

City of Fulshear Pest Management Strategy

The City of Fulshear will continue to cooperate with Fort Bend County on Pest Management issues, specifically in those issues involving Mosquitoes and the containment of West Nile Virus carrying pests. The City has completed a Self Certification Form for Level II under the TDPEs General Permit TXG870000; as it does not plan to provide Vector licensed chemical pesticide applications on its own. The City will continue to coordinate any such application with the County. The pest abatement strategy below details the manner in which steps will be taken to remediate pest (and specifically Mosquito) populations.

Step 1: Identifying the Pest Population and affected areas

The City will rely on a three-fold strategy to identify pest affected areas that may require pest management practices.

- The first means of identifying affected area will be Client Complaint Driven; the City will monitor reports from citizens as the nature and volume of pests in a given affected environment.
- The second means of identifying affected areas will come from County Driven Pest Population Monitoring. The City and County have identified a number of locations throughout the community where mobile monitoring stations can be installed to identify the type and number of pests located within the approximate area.
- The final means of identifying affected areas will come from City Maintenance staff checking for larval development in standing areas of water along the City's Rights of Way. Many of the City's Rights of Way do not adequately drain and will be checked bi-weekly by the Maintenance staff for the presence of pest larvae. If larva are discovered a photo will be taken of the larvae in the monitoring device to approximate the density level of the pest population in the water.

Step 2: Remediation Procedures

Once a problem area has been identified through one of the three mechanisms listed above the City will work in conjunction with the County Road and Bridge Department to determine the level of response.

- Under no circumstance will the City initiate spraying on its own.
- The City will rely on the County for any remediation requiring Vector Control licensed application unless said application is being conducted by a private spraying contractor hired by a private entity such as a Home Owner's Association (HOA). The City will work to ensure that any such private spraying be coordinated through the County and that all necessary licenses and records are available to any government body requiring documentation to ensure compliance with TCEQ and FIFRA requirements.
- The City may utilize various "dunk" products including BTI Brickettes as larvacides to be placed in standing bodies of water located within the City's Rights of Way. Additionally, the City may distribute to other Public and Non-public entities such "dunks" as may be merited to remediate pests around the City and in areas to which the City does not have lawful access (private ponds, etc.). Any product used or issued by the City shall not require Vector License certification and shall be used only as directed on the label of the product. Furthermore, the City will keep a record of all such applications of larvacides as required under the TDPEs General Permit TXG870000. Finally under no circumstances shall the City distribute or apply such larvacides to an area greater than 100 acres of water or greater than 200 linear miles at water's edge.

- Any remediation step undertaken by the City shall seek to base the frequency of application on the lowest frequency possible to provide effective and economical control and to prevent unnecessary impact on non-target organisms.

Step 3: Evaluation and Feedback

Following the implementation of one or more Remediation Procedures, the City will work with the County and any private complainant to measure the impact of the remediation.

- For Client Complaint driven responses, this shall include the collection of anecdotal information on the frequency and number of pest interactions within a 10 day period following remediation.
- For County Monitoring this shall include a count of pests targeted as trapped following remediation as compared to a count prior to the remediation activity.
- For City Monitoring this shall include photographic evidence of larvae density pre and post remediation. The site shall be monitored within 10 days of the period of remediation.

All such feedback and monitoring documentation shall be attached to the records of remediation activities.

Corrective Action

- A. Situations Requiring revision of Control Measures : The City shall review and revise control measures if any of the following situations occur to ensure that the situation is eliminated and will not be repeated:
 - An unauthorized release or discharge (e.g., spill, leak, or discharge not authorized by this or another TPDES permit) occurs;
 - The City becomes aware, or the Executive Director determines, the control measures are not adequate or sufficient for the discharge to meet applicable water quality standards;
 - The Executive Director determines that The City failed to:
 1. Use only the amount of pesticide and frequency or pesticide applications necessary to control the target pest, using equipment and application procedures for this task;
 2. Perform regular maintenance activities to ensure that the application equipment is in proper operating condition to minimize the potential for leaks, spills, and unintended or accidental release of pesticides to waters of the U.S.; or
 3. Calibrate, clean, and repair equipment on a regular basis to ensure that the application equipment is in proper operating condition.
 - TCEQ determines that modifications to the control measures are necessary to meet the effluent limits in this permit; or
 - The City observes or is otherwise made aware of a toxic or adverse effect.
- B. Corrective Action Documentation: For situations requiring revision of control measures other than for toxic or adverse effects, a permittee shall document the situation triggering corrective action within 24 hours of becoming aware of that situation. The documentation must include the following information:
 1. Identification of the condition(s) triggering the need for corrective action;
 2. A brief description of the circumstances of the situation;

3. Date the problem was identified;
 4. Date corrective action was initiated; and
 5. Date corrective action was completed or expected to be completed.
- C. Corrective Action Deadlines: If a permittee determines that changes to control measures are necessary, those changes must be made before the next pesticide application that results in a discharge, or as soon as practicable.

Recordkeeping

The City shall keep the following records on site for a minimum of 5 years from the date the record was created and shall submit them to the Executive Director within five days of a written request by the Executive Director;

- A copy of the permit (an electronic copy is acceptable);
- A copy of any Adverse Incident Reports; and
- A copy of the Self Certification Form.

Reporting and Notification

- A. Potential Adverse Incident Notification. If a permittee knows or has been informed of an adverse incident, The City shall notify the appropriate TCEQ Regional Office within 24 hours of becoming aware of the potential adverse incident or call the TCEQ 24-hour Spill Reporting Line at 1-800-832-8224. If The City is unable to notify TCEQ within 24 hours, The City shall do so as soon as possible and provide the rationale why The City was unable to provide the notification within 24 hours.

When providing the 24-hur notice for any potential adverse incident, The City shall include at least the following information:

1. The name and telephone number of the person providing Notification;
 2. Permittee name and mailing address;
 3. The name and telephone number of a contact person, if different from the person providing the 24-hour notice;
 4. How and when the person providing notification became aware of the adverse incident;
 5. Description of the location of the adverse incident;
 6. Description of the adverse incident identified;
 7. The pesticide product, including EPA pesticide registration number for each pesticide that was applied in the area of the adverse incident; and
 8. Description of any corrective actions The City has taken or will take to prevent recurrence.
- B. Adverse Incident Written Report. Within fourteen (14) days of becoming aware of an adverse incident, The City shall provide a written report of the adverse incident to the appropriate TCEQ Regional Office. The adverse incident report shall include at least the following information:
1. Information required to be provided in Part IV.E.2; Date and time The City provided 24 hour notice to the Commission of the adverse incident;

2. Location of the adverse incident, including the names of any waters affected and appearance of those waters (sheen, color, clarity, etc.);A description of the circumstances of the adverse incident including species affected, number of individuals and approximate size of dead or distressed organisms;
3. Magnitude of the effect (e.g., aquatic square area or total stream distance affected);Pesticide application rate, application site (e.g., water's edge, above, or direct to water), and method of application;
4. Description of the habitat and the circumstances under which the adverse incident occurred (including any available ambient water data);
5. If laboratory tests were performed, an indication of which test(s) were performed, and when, and provide a summary of the test results immediately upon availability (if not available at the time of submission of the 14-day report);
6. If applicable, explain why The City believes the adverse incident could not have been caused by exposure to the pesticide;
7. Description of any corrective actions The City has taken or will take to prevent recurrence; and
8. Target and non-target organism(s) that were affected.