

Summary Status Report and Annual Reports

GCSA Employee Training

Tulsa Mohawk Education Auditorium

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“Summary Status” in OKR04

- Only mentioned twice in OKR04 (Part III.A.1.a):

*a. Renewal Permittees: You must submit a new NOI ..., a **summary status** of your current Stormwater Management Program (SWMP) within the previous permit term, and an updated description of your current SWMP*

*You must include a list of current measurable goals for all six (6) or seven (7) Minimum Control Measures (MCMs) and **summary** of all Best Management Practice (BMP) activities actually accomplished in the **summary status** of your current SWMP. Also you must include the changes to any BMPs or any measurable goals that apply to your current SWMP.*

Summary Status History

- Earlier versions of draft OKR04 (2006 – 2009) required a “Final Annual Report” – to be filed with the NOI.
- No mention of “Summary Status”.
- 2013 version of OKR04 through 2015 final dropped the “Final Annual Report”; replaced with “Summary Status”.
- OKR04 only has general references to contents.
- From INCOG’s meetings with ODEQ, ODEQ wants only a brief summary (4-10 pages) of past activities.
- Purpose is to be used with Audit results to understand present permit compliance status.

Summary Status Main Points

- Independent of how many “Annual Reports” have been submitted since OKR04 expired in February 2010.
- Summary Status should cover entire permit period, from 2005-06 start to present.
- Do not create detailed tables, lists, etc. of each BMP’s annual outputs – e.g., no data on numbers of what was done.
- Start with original BMP list, show changes through the past 10 year period.
- Presently uncertain about exact contents. ODEQ and INCOG are working on checklist and topics.

Summary Status Report Content Ideas

- INCOG and ODEQ ideas to date are:
 - Permittee: basic information.
 - Background: overview of past SWMP implementation, problems, solutions, present status.
 - Changes to BMPs: How has MS4 gone from original to present BMPs.
 - Present BMPs: status of active program elements.
 - 303(d) and TMDL Waterbodies: what is within MS4 area that must be addressed.
 - Funding: how the program has been funded, plans for future.

Annual Report Status

- Since OKR04 expiration in February 2010, continuing to submit AR's was optional.
- Most permittees did not submit AR's.
- Part V.C in OKR04 (contents of AR's) did not change much.
- 2005 OKR04 had 60 days from date of authorization to submit.
- 2015 OKR04 requires AR submittal either March 1 (calendar year) or September 1 (fiscal year).
- No templates or guidance from ODEQ. INCOG checklist.
- New EPA requirements in near future will change this.

Annual Report References in OKR04

- There are numerous references in OKR04 to reporting information annually to ODEQ. Too many to list.
- For present report contents, refer to Part V.C.
- INCOG will also prepare a GCSA Fact Sheet on help with preparing AR's.
- EPA's new E-Reporting Rule will change how AR's are filed.
- INCOG will begin meeting with ODEQ mid-2016 to develop guidance for permittees to meet the new EPA rule reporting requirements.

EPA's New E-Reporting Rule

- Finalized September 24, 2015.
- Affects all NPDES permit holders, including OKR04 permittees.
- Main goal is to provide a systematic way for discharge permit information to be collected and organized by permitting authorities.
- It also allows greater access of data to the public.
- Very specific data standards will trigger the need to change how OKR04 Annual Reports are prepared.

Annual Report First Submittal Year

- INCOG is seeking clarification from ODEQ on when the first Annual Reports must be submitted: 2016 or 2017.
- The new EPA E-Reporting Rule will probably not apply to the first AR's, but most likely will thereafter.

Thank you. Any Questions ?



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