Discharges	Yes, training staff on illicit discharges provides improved identification of these circumstances may contribute to behavioral change and in turn help reduce pollutants in stormwater.
2.3	Public Reporting and Response Procedures	Yes, providing avenues for the public to report stormwater runoff, illicit discharges and illegal dumping aids City staff in identifying and addressing these issues to decrease pollutants in stormwater.
2.4	Source Investigation and Elimination	Yes, investigating and eliminating illicit discharges effectively removes pollutants.

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No, and explain.)
2.5	Detection and Elimination of Illicit Sanitary Sewer Discharges	Yes, addressing maintenance and rehabilitation of sanitary sewer infrastructure prevents pollutants from entering the stormwater and reduces illicit discharges.
3.1	Erosion and Sediment Control Requirements	Yes, the erosion and sediment control ordinance gives the City authority to review and provide enforcement of adopted policies and will help control pollution in stormwater.
3.2	Construction Plan Review Procedures	Yes, the City uses in-house staff and an outside consultant to assist in the review of construction site runoff controls during the plan submittal reviews which will help reduce pollutants by keeping construction sites in check.
3.3	Construction Site Inspection and Enforcement	Yes, the City provides inspections to ensure that construction runoff controls are effective and maintained for identifying and removing pollutants which will help reduce potential stormwater pollution from occurring at construction sites.
3.4	Construction Stormwater Training	Yes, training City inspectors on procedures specific to BMP runoff inspections maintains consistent enforcement of the program to reduce stormwater pollution potential from construction site runoff.
3.5	Construction Site Stormwater Education	Yes, stormwater education for contractors and homebuilders at preconstruction meetings and with the building permit effectively teaches people responsible for installing and maintaining construction site erosion controls.
4.1	Post-Construction Ordinance	Yes, the post-construction ordinance regulates and minimizes stormwater runoff from development or redevelopment activities resulting in reduced pollutants in the stormwater
4.2	Long-Term Maintenance of Post-Construction BMPs	Yes, long-term operation and maintenance of post-construction BMPs ensures that the structures operate as designed and reduce pollutants from being released downstream.

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No, and explain.)
4.3	Detention Pond Ordinance	Yes, the detention pond ordinance requires property owners to maintain permanent detention facilities which will lead to reduced pollutants in the stormwater.
5.1	Facility and Stormwater Control Inventory	No, facility and stormwater control inventory does not directly reduce discharge of pollutants. However, maintaining a list of City-owned and operated facilities and stormwater controls helps City staff to locate sources of potential pollutants when reported by the public.
5.2	Municipal Employee Training Program	Yes, training staff on pollution prevention for stormwater provides a better understanding of the need for good housekeeping practices and the importance of protecting the City's stormwater resources.
5.3	Contractor Requirements and Oversight	Yes, training City-hired contractors and subcontractors ensures consistency of the stormwater program applications for City-owned facilities and will contribute to reduced pollutants in the stormwater.
5.4	Municipal Operation and Maintenance Activities	Yes, the City is leading by example by implementing pollution prevention and inspections measures for municipal O&M activities, such as road maintenance, cold weather operations and herbicide/pesticide applications. These implemented pollution preventions and inspection measures will decrease the pollutants in the stormwater.

3. Describe progress towards achieving the goal of reducing the discharge of pollutants to the maximum extent practicable (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:

MCM	BMP	Information Used	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
1.1	BMP 1. Fats, Oils, and Grease (FOG) Education	FOG and NCTCOG	1 1 300 250 1 Amount unknown 2	Web page Fog event newsletter article advertisement FOG Education handouts at event FOG information copies at City Hall FOG Brochure FOG Brochure handed out References	No. Website information, newsletter articles, FOG website references, and educational handouts do not directly reduce pollutants. However, public education reduces improper FOG disposal by influencing behavioral changes.

MCM	BMP	Information Used	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
1.2	BMP 2. Household Hazardous Waste (HHW) Program	HHW brochure and Tarrant County Environmental Collection Center Program	1 1 3 24	City website with HHW information Website HHW reference link TCECCP vouchers Vacuum truck tickets	Yes. The City issues vouchers for hazardous waste disposal to residents to take to the Tarrant County Environmental Collection Center Program (TCECCP) in Fort Worth for appropriate disposal. The City had 3 vouchers received from Kennedale residents by TCECCP. The vacuum truck directly removes grease from businesses resulting in reduction of pollutants. There were 24 vacuum truck tickets in 2024. Brochures, website information, and educational HHW information do not directly reduce pollutants. However, public education reduces improper HHW disposal.

MCM	BMP	Information Used	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
1.3	BMP 3. Municipal Employee Training Program	NCTCOG training material	6 4	Number of employees attended NCTCOG training Posters in City shop	No. Training does not directly reduce pollutants. Educating staff on proper disposal of materials improves understanding of pollution prevention. City staff attended Stormwater Pollution Prevention Practices training at NCTCOG.
1.4	BMP 4. Pet Waste Management	Pet waste bags	2,100 1 1 1	Bags used from inventory Web page Pet Waste Station Map Invoice for Pet Waste Bags	Yes. Pet waste bags, if disposed of properly, prevent pet waste from entering streams and directly reduce pollutants. The information on the website does not directly reduce pollutants but does educate the public about proper disposal of pet waste to encourage behavioral change.

MCM	BMP	Information Used	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
1.5	BMP 5. Recycling Program	Bring-It! recycling event 2024 Adopt-A-Spot / Fall Sweep clean up events	82 1,620 lbs 250 lbs 550 lbs 18,807 45,806 729,813 12,088	Electronics Paper Batteries Scrap Metal Number of Volunteers Volunteer Hours Pounds of trash and recycling collected Tires collected	Yes. The Crud Cruiser is part of the Keep Kennedale Beautiful program. The Bring-It! event was held in September 2024. Adopt-A-Spot, Keep Kennedale Beautiful, and Fall Sweep events were held in April and November 2024. Residents were also encouraged to take recycling items to First UMC. These events directly reduce pollutants being improperly disposed in streams.
1.6	BMP 6. Regional Cooperative Partnerships	Regional partnerships	1	Fund annual NCTCOG stormwater program	No. Funding and participating in annual regional programs does not directly reduce pollutants. However, maintaining regional partnerships and working towards a common goal of improved water quality does reduce pollutants long-term.

MCM	BMP	Information Used	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
1.7	BMP 7. Storm Drain inlet Marking	Storm drain markers	20 1 21	Markers Added Photo of Marker Storm Drains Inspected	Yes. Placing storm drain markers causes the public to think about what they are about to wash down the storm drain and will reduce the amount of pollutants in the storm drains. The City has marked 20 storm drain inlets in 2024.
1.8	BMP 8. Public Education and City Stormwater Management Program	City and regional educational material	1	Web page	No. The information on the City's stormwater website and water education materials do not directly reduce pollutants but do educate the public about the importance of stormwater quality.
1.9	BMP 9. Water Conservation Practices for Homeowners	City and regional material	1 12	Web page Educational Conservation Links	No. The information on the City's website and water education materials do not directly reduce pollutants but do educate the public about water conservation measures that impact stormwater quality.

MCM	BMP	Information Used	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
2.1	BMP 1. Storm Drainage System Map	Annual map update	0	Inlets added to map	No. A map of storm drain locations does not directly reduce pollutants. A map of the storm drain inlets allows City staff to identify potential points of discharge when responding to reported concerns. The City is working on updating their stormdrain map in 2025.
2.2	BMP 2. Education and Training on Illicit Discharges	NCTCOG training materials	6 4	Number of employees that attended NCTCOG training Training Posters	No. Training does not directly reduce pollutants. Educating staff on proper disposal of materials improves understanding of illicit discharges. City staff attended Stormwater Pollution Prevention Practices training at NCTCOG.

MCM	BMP	Information Used	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
2.3	BMP 3. Public Reporting and Response Procedures	Public concerns	1	Concerns reported by email	Yes. Public reports of illicit discharges can have a direct impact on reducing pollutants. The City maintains a phone number and website link for the public to report concerns. In 2024, one concern associated with flooding issues and storm drains in need of cleaning were reported to the City. Staff responded to these reports and determined that they were not illicit discharges. Staff proactively looks for and corrects inlet issues during storm events, which directly reduces pollutants in stormwater.

MCM	BMP	Information Used	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
2.4	BMP 4. Source Investigation and Elimination	Site visits	0 0	Concerns reported Site visits to investigate	Yes. Site visits to investigate potential illicit discharges directly reduce pollutants. No concerns were reported in 2024, so no visits were warranted. Procedures for responding to illicit discharges including inspections, investigations and corrective actions need to be written. No changes were needed for the contacts of neighboring MS4 operators. The City also sprays their drainage sites to control vegetation to reduce debris and pollutants.

MCM	BMP	Information Used	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
2.5	BMP 5. Detection and Elimination of Illicit Sanitary Sewer Discharges	Coordination with sanitary sewer lines	388	Linear Feet of sanitary sewer replaced	Yes. Replacing sanitary sewer lines that no longer work properly reduces pollutants in the stormwater system. The City of Arlington Water and Wastewater oversees sanitary sewer projects. In 2024, 388 linear feet of sanitary sewer was replaced.
3.1	BMP 1. Erosion and Sediment Control Requirements	UDC Article 17	0 0	UDC Revisions Enforcement actions taken	No. An ordinance in and of itself does not reduce stormwater pollutants. UDC Article 17 provides for the implementation and enforcement of erosion and sediment controls. No changes have been made to the ordinance since 2017. No enforcement actions were taken in 2024.

MCM	BMP	Information Used	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
3.2	BMP 2. Construction Plan Review Procedures	Plans	1,113	Building permit issued	No. Permit reviews and meetings with developers/contractors do not directly reduce pollutants. However, these interactions provide City staff the opportunity to educate developers/contractors on the City's requirements to protect stormwater quality. A total of 1,113 building permits were issued.
3.3	BMP 3. Construction Site Inspection and Enforcement	Construction	2 2 0	Projects Inspections Enforcement actions	Yes. Site inspections allow for corrections to be made in a timely manner to reduce pollutants from entering into the stormwater system. There were 2 current projects in 2024. There were also 2 inspections performed. No enforcement actions were required in 2024.

MCM	BMP	Information Used	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
3.4	BMP 4. Construction Stormwater Training	NCTCOG material	6	Number of employees that attended NCTCOG training	No. Training does not directly reduce pollutants. Educating staff on proper disposal of materials associated with construction sites improves understanding of the effects of the pollutants. City staff attended Stormwater Pollution Prevention Practices training at NCTCOG.
3.5	BMP 5. Construction Site Stormwater Education	Site erosion control	Amount unknown	Brochures handed out in development packet	No. Construction site erosion control brochures do not directly reduce pollutants. However, providing this information to contractors educates them on the City's requirements to protect stormwater quality. The City's site erosion control brochure was distributed in the development packet to contractors, but this amount was not tracked.

MCM	BMP	Information Used	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
4.1	BMP 1. Post-Construction Ordinance	UDC Article 18	0	Enforcement Actions	Yes. Enforcing the City's post-construction ordinance reduces the stormwater pollutants. No enforcement actions were required in 2024.
4.2	BMP 2. Long-Term Maintenance of Post-Construction BMPs	Requirements for Long-Term Maintenance	1	Maintenance Plans	Yes. Maintaining post-construction BMPs improves the longevity and effectiveness of stormwater structures.
4.3	BMP 3. Detention Pond Ordinance	UDC Article 18	0	Enforcement Actions	Yes. Enforcing the City's post-construction ordinance reduces the stormwater pollutants. No enforcement actions were required in 2024.

MCM	BMP	Information Used	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
5.1	BMP 1. Facility and Stormwater Control Inventory	List of City-owned and operated facilities and stormwater controls	1	Facility List	No. Maintaining a list of City-owned and operated facilities and stormwater controls does not directly reduce discharge of pollutants. However, the inventory list helps City staff locate potential pollutants reported by the public. There is one stormwater facility at Sonora Park that the City visually checks biweekly.
5.2	BMP 2. Municipal Employee Training Program	NCTCOG material	6	Number of employees that attended NCTCOG training	No. Training does not directly reduce pollutants. Educating staff on good housekeeping practices improves understanding of the importance of protecting the City's stormwater system. City staff attended Stormwater Pollution Prevention Practices training at NCTCOG.

MCM	BMP	Information Used	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
5.3	BMP 3. Contractor Requirements and Oversight	Site Visits	2	Site Inspections	Yes. Performing site inspections ensures that contractors are maintaining control measures and standard operating procedures (SOPs). There were 2 commercial site inspections performed in 2024.
5.4	BMP 4. Municipal Operation and Maintenance Activities	Site Visits	2	Site Inspections	Yes. Performing site inspections ensures that illicit discharge from road maintenance, cold weather operations, and herbicide/pesticide applications are being handles in accordance with the City's operations and maintenance procedures. There were 2 municipal site inspections performed in 2024.

4. Provide the measurable goals for each of the MCMs, and an evaluation of the success of the implementation of the measurable goals:

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved
1.1	Provide at least one link each year to FOG educational material on the City website. Provide at least one FOG educational article each year in the City newsletter. Make educational handouts available at City Hall.	Met goal. The City has multiple reference links that include FOG educational material posted on the City's FOG website. In addition, 300 FOG event flyers were printed in 2024 and handed out at the trunk or treat event. The City also put 250 copies of the FOG educational handout at City Hall. The City also posted their FOG event advertisement in their newsletter and on the City Facebook in 2024.
1.2	Conduct one household hazardous waste collection center collection program once per year using the Fort Worth Environment Collection Center. Update existing educational HHW brochure as needed and track the number of brochures distributed annually at City Hall and with water utility bills.	Met goal. The City renewed their contracts with the Tarrant County Environmental Collection Center Program (TCECCP) that allow Kennedale residents to dispose of HHW free of charge. HHW public education documents are reviewed annually and no changes were made to the documents. These educational documents about the program are provided on the City's website as well as additional references for HHW. A City flyer regarding the HHW program and the TCECCP is available on the website and at City Hall. The HHW materials were distributed at City Hall but it was untracked, therefore amount was unknown. The City had 3 vouchers received from Kennedale residents by TCECCP in 2024. There were also 24 vacuum truck tickets in 2024. The City also hosted their Bring It! event in September 2024 where residents disposed of HHW.
1.3	Conduct employee education during regularly scheduled meetings at least once per year. Train staff on	Met goal. Educational materials on fleet maintenance are posted in the shop and reviewed with employees during regular meetings to reinforce proper auto maintenance practices that minimize stormwater pollution. Training covers topics such as fueling, parts cleaning, leak prevention, vehicle washing, and

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved
	stormwater topics at least once per year. Train employees to update MS4 data collection with digital data tracking.	waste disposal. Additionally, City staff attended Stormwater Pollution Prevention Practices training at NCTCOG to further enhance their understanding of stormwater management.
1.4	Establish a Pet Waste Management Program in order to reduce the number of bacteria entering local streams and creeks via pet waste. Provide at least two links per year to educational articles on proper pet waste disposal online; Continue to provide pet waste bag stations at City parks.	Met goal. The City's website includes residential stormwater tips on proper pet waste disposal and 2 links for the public to reference. 2,100 pet waste bags were used in 2024. The five pet waste bag stations are available in City parks. The City provides pet waste educational links online for the public to reference on their website.
1.5	Invite at least 50% of residents and businesses per year to participate in the City's recycling program. Educate the public about benefits of recycling and advertise the program on the website. Provide brochures on recycling services at City Hall. Track public use of recycling drop-off center.	Met goal. The City website has recycling educational information for residents and businesses. The website provides education on the environmental benefits of recycling, as well as advertising upcoming City-wide recycling opportunities. Bring It!, Fall Sweep and Adopt-A-Spot recycling and clean up events were held in 2024. These events were advertised to 100% of residents and businesses to participate in. The amount recycled and cleaned were also tracked at these events. Residents were also encouraged to take recycling items to First UMC. The City also encourages residents and businesses to utilize the Tarrant County Environmental Collection Center.

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved
1.6	City staff to attend at least one annual meeting of the Village Creek-Lake Arlington Watershed Protection Partnership to address issues associated with water quality impairments for bacteria in Village Creek and Lake Arlington. Continue annual funding of NCTCOG stormwater program to produce/update stormwater management educational materials.	Met goal. The Village Creek-Lake Arlington Watershed Protection has not met since 2018. The City participates in NCTCOG's regional stormwater program and has paid its annual dues for 2024.
1.7	Invite two volunteer groups to participate in a storm drain inlet marking program throughout the City each year. Mark 100% of new inlets as installed each year. Annually inspect 10 storm drain inlets and check for/replace any missing markers.	Met goal. The City has installed 20 new inlets and all 20 storm drains were marked in 2024. The City inspected 21 storm drains in 2024. No storm drain markers were reported to be missing or need replacing in 2024. The City invites and welcomes any volunteer groups to participate in inlet marking but the added inlet markers in 2024 were added by the City.
1.8	Review the City Stormwater (SW) Education Page web page at least once per year. Add one or more program updates and or articles on stormwater quality tips geared towards home and business owners.	Partially met goal. The City maintains and reviews annually their stormwater educational web page on the City website under the Public Works Department. The City provides education articles about stormwater quality tips geared towards home and business owners. The City also has their SWMP and annual reports posted on their webpage. The City was not able to advertise their SW educational page in their newsletter.

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved
	At least once per year advertise the SW educational page in the City newsletter.	
1.9	Post one or more educational articles per year via the City website that promote water conservation and reduced water waste from excessive lawn watering, particularly in drought periods. Track reduction in water usage when restrictions are in place.	Met goal. The City website contains information on water conservation, including links to additional information developed by partner entities and educational articles that promote water conservation such as "Water is Awesome". No water restrictions were implemented in 2024, so reduction was not tracked.
2.1	Document once per year 100% of the number and type of storm drainpipes and outfalls added to the map. Map locations with the highest concentration of reported discharges to identify areas for future corrective action.	Partially met goal. The City maintains a storm drain system map that was previously updated in 2020. The City is in the process of updating their stormdrain map which should be complete in 2025.
2.2	Once per year identify and share with City stormwater staff one or more new training articles about illicit discharge detection and elimination.	Met goal. Educational material targeting materials storage and spill cleanup, parks and grounds maintenance, and solid waste operations is posted in the shop to educate employees. City staff attended Stormwater Pollution Prevention Practices training at NCTCOG.

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved
2.3	Document communication received from public through public reporting/phone number and information in the online form on the City's website. Use the City's work order system to document comments from the public and document follow up actions to address illicit discharges taken by the City.	Met goal. The Public Works Department receives public reports of potential illicit discharges and public input regarding potential stormwater issues. A reporting/input phone number is provided on the City website under "Report A Problem". In 2024, one concern was reported through email that was associated with flooding issues and cleaning out storm drains. Staff responded to these reports, but they were not illicit discharges. Staff proactively look for and correct inlet issues during storm events. Onsite procedures for responding to illicit discharges and spills need to be written.
2.4	Conduct annually 10 or more dry weather inspections of outfalls and conveyances systems. Perform inspections in response to 100% of complaints or reports of illicit discharges. Notify the responsible MS4 or the TCEQ regarding 100% of discharges whose source is outside the City's jurisdiction.	Partially met goal. The City utilized the Compilation of Selected Standard Operating Procedures – A Resource for Stormwater Phase II Communities in North Central Texas. The procedure on page 18 for spill cleanup is utilized for cleanup of illicit discharges. No illicit discharges were identified in 2024, so no reports are available. The City also sprayed their drainage sites to control vegetation to reduce debris and pollutants in 2024. The City performed dry weather outfall inspections but did not track these. The City will track the amount of inspections conducted in 2025.
2.5	Perform and document sewer inspection, cleaning, and rehabilitation of 2,000 LF of sanitary sewer each year.	Met goal. The City of Arlington oversees sanitary sewer projects for Kennedale and 388 linear feet of sanitary sewer was replaced in 2024. Kennedale works in coordination with Arlington on the cleaning and inspections of sanitary sewers.
3.1	Inspect 100% of active construction sites.	Met goal. The City continues to enforce the ordinance. No enforcement actions were required in 2024. The City inspected 2 construction sites

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved
	Enforce the erosion and sediment control ordinance for 100% of active construction sites.	which was 100% of active construction sites in 2024.
3.2	Provide Building Permit Packets to 100% of contractors for new construction projects each year. Inspect 100% of projects larger than one (1) acre for which Contractors are required to submit a SWPPP to the City and ensure construction site has developed a stormwater pollution prevention plan in accordance with the TPDES Construction General Permit TXR150000.	Met goal. The Construction Plans review process includes verifying that grading plans, erosion and sediment control plans, details, and BMPs are included in the plan set and that they meet the minimum criteria for inlet protection, silt fence (or approved equal), sedimentation basins if the drainage area is larger than 10 acres, and construction entrance location. Accepted erosion control plans and SWPPPs are also required before the developer can obtain a grading permit. The City provided building permit packets to 100% of contractors for new construction projects each year. In 2024, a total of 1,113 building permits were issued by the City. The City inspected 2 construction sites and 100% of projects larger than one acre for which Contractors are required to submit a SWPPP to the City and ensure construction site has developed a stormwater pollution prevention plan.
3.3	Conduct the inspection and enforcement program for 100% of construction sites.	Met goal. The City continues to administer and enforce the construction site inspection program. The City conducted 100% of construction site inspections which included two inspections of commercial properties during 2024.
3.4	Conduct one or more trainings per year for personnel responsible for implementing the various aspects of the construction stormwater program.	Met goal. City staff attended Stormwater Pollution Prevention Practices training at NCTCOG.
3.5	Include site erosion control pamphlet in the preconstruction/building permit packages	Met goal. The City provides a checklist and a site erosion control brochure in building permit packets for contractors, developers, and builders to educate them about the requirements for

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved
	provided to contractors and home builders. Make an educational handout on erosion control available at the Public Works/Permitting offices. Educate two or more groups of construction professionals annually on the City's construction site stormwater erosion control and waste management guidelines.	proper erosion and pollution controls at construction sites. The information is discussed during preconstruction meetings, as well as the importance of stormwater standards - iSWM. The program continues to be successful at helping to prevent discharges of polluted storm water from construction sites. The City also educated two groups of construction professionals on the City's construction site stormwater erosion control and waste management guidelines in 2024 for the 2 construction projects that took place.
4.1	Continue to review proposed BMPs for new development during the plan review process. Enforce the existing post-construction ordinance for 80% of post-construction sites.	Met goal. The City continues to administer the existing post-construction runoff ordinance. In 2024, no enforcement actions were necessary. NCTCOG did not make any changes to the post-construction BMPs in 2024, so no ordinance updates were required.
4.2	Enforce the requirement for filing maintenance plans with real property records for at least 50% of post-construction sites. Maintain a database of enforcement actions taken to ensure proper maintenance of post-construction BMPs. Continue to enforce the City's post-construction ordinance.	Met goal. No maintenance plans were filed with the real property records in 2024. The City maintains records of enforcement actions taken and no enforcement actions were taking in 2024.
4.3	Review the existing ordinance in Year 2 and	Met goal. The City continues to administer the existing detention pond ordinance and reviews it

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved
	make any necessary updates during the permit term. Schedule and perform inspections of at least 50% of the existing Detention Ponds. Maintain a database of enforcement actions taken to ensure proper maintenance. Review existing ordinance and propose modifications if necessary	annually. No revisions were made to the ordinance, and no enforcement actions were required in 2024. The staff maintains records of enforcement actions, but none were added in 2024. No detention ponds were noted in 2024, so no inspections were scheduled or performed.
5.1	Conduct inspection of 80% of City owned stormwater facilities in each year of the permit. Update inventory for 100% of new installations.	Met goal. Sonora Park is the only City owned stormwater facility in Kennedale. Sonora Park's stormwater facility was visually inspected biweekly in 2024. No new installations were added so no update was needed to inventory.
5.2	Conduct one or more scheduled training per year for 80% of municipal employees for whom training is required.	Met goal. 100% of City staff (6 employees) that are required to be trained annually attended Stormwater Pollution Prevention Practices training at NCTCOG.
5.3	Prepare and update once per year a list of all City-hired contractors who are subject to the stormwater pollution prevention and good housekeeping requirements of this program.	Partially met goal. The City currently contracts with different engineering companies, construction companies and maintenance subcontractors that can change throughout the year. The City's standard contract requires these contractors and subcontractors to adhere to the SWPPP stormwater requirements. The City conducted two commercial site inspections in 2024.

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved
	Perform at least two field checks per year of contractor activities and confirm that contractors are using appropriate control measures and standard operating procedures (SOPs). Update list of City-hired contractors who are subject to the stormwater pollution prevention and good housekeeping requirements.	
5.4	Implement at least three identified pollution prevention measures per year. Conduct two or more site inspections per year.	Partially met goal. The City uses contractors for landscaping, including herbicides, pesticides and fertilizers. The City vehicles are maintained by a private vehicle service facility located offsite. The City will develop written O&M procedures and inspection frequencies for asphalt/concrete field work. The fire station no longer uses the fuel tanks at the fuel center and is planning to remove them.

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.?

To assess the success of the SWMP at reducing the discharge of pollutants to the MEP, the Kennedale MS4 program engaged in the following activities in 2024:

- Continued to monitor and track public reports of stormwater issues. There was one storm water related drainage report that was reported in 2024. It was not found to be an illicit discharge.

- Continued to maintain sanitary sewer infrastructure through the City's contract with Arlington to minimize overflows and discharge of pollutants to the MEP. The City replaced 388 linear feet of sanitary sewer in 2024.
- Continued to respond to all concerns for illicit discharges and dumping. None were reported in 2024.
- Continued to monitor erosion and sediment control plans for active construction projects and post-construction BMP maintenance activities.
- Continued to implement spill cleanup procedures at municipal facilities. None were needed in 2024.

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.

   No new impaired waters were added to the 303(d) list since the list was updated in 2024. The City of Kennedale discharges to Village Creek, Segment 0828A, which has been updated to impairment category 5r and has an impairment for bacteria. Lower West Fork Trinity River, Segment 0841_02, which has an updated impairment category of 5c and impairments of dioxin and PCBs in edible tissue. The 2024 Texas 303(d) list does not include any additional impairments within the Kennedale area. The City is aware of the impairments and participates in the regional stormwater efforts to address said impairments.

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.

   The City continues to support the NCTCOG Regional Stormwater Program and takes specific measures to reduce bacteria in the watershed by maintaining and repairing sanitary sewer systems, reducing illicit discharges, reducing dumping of debris, controlling animal sources and educating the public. The City does not have a water sampling program. These activities are described further in the following sections.

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

   The City of Kennedale discharges to two impaired waters with TMDLs: Section 0841 Lower West Fork Trinity River and Section 0841M Kee Branch. The 303(d) List shows an impairment for bacteria, dioxin, and PCBs. Legacy pollutants are being addressed by a ban on discharge with "no permittable load" allocation. Bacteria is a concern within both the Kee Branch and Lower West Fork Trinity Watershed and the following targeted controls are being implemented by the City.

- Sanitary Sewer Systems - The City continues to improve and update sanitary sewer infrastructure through its contract with Arlington to reduce overflows and address aging systems.
- On-site sewage facilities - The City is dedicated to the provision of discharging safe stormwater runoff that meets or exceeds all state water quality regulations. The majority of Kennedale's wastewater (sanitary sewer) flows through the City of Arlington's wastewater collection system to the Trinity River Authority wastewater treatment plant in Irving. Some wastewater on the north side of Kennedale flows to Fort Worth's Village Creek Water Treatment Facility. Kennedale continues to provide alternatives to on-site sewage facilities.
- Illicit Discharge and Dumping – The City continues to target outreach and education efforts to encourage reporting of any illegal dumping or discharges to the system.
- Animal Sources – The City continues to promote and provide pet waste disposal programs to reduce the amount of pollutant contributions from pet waste, especially at City parks.
- Residential Education - The City of Kennedale is a small percentage of the overall watershed of these impaired streams. The City continues to contribute funds to support regional education and training efforts by the North Central Texas Council of Governments (NCTCOG). Kennedale also provides educational outreach material, including the City website, various brochures, pet waste management program and storm drain inlet markers.

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	126 MPN/100 mL	The City continues to address concerns regarding illicit discharges and dumping to reduce pollutants in stormwater runoff.	8

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	Regional Cooperative Program	NCTCOG has an active stormwater outreach and training program that will educate people and lead to reduced bacteria impairment of the Lower West Fork Trinity River.
Bacteria	Storm Drainage System Map	The storm drain system map shows the potential areas that may be impacted by illicit discharges.
Bacteria	Detection and Elimination of Illicit Sanitary Sewer Discharges	Site inspections are critical to addressing reported and/or discovered illicit discharges in a timely manner.
Bacteria	Pet Waste Education and Disposal	City provides pet waste bags at no charge in City parks to reduce bacteria from entering the stormwater system.

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

Description of Bacteria-Focused BMP	Comments/Discussion
Detection and Elimination of Sanitary Sewer Discharges	The City maintains and rehabilitates sanitary sewer infrastructure to reduce discharges.
Regional Cooperative Partnerships	The City participates in one regional partnership that focuses on bacteria reducing BMPs: NCTCOG Stormwater Program.
Public Reporting/Input Program	The City responds to reports received associated with potential illicit discharge and dumping activities.

Description of Bacteria-Focused BMP	Comments/Discussion
Pet Waste Management	The City's pet waste management program includes education information and distribution of pet waste bags in City parks.
Stormwater Education	The City maintains its website with stormwater education materials, including current BMP information, FOGs and pet waste.

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;
   - decrease in number of illegal dumping;
   - increase in illegal dumping reporting;
   - number of educational opportunities conducted;
   - reductions in sanitary sewer flows (SSOs); and/or
   - increase in illegal discharge detection through dry screening.

Benchmark Indicator	Description/Comments
Pet Waste Disposal	The pet waste disposal bags are being used by park visitors in City parks.
Sanitary Sewer projects	The City of Arlington performed 388 linear feet of sanitary sewer improvements in the City of Kennedale in 2024.
Regional Cooperative Partnerships	The City continues to participate in the NCTCOG stormwater program. The City uses the NCTCOG stormwater training materials.
Stormwater Education	The City provides educational information on its website, along with brochures, newsletter articles and with the City-wide collection events.

E. Stormwater Activities

Describe activities planned for the next reporting year: The City has submitted its NOI/SWMP through the NeT-MS4 platform and updated its SWMP for 2024-2029 to comply with the permit issued by TCEQ in August 2024. Until TCEQ approves the new SWMP, the City will continue implementing its existing SWMP for 2025. Activities may change for 2025 based on when TCEQ approves the City's NOI/SWMP submittal.

MCM(s)	BMP	Stormwater Activity	Description/Comments
1.1	Fats Oils and Grease (FOG) Education	Public Education and Outreach	Provide link to FOG in City website. Provide 1 article in newsletter per year.
1.2	Household Hazardous Waste (HHW) Program	Public Education and Outreach	Provide the brochure at City Hall and annually distribute education to the public through website, newsletters or brochures.
1.3	Municipal Employee Training Program	Public Education and Outreach	Train City staff on good housekeeping practices. Develop and distribute educational material targeting auto maintenance businesses.
1.4	Pet Waste Management	Public Education and Outreach	Provide educational material on the website. Provide pet waste bags at City parks. Track bags purchased.
1.5	Recycling Program	Public Education and Outreach	Encourage residents and businesses to participate in the existing recycling programs. Advertise the program on the City's website and newsletter. Track public use of the recycling drop-off center.
1.6	Regional Cooperative Partnership	Public Education and Outreach	Continue to provide annual funding for the NCTCOG stormwater programs. Attend an NCTCOG meeting. Participate in the Village Creek-Lake Arlington Watershed Protection Partnership.
1.7	Storm Drain Inlet Marking	Public Education and Outreach	Inspect storm drains and replace missing storm drain markers. Maintain supply of inlet markers. Invite the public to assist in the addition of storm drain markers to new inlets that get installed.

MCM(s)	BMP	Stormwater Activity	Description/Comments
1.8	Stormwater Education	Public Education and Outreach	Provide stormwater education information on City website. Consider updates to the stormwater public education web page. Advertise the web page in a City newsletter article.
1.9	Water Conservation Practices for Homeowners	Public Education and Outreach	Provide water conservation education information on the City website.
2.1	Storm Drainage System Map	Illicit Discharge Detection and Elimination	Continue to update the storm drainage system map using record drawings submitted for any new development or redevelopment projects from the previous year.
2.2	Education and Training on Illicit Discharges	Illicit Discharge Detection and Elimination	Train City staff and document attendees and training materials.
2.3	Public Reporting/Input Program	Illicit Discharge Detection and Elimination	Post the public reporting/input phone number and information on the City website with a central point of contact. Document any reports received and any corrective actions taken. Prepare written procedures for responding to illicit discharges and spills. Implement on-site procedures for responding to illicit discharges and spills.

MCM(s)	BMP	Stormwater Activity	Description/Comments
2.4	Source Investigation and Elimination	Illicit Discharge Detection and Elimination	Implement the illicit discharge source investigation and elimination procedures. Document all reports received and responses. Document the use of the roto-cleaner in the storm drains. Develop written procedures for responding to illicit discharges including inspections, investigations and corrective actions need to be written.
2.5	Detection and Elimination of Illicit Sanitary Sewer Discharges	Illicit Discharge Detection and Elimination	Evaluate budget and, if feasible, perform sanitary sewer line maintenance, rehabilitations and replacement projects as needed. Track locations and/or design of completed projects if budget allows. Work with City of Arlington who oversees sanitary sewer projects.
3.1	Erosion and Sediment Control Requirements	Construction Site Runoff Controls	Enforce the construction erosion and sediment control ordinance.
3.2	Construction Plan Review Procedures	Construction Site Runoff Controls	Continue to administer the plan review procedures for all new regulated construction projects.
3.3	Construction Site Inspections and Enforcement	Construction Site Runoff Controls	Continue to administer the inspection and enforcement program and document construction site inspections and any follow-up actions.
3.4	Construction Stormwater Training	Construction Site Runoff Controls	Continue to utilize and track the training program for designated employees.

MCM(s)	BMP	Stormwater Activity	Description/Comments
3.5	Construction Site Stormwater Education	Construction Site Runoff Controls	Continue to provide the construction site erosion control education guidelines to contractors and homebuilders at preconstruction meetings and with the building permit package. Make the guideline available at the City permitting office. A site erosion control brochure was prepared in 2020 and is available to contractors.
4.1	Post-Construction Ordinance	Post-construction Stormwater Management	Continue to administer the existing post-construction runoff ordinance. Document and maintain enforcement actions.
4.2	Long-Term Maintenance of Post-Construction BMPs	Post-construction Stormwater Management	Continue requiring maintenance plans to be filed with the property records of the county.
4.3	Detention Pond Ordinance	Post-construction Stormwater Management	Continue to administer the existing detention pond ordinance. Document and maintain enforcement actions.
5.1	Facility and Stormwater Control Inventory	Post-construction Stormwater Management	Maintain and update, as appropriate, a list of City-owned and operated facilities and stormwater controls.
5.2	Municipal Employee Training Program	Pollution Prevention and Good Housekeeping	Continue to implement the municipal employee training program and maintain a training attendee list with signatures.
5.3	Contractor Requirements and Oversight	Pollution Prevention and Good Housekeeping	Develop and implement contractual requirements for applicable contractor agreements and written oversight procedures. Include and document City-hired consultants and subconsultants are invited to participate in the City staff training.

MCM(s)	BMP	Stormwater Activity	Description/Comments
5.4	Municipal Operations and Maintenance Activities	Pollution Prevention and Good Housekeeping	Develop written O&M procedures and inspection frequencies for the fuel center at the Fire Department and the asphalt/concrete field work. Identify pollutants of concern at the City's shop and asphalt and concrete field work.

F. SWMP Modifications

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

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

No changes are requested at this time.

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.):

   No changes are proposed at this time.

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.

No additional BMPs are being added at this time.

BMP	Description	Implementation Schedule (Start Date etc.)	Status / Completion Date (completed, in progress, not started)
N/A	N/A	N/A	N/A

H. Additional Information

1. Is the permittee relying on another entity to satisfy any permit obligations? (refer to the MS4 General Permit TXR040000 Part IV Section B.2.(g)) ___ Yes _X_ 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: N/A

2.a. Is the permittee part of a group sharing a SWMP with other entities? ___ Yes _X_ 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):

   Authorization Number: _____ Permittee:_____

I. Construction Activities

1. The number of construction activities that occurred in the jurisdictional area of the MS4 (Notices of intent and site notices received; Refer to the MS4 General Permit TXR040000 Part IV Section B.2.(h)) __2_

2a. Does the permittee utilize the optional seventh MCM related to construction? ___ Yes __X_ 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): Darrell Hull Title: City Manager and EDC Executive Director

Signature: Darrell Hull Date: March 28, 2025

Name of MS4 City of Kennedale, 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.