

# Overview of Major Changes in New OKR04

GCSA Employee Training

Tulsa Mohawk Education Auditorium

August 26, 2015

Richard Smith, INCOG Contractor

# List of Major Changes in Draft OKR04

- Added “watershed plan” in lieu of TMDL.
- “Summary status” instead of Final Annual Report.
- Permit now covers all of city limits, not just UA.
- NOI – added protection of ORW and TMDLs to 303(d).
- Assess new flood management projects for WQ impacts.
- Examine necessity of adding WQ to existing projects.
- For bacteria 303(d), must address 5 areas of control.
- Adopt TMDL-assigned WLAs as Measurable Goals.

# Addressing Bacteria 303(d)

- Part III.A.1.g – BMPs to address Bacteria 303(d):
  1. Sanitary sewer systems
  2. On-site sewage facilities
  3. Illicit discharges and dumping
  4. Animal sources
  5. Residential education
- Must submit your proposed list of BMPs to ODEQ for review.

# Major Changes List (cont.)

- Verify compliance with meeting IDDE Meas. Goals.
- Educate employees who work in the field.
- Must attempt to maintain pre-development runoff conditions.
- Review local codes and remove LID barriers.
- Ensure long-term O&M of post-construction BMPs, including inspections of each BMP.
- Educate developers and the public about LID.
- Consider adopting LID using local ordinances.

# Major Changes List (cont.)

- Develop various types of plans, such as “Spill Response and Prevention Plan”, “Operation and Maintenance Plan”, or “establish procedures to...”.
- “Recommendations are not permit requirements.”
- Present OKR04’s “Rationale” items have become either recommendations or requirements.
- TMDL Implementation – a separate ODEQ program that will affect OKR04 permittees.
- Part VIII (7<sup>th</sup> MCM) extensive updates to match OKR10.
- All Annual Reports due March 1 (or September 1?)

# New TMDL Implementation

- TMDLs – two types: notification and EPA Approved.
- TMDLs – two types: aggregated and individual MS4.
- Notification TMDLs have had no ODEQ notifications.
- ODEQ will begin the process of notifying MS4s.
- Must refer to each TMDL document's Appendix to see what is required of permitted MS4s.
  - *Pollutant reduction plan,*
  - *Monitoring plan, and*
  - *Annual reporting.*

# INCOG TMDL Support to GCSA

1. Work with ODEQ to educate permitted MS4s.
2. Keep GCSA informed of latest TMDL information.
3. Acquire latest TMDL data from ODEQ and distribute to GCSA (maps, tables, fact sheets, etc.).
4. Develop QAPP guidance and templates.
5. Help establish regional monitoring where feasible.
6. Help establish local monitoring.
7. Help with data analysis and reporting.



# Thank you. Any Questions ?



Richard B. Smith

INCOG

(918) 579-9450

[rsmith@incog.org](mailto:rsmith@incog.org)

