

Types of Sampling and Monitoring Required in OKR04

Green Country Stormwater Alliance
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INCOG

Limitations on Coverage

I. C Limitations on Coverage

5. Discharges Exceeding Water Quality Standards:

“Your SWMP must include a description of all necessary Best Management Practices (BMPs) and other measures that you will be using to **ensure** that discharges, or future discharges, **will not cause**, have the **reasonable potential to cause, or contribute to** an exceedance of water quality standards.”

Limitations on Coverage

I. C Limitations on Coverage

6. Discharges not consistent with a Total Maximum Daily Load (TMDL):

“Discharge of a pollutant into any water for which a TMDL, or watershed plan in lieu of a TMDL, for **that pollutant** has been either established or approved by DEQ or U.S. environmental Protection Agency (EPA) is prohibited, unless your discharge is consistent with that TMDL, or watershed plan.” ...

Discharges and TMDLs

I.C Limitations on Coverage

6. "...You must incorporate into your SWMP any conditions necessary to **ensure** discharges are consistent with the assumptions and requirements of any such TMDL, or watershed plan."

We will talk about this a little later.

Special Conditions

Part III: Special Conditions

III. A Compliance with Water Quality Standards

“Operators seeking coverage under this Permit shall not **be causing** or have the **reasonable potential** to cause or **contribute** to a violation of a water quality standard. If you have discharges to receiving waters included on the latest CWA 303(d) list of impaired waters, you must document in your SWMP how you will comply with the following requirements:”

Monitoring

PART V: Monitoring, Record Keeping, and Reporting

V.A. Monitoring

1. Designing Your Monitoring Program:

“You must evaluate SWMP compliance, the appropriateness of identified BMPs, and progress toward achieving identified measurable goals. If you discharge to a water of the state for which a TMDL has been approved, you may have additional monitoring requirements under Part III of this Permit.”

Monitoring

2. Conducting Monitoring: If you plan to conduct monitoring, you are required to comply with the following:
 - a. “Representative monitoring: Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.”
 - b. Laboratory Methods
“If laboratory analysis is conducted it must be conducted according to test procedures approved under 40 CFR part 136.”

Monitoring

3. Records of Monitoring Information: Monitoring records must include:
 - a. The date, exact place, and time of sampling or monitoring;
 - b. The name(s) of the individual(s) who performed the sampling or monitoring;
 - c. The date(s) analysis was performed;
 - d. The names of the individuals who performed the analyses;
 - e. The analytical techniques or methods used; and
 - f. The results or observations of such analyses.

Monitoring

4. Discharge Monitoring Report (DMR):

“The reporting of monitoring results may be required, by the Director, to be submitted on a Discharge Monitoring Report.”

Recordkeeping

V. B Recordkeeping

1. Retain Records of All Monitoring Information

- All calibration and maintenance records;
- All reports required by the permit;
- A copy of any OPDES permits; and
- Records of all data used to complete the NOI.

All records must be kept for a period of at least three (3) years from the date of the sample, measurement, report or application, or for the term of this Permit, whichever is longer.

Operation & Maintenance

VI. J Proper Operations and Maintenance:

“Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures.”

Inspection & Entry

VI. K Inspection and Entry

DEQ is allowed to:

- “Have access to and copy at reasonable times, any records that must be kept under the conditions of this permit.”
- “Inspect at reasonable times any facilities or equipment (including monitoring and control equipment) practices, or operations regulated or required under this Permit.”
- “Sample or monitor any substances or parameters at any location at reasonable times for the purposes of assuring permit compliance or as otherwise authorized by the CWA.”

Municipal Construction Activities

VIII. B Optional Permit Requirements for Municipal Construction Activities

4. Water Quality Based Effluent Limitations

a. Discharges to Waters Identified as **Impaired** Waters

- (2) “Site inspection requirements: You must conduct site inspections once every seven (7) calendar days at a minimum, and within 24 hours of a storm event of 0.5 inches or greater or within 24 hours of a discharge caused by snowmelt.”

Municipal Construction Activities

VIII. B Operational Permit Requirements for Municipal Activities

4. Water Quality Based Effluent Limitations

b. Discharges to Waters Identified as an **Outstanding Resource Water** (ORW) or **Aquatic Resource of Concern** (ARC)

(3) “...you must conduct inspections within seven (7) calendar days and within 24 hours of the occurrence of a storm event of 0.5 inches or greater.” (If not an ORW or ARC, inspect every fourteen (14) calendar days.)

TMDL Appendix G

At the end of the Draft 2015 Bacterial and Turbidity TMDL for Oklahoma Streams in the Arkansas and Neosho River Areas TMDL you will find:

Appendix G. “Stormwater Permitting Requirements and Presumptive Best Management Practices (BMP) Approach.”

A. Background

“These programs contain specific requirements for the regulated communities/facilities to establish a comprehensive stormwater management program (SWMP) or stormwater pollution prevention plan (SWPPP) to implement any requirements of the total maximum daily load (TMDL) allocation.”

TMDL Appendix G

A. Background

“A monitoring component is also included in the recommended BMP approach. Each stormwater permit **should include a coordinated and cost-effective monitoring program** to gather necessary information to determine the extent to which the permit provides for attainment of applicable water quality standards and to determine the appropriate conditions or limitations for subsequent permits.”

“No numeric effluent limitations are **required or anticipated** for municipal stormwater discharge permits.”

TMDL Appendix G

B. Specific SWMP/SWPPP Requirements

Permits affected by this TMDL report:

City of Jenks

City of Sand Springs

City of Sapulpa

City of Tahlequah

City of Tulsa

“To ensure compliance with the TMDL requirements under the permit, stormwater permittees **must** develop strategies designed to **achieve progress** toward meeting the reduction goals established in the TMDL.”

TMDL Appendix G

B. Specific SWMP/SWPPP Requirements

“The permittee should provide guidance on BMP installation and maintenance, as well as a monitoring **and/or** inspection schedule.”

“...when a BMP approach is selected a coordinated monitoring program is necessary to establish the effectiveness of the selected BMPs and demonstrate progress toward attaining water quality standards. The monitoring results should be used to refine bacterial controls in the future. With nine permitted entities in the watershed, it is likely that a cooperative monitoring program would be more cost effective than nine individual programs. Individual permittees are not required to participate in a coordinated program and are free to develop their own program if desired.”

Questions?

“You can’t trust water: Even a
straight stick turns cooked in it.”
W.C. Fields

