

# GALVESTON COUNTY HEALTH DISTRICT

*Protecting and promoting the One Health of Galveston County.*

**Tyler Drummond**  
United Board of Health  
Chairman



**Philip Keiser, MD**  
Local Health Authority  
Chief Executive Officer

October 23, 2025

TCEQ Water Quality Division  
Stormwater Team Leader (MC-148)  
P.O. Box 13087  
Austin, Texas 78711-3087

Re: Phase II MS4 Annual Report Transmittal for Galveston County  
TPDES Authorization: TXR040364

Dear Team Leader:

This letter serves to transmit the required annual report for the Texas Pollutant Discharge Elimination System Small Municipal Separate Storm Sewer System General Permit, Authorization Number TXR040364 for Galveston County.

The annual report is for Year 7. The reporting period beginning 10/1/2024 and ending 10/10/2025. Note that this is 10 days past the Fiscal Year date (9/30/2025) due to the new MS4 permit being approved on 10/10/2025.

A separate Notice of Change has not been submitted based on the fact that changes have not been proposed for the next permit year.

As required by the general permit, a copy of the report has been mailed to the TCEQ's regional office (713-767-3500) in Houston, Texas.

Sincerely,

A handwritten signature in black ink, appearing to read "Katie Wilson", is written over a horizontal line.

Katie Wilson  
Manager – Air & Water  
Galveston County Health District

xc. TCEQ Houston Region, Storm Water Program, 5425 Polk Ave., Ste. H, Houston, TX 77023-1452  
The Honorable Mark Henry, Galveston County Judge, 722 Moody, 2<sup>nd</sup> Floor, Galveston,  
Texas 77550  
Philip Keiser, MD, CEO, Local Health Authority, 9850-D Emmitt F Lowry Expwy, Texas  
City, Texas 77591



/Permit No.: **STW / TXR040364/ RP**  
**Phase II (Small) MS4 Annual Report Form**  
 TPDES General Permit No. TXR040000

**A. General Information**

1. Authorization Number: TXR040364

Annual Reporting Year: 10/1/2024 – 9/30/2025 (Fiscal Year [last day 10/10/2025 due to new permit approval, Year 7])

MS4 Operator Level: Level 2 Name of MS4 / Permittee: Galveston County

Contact Name: Katie Wilson Telephone Number: 409-938-2310

Mailing Address: PO Box 939, La Marque, Texas 77568 E-mail Address: kwilson@gchd.org

A copy of the report was submitted to the TCEQ Region: Yes  No

Region the annual report was submitted to: TCEQ Region 12

**B. Status of Compliance with the MS4 GP and SWMP**

1. Provide information on the status of complying with permit conditions:

	Yes	No	Explain
Permittee is currently in compliance with the SWMP as submitted to and approved by the TCEQ.	X		
Permittee is currently in compliance with recordkeeping and reporting requirements.	X		

Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.)	X	
Permittee conducted an annual review of its SWMP in conjunction with preparation of the annual report	X	

2. Provide a general assessment of the appropriateness of the selected BMPs:

**Table 1 – BMP Status**

<b>MCM</b>	<b>BMP</b>	<b>BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)</b>
1: Public Education, Outreach, and Involvement	Health District Website's Water Pollution Page	Yes, educating the citizens spreads awareness and will eventually reduce pollutants. Over 2,000 people visited the website's water and onsite sewage facility pages.
1: Public Education, Outreach, and Involvement	Storm Water Brochure	Yes, educating the citizens spreads awareness and will eventually reduce pollutants. 95 brochures were distributed at five government buildings and around 40 brochures were distributed at three (3) outreach events.
1: Public Education, Outreach, and Involvement	Targeted Commercial Brochures	Yes, educating the citizens spreads awareness and will eventually reduce pollutants. 54 grease trap brochures were given to restaurants.
1: Public Education, Outreach, and Involvement	Newsletter 'Pulse' (via email and website)	Yes, educating the citizens spreads awareness and will eventually reduce pollutants. The newsletter is sent to 100% of subscribers and is available on the GCHD website, reaching more than 250 people.
1: Public Education, Outreach, and Involvement	Event Participation	Yes, educating the citizens spreads awareness and will eventually reduce pollutants. The GCHD attended 5 community or speaking events reaching over 450 people.

<p>1: Public Education, Outreach, and Involvement</p>	<p>Enviroscape Presentation</p>	<p>Yes, educating the citizens spreads awareness and will eventually reduce pollutants. The GCHD presented at Trash Bash in Dickinson to 30 participants and at a Keep Beautiful event to 10 volunteers.</p>
<p>1: Public Education, Outreach, and Involvement</p>	<p>Storm Water Inlet Marking</p>	<p>Yes, educating the citizens spreads awareness and will eventually reduce pollutants. 87 markers were inspected, with 21 of those replaced in Bacliff.</p>
<p>1: Public Education, Outreach, and Involvement</p>	<p>Citizen Complaint/Illegal Dumping Hotline</p>	<p>Yes, when pollution violations are reported, immediate action can be taken to remedy the violation with the responsible party. This hotline is maintained 24 hours a day. 100% of applicable complaints are responded to. 39 complaints were made, indicating people are aware of pollution violations and how to report them, and also that there was less pollution to report this year.</p>
<p>1: Public Education, Outreach, and Involvement</p>	<p>Legal Public Notice</p>	<p>No, this BMP does not reduce the discharge of pollutants, but it notifies the public that GCHD has renewed the MS4 General Permit and will continue to complete all BMPs.</p>
<p>1: Public Education, Outreach, and Involvement</p>	<p>Galveston County Storm Water Collaborative</p>	<p>Yes, meeting with other Galveston County city officials and government entities ensures teamwork for tackling pollution issues and meeting permit requirements. The GCHD attended over 10 meetings tackling county issues and forming action plans. Some topics tackled were emergency events, enhancing water quality, FROG, green infrastructure, and education.</p>
<p>2: Illicit Discharge Detection and Elimination</p>	<p>MS4 Storm Sewer Map</p>	<p>No. This BMP does not result in a direct reduction of pollutants, but the cities within Galveston County keep updated maps available for GCHD to use for complaints, grease trap inspections, and storm water sampling. The Health District maintains an MS4 map.</p>
<p>2: Illicit Discharge Detection and Elimination</p>	<p>Storm Water Pollution Preventions Regulatory Instrument-Illicit Discharge</p>	<p>Yes, when illicit discharges are observed, immediate action can be taken to remove the pollutant and track the source using this Order. 100% of the 39 complaints were investigated.</p>

2: Illicit Discharge Detection and Elimination	Pollutants of Concern: Bacteria	Yes, when illicit discharges are observed, immediate action can be taken to remove the pollutant and track the source. This is achievable through dry weather outfall screening and backtracking, responding to complaints, and inspecting facilities, construction sites, and the wildlife park. 100% of the 39 complaints were investigated. The sampling conducted in the wildlife park decreased in exceedance of bacteria from 25% in FY 2024 to 0% in FY 2025. Five (5) WWTP effluents were sampled four (4) times in FY2025.
2: Illicit Discharge Detection and Elimination	Texas Integrated Report Index 303(d) list	No. This BMP does not result in a direct reduction of pollutants, but GCHD will use this information to ensure the current BMPs are fitting or if more need to be added to monitor the new or updated impaired water bodies. There were zero (0) new listings.
2: Illicit Discharge Detection and Elimination	On-Site Sewage Facility (OSSF)	Yes, when illicit discharges are observed, immediate action can be taken to remove the pollutant and track the source. GCHD also tracks over 7000 maintenance contracts on high tech spray OSSF systems. Around 233 OSSF applications were received, and 41 complaints were investigated.
2: Illicit Discharge Detection and Elimination	Grease Trap Inspections	Yes, when illicit discharges are observed, immediate action can be taken to remove the pollutant and track the source. GCHD inspected 27 grease traps in unincorporated Galveston County, and 394 grease traps and 23 grit traps in the contracted entities.
2: Illicit Discharge Detection and Elimination	Employee Training	Yes, educating the employees spreads awareness and will eventually reduce pollutants. Seven (7) employees were trained at GCHD.
3: Construction Site Storm Water Runoff Control	Plan Review and Approval Procedure	Yes, educating the project managers/contractors spreads awareness and the approval procedure ensures BMPs will be implemented on site. Six (6) plans were reviewed and approved.
3: Construction Site Storm Water Runoff Control	Construction Site Brochures	Yes, educating the citizens spreads awareness and will eventually reduce pollutants. Ten (10) brochures were placed at government buildings and five (5) were handed out to construction contractors.

<p>3: Construction Site Storm Water Runoff Control</p>	<p>Storm Water Pollution Prevention Regulatory Instrument- Site Inspection and Enforcement for Erosion and Sediment Control and On-Site Waste Control</p>	<p>Yes, by inspecting the contractor owned construction sites, we can evaluate if proper BMPs are in place to reduce sediment discharge and erosion. Six (6) new construction sites were inspected and there were three (3) ongoing construction site inspections that rolled over into FY25.</p>
<p>3: Construction Site Storm Water Runoff Control</p>	<p>Contractor Certification and Training &amp; City/County Contractor Training</p>	<p>Yes, the pollutants will be reduced over time as awareness spreads. Six (6) engineer/contractors were trained and approved for construction activity.</p>
<p>4: Post-Construction Storm Water Management in New Development and Redevelopment</p>	<p>Plan Review &amp; Approval Procedure</p>	<p>Yes, the pollutants will be reduced over time as the permanent post construction BMPs are utilized. Three (3) plans were reviewed and approved for post-construction.</p>
<p>4: Post-Construction Storm Water Management in New Development and Redevelopment</p>	<p>Storm Water Pollution Prevention Enforcement Tool &amp; Regulatory Instrument- Inspections of Post-Construction Runoff Controls for Long Term O &amp; M Provisions</p>	<p>Yes, by inspecting post construction projects, we can evaluate if proper BMPs are in place to reduce and eliminate potential discharge of pollutants. Post-construction inspections occurred at three (3) construction sites.</p>
<p>5: Pollution Prevention and Good Housekeeping for County Operations</p>	<p>Inventory of MS4's Facilities and Storm Water Controls</p>	<p>Yes, by maintaining a list of facilities and storm water controls, we can evaluate if proper BMPs are in place to reduce and eliminate potential discharge of pollutants. The list was updated and accurate.</p>
<p>5: Pollution Prevention and Good Housekeeping for County Operations</p>	<p>County Construction Projects</p>	<p>Yes, by having contractors sign contracts and holding them accountable to follow storm water pollution prevention requirements and operating procedures, we can ensure proper BMPs are in place to reduce and eliminate potential discharge of pollutants. 100% of the contractors signed a contract.</p>

5: Pollution Prevention and Good Housekeeping for County Operations	County Operation Survey	Yes, by inspecting the county facilities, we can evaluate if proper BMPs are in place to reduce and eliminate potential discharge of pollutants. Three (3) county facilities were inspected.
5: Pollution Prevention and Good Housekeeping for County Operations	Spill Response Kits	Yes, when a spill occurs, immediate action can be taken to contain and remove a spill. All three (3) county facilities had at least one (1) spill response kit on site.
5: Pollution Prevention and Good Housekeeping for County Operations	Employee Training	Yes, educating the employees spreads awareness and will eventually reduce pollutants. 70 county staff were trained in storm water prevention and how to report violations. Seven (7) GCHD staff were presented a pollution prevention video as part of the annual training.

3. Describe progress toward achieving the goal of reducing the discharge of pollutants to the maximum extent practicable (MEP).

**Table 2 – Pollutant Reduction Analysis**

<b>MCM</b>	<b>BMP</b>	<b>Information Used</b>	<b>Quantity</b>	<b>Units</b>	<b>Does BMP Demonstrate a Direct Reduction in Pollutants?</b>
1	1.8 Citizen Complaint/Illegal Dumping Hotline	Reports via phone, email, or in person	39	Complaints	Yes. When illicit discharges are observed and reported, immediate action can be taken to remove the pollutant and track the source for remediation. Complaints indicate citizens are able to recognize pollutants and report them. Complaints received were less than in FY24, indicating people are not polluting as much.
2	2.5 On-Site Sewage Facility (OSSF)	Investigations	41	Investigations	Yes. When illicit discharges are observed, immediate action can be taken to remove the pollutant and track the source for remediation.
3	3.3 Construction Site Inspections	Site Inspection (as able)	9	Inspection	Yes. By inspecting the contractor-owned construction sites, we can evaluate if proper BMPs are in place to reduce sediment discharge and erosion.
4	4.2 Post Construction Inspection	Site Inspection (as able)	3	Inspection	No. The pollutants will be reduced over time as permanent post-construction BMPs are utilized.
5	5.3 County Operations Survey	Facility Audits	3	County Facilities	Yes. By inspecting the county facilities, we can evaluate if proper BMPs are in place to reduce and eliminate potential discharge of pollutants, and equip the staff with the tools for recognizing, reporting, or remediating pollution.

4. Provide an assessment of the appropriateness of the implementation of the measurable goals of each MCM and an evaluation of the success of the implementation, including any obstacles or challenges.

**Table 3 – Measurable Goals Status**

<b>MCM(s)</b>	<b>Measurable Goal(s)</b>	<b>Explain progress toward goal or how goal was achieved.</b>
1	Maintain 24-hour Citizen Complaint/Illegal Dumping Hotline. Respond to 100% of issued complaints per year.	Goal Met: Responded to the 39 complaints received.
2	Receive over 20 OSSF applications and respond to over 30 OSSF complaints.	Goal Exceeded: Received 233 OSSF applications and responded to 41 complaints.
3	Perform site inspections at all active construction sites.	Goal Met: Inspected 9 of 9 active construction sites.
4	Inspect at least 1 post-construction project site as able.	Goal Met: Inspected 3 of 3 post-construction sites.
5	Audit 3 county facilities and train at least 40 employees.	Goal Met: Audited 3 county facilities and trained 70 employees.

### C. Storm Water Data Summary

Provide a summary of all information used, including any lab results (if sampling was conducted) to assess the success of the SWMP at reducing the discharge of pollutants to the MEP. For example, did the MS4 conduct visual inspections, clean the inlets, look for illicit discharge, clean streets, look for flow during dry weather, etc.?

The Galveston County Water Pollution Control and Abatement Program of the Galveston County Health District has monitored local waterways in Galveston County since 1972. Today, we contract with nine (9) of the local city jurisdictions and with the County of Galveston to conduct ambient water monitoring. The highly trained staff of water investigators routinely collect water samples around the county. These samples are tested at the Eastex Environmental Laboratory, a NELAC certified lab. The results of those samples are compiled and reviewed by staff to determine if any additional sampling and source tracking activities are necessary. In addition, these test results compiled from our ambient water testing are included in a comprehensive annual report that is submitted to our contracted cities and our public health partners. These documents are maintained in GCHD files. Results from the bacteria samples are compared to the State of Texas Surface Water Quality Standards. The primary contact recreation standard for *E. coli* single grab samples is 394 MPN/100-mL and the standard for *Enterococci* is 104 MPN/100-mL. When bacteria levels exceed the standard, other parameter results are evaluated, such as Dissolved Oxygen, pH, Biological Oxygen Demand, rainfall, and Ammonia, to determine if those parameters are also elevated.

From October 2024 to September 2025, bacteria levels at the 13 sites were sampled in the jurisdictional area of the SWMP (Galveston County, unincorporated). These sites exceeded the standard for single grab samples in contact recreational systems 29.5% of the time in FY 2025. In comparison, samples exceeded 32% during FY 2024, 35% during FY 2023, and 31% during FY 2022. Many of these exceedances occurred within three days of a rainfall event or high tide.

GCHD also contracts with the following cities: Dickinson, Friendswood, Hitchcock, Jamaica Beach, La Marque, League City, Municipal Utility District #12 in Bayou Vista, Santa Fe, and Texas City. Under this contract, GCHD monitors storm water and ambient water quality. From October 2024 to September 2025 bacteria levels at the 77 sites were sampled. Bacteria levels at these sites exceeded the standard for single grab samples in contact recreational systems 30% of the time in FY 2025. Compared to samples at the 77 total sites that exceeded 40% of the time during FY 2024, 77 total sites that exceeded 37% of the time during FY 2023, and 77 total sites that exceeded 30% of the time during FY 2022. Many of these exceedances occurred within three days of a rainfall event.

As part of the implementation of the approved BMPs, GCHD re-evaluated water quality sampling sites in permit year four to help identify pollution sources and to reduce the discharge of pollutants to the MEP. Pollution in terms of bacterial contamination in the unincorporated areas of the county decreased from 32% in FY 2024 to 29.5% in FY 2025. County-wide (including contract sampling within cities) bacterial contamination decreased from 39% in FY 2024 to 30% in FY 2025. Any site with both Ammonia and Bacteria levels exceeding the standard is sampled until the source is detected and remediated unless it is found to be an isolated dumping incident or natural occurrence.

## D. Impaired Waterbodies and Total Maximum Daily Loads

1. Identify whether an impaired waterbody 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.

A search of the 2024 EPA-approved 303(d) list shows zero (0) newly identified impaired waters in the Galveston County urbanized areas.

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.

GCHD utilizes storm water sampling and backtracking to monitor the pollutant of concern, bacteria. The exceedance percentage decreased 9% in contracted cities and decreased 2.5% in Unincorporated Galveston County. The GCHD also utilizes public education, responds to citizen complaints, and inspects OSSFs and WWTPs to address and reduce the discharge to impaired waterbodies.

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

Implemented targeted controls include inspection of on-site sewage facilities and wastewater treatment plants, investigation of sewage and OSSF complaints, storm water sampling for bacteria impairment, and public education, especially for pet waste and other bacteria sources. GCHD is a part of the BIG Workgroup, Clear Creek Watershed Partnership, National Resource Advisory Committee, Galveston Bay Council, Coalition of Watersheds, and others, to focus efforts on reducing bacteria in impaired waters.

4. Report the benchmark identified by the MS4 and assessment activities:

<b>Benchmark Parameter (Ex: Total Suspended Solids)</b>	<b>Benchmark Value</b>	<b>Description of additional sampling or other assessment activities</b>	<b>Year(s) conducted</b>
<i>Bacteria</i>	Respond to 100% of complaints	Inspected all 39 complaints received; decreased reporting of 9 from the previous year.	Annually
<i>Bacteria</i>	Track over 3000 contracts, receive over 20 OSSF applications, and respond to over 30 OSSF complaints.	GCHD tracks over 7000 maintenance contracts on high tech spray OSSF systems. Around 233 OSSF applications were received, and 41 complaints were investigated.	Annually
<i>Bacteria</i>	13 Galveston County Sample Sites	Monitored and sampled eight (8) Galveston County mainland sites and five (5) sites on Bolivar; brings awareness to illicit discharges or dumping.	Annually
<i>Bacteria</i>	12 Wastewater Treatment Plant Inspections	Inspected and conducted sampling at 12 facilities, 5 of which are unincorporated GC, which helps facilities stay under permit limits.	Annually

5. Provide an analysis of how the selected BMPs will be effective in contributing to achieving the benchmark:

<b>Benchmark Parameter</b>	<b>Selected BMP</b>	<b>Contribution to achieving Benchmark</b>
<i>Bacteria</i>	Storm Water Sampling	The exceedance percentage decreased 9% in contracted cities and decreased 2.5% in Unincorporated Galveston County.
<i>Bacteria</i>	Citizen Complaints	Complaints were down by 9 since FY2024; all 39 complaints were investigated and resolved or are still in progress.
<i>Bacteria</i>	On-Site Sewage Facilities (OSSFs)	41 complaints were investigated, 1 more than in FY2024.

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

<b>Description of bacteria-focused BMP</b>	<b>Comments/Discussion</b>
On-site Sewage Facilities	Inspections of OSSFs and maintenance contracts.
Illicit Discharges	Complaints, grease trap inspections, construction site inspections, WWTP sampling, and storm water sampling; backtracking when required.
Animal Sources	Complaints, storm water sampling, and inspection of Bayou Wildlife Park.

Residential Education	Public education events, brochure handouts, presentation of the Watershed Enviroscope, and collaborative groups.
Wastewater Treatment Plants	Inspections and sampling, which helps facilities stay under permit limits.

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

Benchmark Indicator	Description/Comments
Number of citizen reports generated and investigated	39 reports were generated and investigated, 9 less than in FY 2024.
Number of citizens educated	Over 2,000 citizens through presentations, the newsletter, GCHD website, brochures, and other means.
Number of County and GCHD staff trained	77 County and GCHD staff trained.
Decrease in number of OSSF overflows reported	The number of reports increased from 40 to 41.

**E. Storm Water Activities Next Reporting Year**

All storm water activities reported in Table 1 – BMP Status will be continued in the next reporting year, until approval of the NOI for the new SWMP permit.

**F. SWMP Modifications and Additional Information**

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

**G. Additional BMPs for TMDLs and I-Plans**

No additional BMPs were found to be necessary at this time.

**H. Additional Information**

1. Is the permittee relying on another entity to satisfy any permit obligations? \_\_\_X\_\_\_ Yes \_\_\_ No

If Yes, provide the name(s) of other entity/ies and an explanation of their responsibilities (add more spaces or pages if needed):

Name and Explanation: Galveston County contracts the GCHD to conduct MS4 work in the unincorporated urbanized areas of Galveston County. Galveston County and the GCHD will be utilized interchangeably in the report.

- 2.a. Is the named permittee 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 permit numbers and permittee names (add additional spaces or pages if needed):

Authorization Number: N/A Permittee: N/A

### I. Construction Activities

1. The number of construction activities that occurred in the jurisdictional area of the MS4 (Large and Small Site Notices submitted by construction site operators): Three (3) total construction site activities between 0-5 acres in unincorporated Galveston County were submitted to GCHD. Seven (7) large construction site activities were submitted by construction site operators to GCHD.
2. Does the permittee utilize the 7<sup>th</sup> MCM related to construction?      Yes            No

### J. Certification

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): Katie Wilson

Title: Manager – Air & Water

Signature: *Katie Wilson*

Date: 10/23/25

Name of MS4: Galveston County

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