

ANNUAL REPORT TO ODEQ FOR PHASE II STORMWATER
PERMITTED MS4S

City of Catoosa

Name of Permitted MS4	City of Catoosa
MS4 OKR04 Permit Number	OKR000001
AR Reporting Period	July 1, 2021 to June 30, 2022
AR Original Completion Date	October 17, 2022
AR Latest Revision Number	0 (no revisions to original)
AR Latest Revision Date	0 (no revisions to original)
AR Preparer Name and Title	John Blish, City Manager
MS4 Contact Name and Title	Eddie Faulkner, Assistant City Manager
MS4 Contact Phone and Email	(918) 266-2505, EFaulkner@cityofcatoosa.org

EXECUTIVE SUMMARY

The City of Catoosa herein submits this Annual Report to the Oklahoma Department of Environmental Quality (ODEQ) as a comprehensive summary of all activities accomplished during the AR period of record. This AR is required by Part VI. C. of the ODEQ General Permit/or Phase II Small Municipal Separate Storm Sewer System (MS4) Discharges within the State of Oklahoma, (OKR04). References are also made in this AR to the City of Catoosa Stormwater Management Program (SWMP) document. Contents of the SWMP are reviewed annually and revisions made as needed. The sections of this Annual Report address all requirements in OKR04 Part VI. C. and within other parts of the OKR04 permit:

Section	Section Title
I	Certification Statement
II	Overview of the Stormwater Program Implementation
III	Compliance Status, BMP Assessment and Achievement Progress
IV	Proposed Changes to the SWMP or Best Management Practices (BMPs)
V	Additional BMPs Being Implemented to Address 303(d) Waters
VI	Additional BMPs Being Implemented to Comply with TMDLs
VII	Agreement With Another Government Entity

Questions for local officials about this AR or stormwater program should be directed to the MS4 Contact Person listed on the cover page. Questions about the State's Phase II Stormwater Permit Program should be directed to the ODEQ Water Quality Division.

I. CERTIFICATION STATEMENT:

The following certification statement is required by OKR04 Part VII.H. Requirements for who should sign the certification are specified in OKR04 Part VII.H. For municipalities, the certification must be signed by a principal executive officer or ranking elected official. Refer to OKR04 Part VII.H for all signatory and certification requirements.

"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


Title


Date

II. OVERVIEW OF THE STORMWATER PROGRAM IMPLEMENTATION:

The following is a brief overview of the past year’s implementation activities. Additional details about each item are presented elsewhere in the Annual Report.

Table 1: Stormwater Program Overview

Annual Report Conditions	Activity Description
Fiscal Year or Calendar Year	We compile program data on a fiscal year basis.
Governmental Entities Used	We are a member of INCOG’s Green Country Stormwater Alliance (GCSA). INCOG provides certain services that are discussed in the Annual Report.
Consultants, Organizations Used	Meshek & Associates assisted with the stormwater program.
SWMP Review	The SWMP is still being revised to comply with the 2021 OKR04 permit requirements.
Changes Planned for Next Year	No changes are currently planned.
Program Funding Sources	Stormwater fee pays for most of program costs; some manpower for inspections is paid from Public Works.
303(d) Impaired Waters	About 10% of the Bird Creek watershed is in the MS4 area. It is impaired for bacteria Enterococcus (4a) and E-Coli (4a).
TMDL Watersheds in MS4	The Lower Bird Creek TMDL went into effect on June 1, 2022. The City of Catoosa has elected to use the TMDL Pollutant Baseline Monitoring Plan and will work to implement this over the next three years.
Aquatic Resources of Concern (ARC) for Protected Species in MS4	There were no ARCs in the MS4 during this AR cycle.
Outstanding Resource Waters (ORW) in MS4	There are no ORW waters within the MS4.

III. COMPLIANCE STATUS, BMP ASSESSMENT, AND ACHIEVEMENT PROGRESS:

The following is a summary of the assessment of the stormwater program for the City of Catoosa. This assessment addresses the specific Annual Report requirements in OKR04 Part VI. C. Part VI. C. has multiple requirements:

1. Status of Compliance with permit conditions (Table 2)
2. Assessment of appropriateness and progress of each BMP (Table 3)
3. Result of information collected
4. Summary of activities for next reporting cycle (Table 3)
5. Summary of proposed changes
6. Description and schedule for additional BMPs

7. Description and schedule for BMPs for TMDL requirements
8. Information on all new annexed areas resulting in changes to SWMP
9. Notice of reliance on another government entity

Items 1, 2 and 4 are discussed in the following tables. No monitoring data was collected during this reporting period. No changes are proposed for next year and no additional BMPs are anticipated at this time. There has been no new annexed area resulting in changes to the SWMP. As discussed in Table 1 above and the SWMP, the City relies on INCOG to satisfy some permit requirements, such as staff training.

A. Item a in OKR04 Part VI. C. 1. “Report the status of your compliance...”

The following list of Permit Conditions is taken from the OKR04. The “Permit Conditions” represent all major areas of permit requirements that must be addressed in OKR04 compliance. The items labeled “MCM” are the six Minimum Control Measures. The status assigned to each of these Permit Conditions in Table 2 below is general; each of the MCMs is addressed in greater detail in Table 3, Assessing BMPs.

Permit Condition	Compliance Status	Future Actions Needed
Allowable Discharges	Reviewed list; no changes made	Review annually and/or as needed
Historic Preservation	No Section 106 Federal actions taken by MS4 this report cycle	Will contact ODEQ if we are notified if any Section 106 reviews are needed
Endangered Species/Aquatic Resources of Concern (ARC)	No part of the MS4 is within an ARC. No actions to protect endangered species were needed this report cycle	Will contact ODEQ if MS4 is notified those actions must be taken to protect endangered species
Co-Permittees	The City of Catoosa is not a co-permittee with another MS4	No status change is expected
Water Quality Standards (WQS)	The MS4 was not notified this report cycle of any WQA violations caused by stormwater discharges	Will contact ODEQ upon any notification to develop a strategy to protect WQS
303(d) Impaired Waters	The MS4 performed enhanced BMPs as described in Table 3 below. No 303(d)-parameter field or lab data was collected this reporting cycle	MS4 will continue to implement enhanced BMPs to address 303(d) impairment
TMDL Compliance	The MS4 has begun reviewing TMDL documentation and determining monitoring locations and steps to reduce impact	MS4 has chosen Option B and will be working on TMDL Pollutant Baseline Monitoring Plan throughout next reporting cycle

Permit Condition	Compliance Status	Future Actions Needed
Outstanding Resource Waters (ORW)	The MS4 is not within an ORW watershed	No status change is expected
MCM 1: BMPs and Measurable Goals	Implementation; no issues observed or reported	Continue implementation
MCM 2: BMPs and Measurable Goals	Not applicable	Not applicable
MCM 3: BMPs and Measurable Goals	Implementation; no issues observed or reported	Continue implementation
MCM 4: BMPs and Measurable Goals	Implementation; some issues needing correction	Will hold trainings
MCM 5: BMPs and Measurable Goals	Implementation; some issues needing correction	Will work on amending ordinance and will hold staff training
MBM 6: BMPs and Measurable Goals	Implementation; minor issues needing correction	Will hold staff trainings and begin inspecting City facilities
SWMP Updates	SWMP is being updated to comply with new permit requirements	SWMP will be updated by June of 2023
ODEQ Enforcement Actions Against MS4	None this reporting cycle	No actions anticipated
24 Hours Reporting of Pollution Events by MS4	No episodes to report this cycle	Will report episodes as needed

B. Item B in OKR04 Part V.C. 1. “For each BMP identified in your SWMP, include an assessment of...”

The following information in Table 3 assesses each Best Management Practice (BMP) for each of the six Minimum Control Measures (MCMs). Table 3 is divided into 6 sub-tables, one for each of the 6 MCMs. Also included in the sub-tables below is an assessment of meeting each of the Measurable Goals (M.G.s) assigned to each BMP. The BMPs are taken from Appendix E of the City of Catoosa’s Stormwater Management Program (SWMP) document. Consult the SWMP for additional details about BMP implementation, responsible parties, implementation schedules, and procedures used to implement all BMPs.

Table 3: Assessment of BMPs and Measurable Goals

Table 3A- MCM 1- Public Education & Involvement

BMP ID #	MCM 1- BMP Description	Measurable Goal	M.G. Met?	M.G. Deficiencies	Appropriateness of BMP	Activities for Next Reporting Period
1	Display Board	Display information about meetings and pollution control	Yes		Display board updated regularly	Continue using display board & updating quarterly; include flyer for pollution event
2	Stormwater Presentation	Present to City Council Annually; receive public input	Yes	No public input at meeting	Presentation to City Council on 3/14/2021; no input from residents in attendance	Present to City Council one time
3	GCSA Website	Include link to GCSA website on City website	No	Link to website was not posted, but PDFs from GCSA website were		Link has been added to City website
4	IDDE Staff Training	Conduct training every 2 years	Yes	Training was not held but research into training was done; training will be held next year		Hold one staff training event over IDDE
5	Construction Site Staff Training and Education	Conduct training every 2 years	Yes		Construction site inspector attended training; brochures given to construction site operators when applying for permits	Hold one staff training over construction site inspections

BMP ID #	MCM 1 - BMP Description	Measurable Goal	M.G. Met?	M.G. Deficiencies	Appropriateness of BMP	Activities for Next Reporting Period
6	Good Housekeeping Staff Training	Train staff every other year	Yes	Training was not held but research into training was done; training will be held next year		Hold one staff training for Good Housekeeping and BMPs
7	Social Media/Brochures	25 brochures OR 1 social media post	Yes		3 Posts on social media regarding cleanup event; City is also starting Compass program to inform public about events/pollution control	Post one time on social media OR distribute 25 brochures to public about events and/or pollution control
8	Public Information Receipt	Track & respond to 100% of calls	Yes		One complaint received about trash from homeless camp; City cleaned up camp trash	Continue taking calls and keep list; respond to all calls
9	Pet Waste Stations	Install 3 stations	Yes		2 Stations installed at dog park, one at Blue Whale park	Maintain all stations
10	Distribute Giveaway Items	Distribute 25 items	Yes		Stormwater booth set up at multiple events	Distribute 25 items at community events
11	Household Pollutant Collection Event	Host one event annually	Yes		Event held in April	Hold one event

Table 3B- MCM 3- Illicit Discharge Detection & Elimination

BMP ID #	MCM 3- BMP Description	Measurable Goal	M.G. Met?	M.G. Deficiencies	Appropriateness of BMP	Activities for Next Reporting Period
1	IDDE Ordinance	Review annually	Yes		Annual review ensures compliance with OKR04	Review and update as needed
2	DWFS Program	Create outfall map and inspect annually	Yes		All outfalls mapped and inspected; will inspect 20%/year	Inspect 20% of all outfalls
3	MS4 System Map	Create map	Yes	City does not have much storm sewer- mostly open ditches	Outfall map created and will be updated annually/as needed	Review map and update as necessary
4	Debris Removal Program	Remove floatable trash/debris from MS4 waters	Yes		Areas of City driven every morning to check for trash; also removed on complaint-driven basis	Continue morning removal & as complaints are received
5	Non-Stormwater Discharges	List non-stormwater discharges	Yes	No illicit discharges		Continue listing non-stormwater discharges
6	Source Tracking Inspection & Enforcement Program	Track & remove within 72 hours	Yes	No illicit discharges		Continue program

Table 3C- MCM 4- Construction Site Stormwater Runoff Control

BMP ID #	MCM 4- BMP Description	Measurable Goal	M.G. Met?	M.G. Deficiencies	Appropriateness of BMP	Activities for Next Reporting Period
1	Construction Ordinance	Review annually	Yes		Annual review to ensure compliance with OKR04	Review & update as needed
2	Site Plan Review	Review site plans	Yes	Site plans do not currently include sediment & erosion control	Sediment & erosion control will be added to site plan reviews before end of permit; 92 site plans were submitted during the permit year. Current site plan review process does include stormwater drainage component.	Begin process of adding sediment & erosion control to site plan review (draft new section to include in review process)
3	Construction Site Inspection & Enforcement Program	Review sites quarterly	Yes		Frequent inspections ensure construction sites are following BMP requirements	Continue inspections
4	Construction Site Waste Control	Include during site review	Yes		Construction site inspections include waste control	Continue inspecting for waste control

Table 3D- MCM 5- Post-Construction Development & Redevelopment

BMP ID #	MCM 5- BMP Description	Measurable Goal	M.G. Met?	M.G. Deficiencies	Appropriateness of BMP	Activities for Next Reporting Period
1	Post-Construction Ordinance	Review	No	Ordinance does not currently include post-construction	Ordinance will be updated to include LID and post-construction requirements	Begin drafting amendment for ordinance
2	Operation & Maintenance Plan for Municipal BMPs	Review	No	Plan not currently in place; will be added to post-construction ordinance	Additional to ordinance will ensure long-term operation & maintenance of BMPs	Include in ordinance amendment (draft)
3	Standards to Direct Growth	Review	Yes		City is in process of creating a new comprehensive plan and will address standards for growth	Ensure this is included in new comprehensive plan
4	Assess Guidelines & Ordinances for LID Options	Begin reviewing ordinances and guidelines for hinderances to LID	Yes		All guidelines and ordinances will be reviewed and updated as needed by end of permit	Begin reviewing identified ordinances/guidelines

Table 3E- MCM 6- Pollution Prevention/Good Housekeeping for MS4 Operations

BMP ID #	MCM 6- BMP Description	Measurable Goal	M.G. Met?	M.G. Deficiencies	Appropriateness of BMP	Activities for Next Reporting Period
1	OKR05/OPDES Facilities	Review list annually	Yes		List created from online OKR05 permit map	Review/update list
2	Pollution Control	Review sediment & erosion measures	Yes	Currently no sediment & erosion control measures for line breaks; will be included in training moving forward	Trainings will reduce erosion & sedimentation following line breaks and repairs. There were approximately 16 water leaks during the permit year.	Include in training next year & ensure those making repairs are aware of processes
3	OKR04 Operations	Review list annually	Yes		One facility removed from list	Review/update list
4	Inspections & Maintenance Program	Inspect quarterly	No	Inspections were not done but will begin this year	Inspections will ensure MS4 facilities are following BMPs	Begin inspecting facilities
5	Flood Management Project Assessment	Review floodplain development requirements	Yes	Floodplain developments not currently reviewed for water quality issues	Water quality review will be added to current process. Site plan review process currently includes	Draft section to include that involves water quality

BMP ID #	MCM 6- BMP Description	Measurable Goal	M.G. Met?	M.G. Deficiencies	Appropriateness of BMP	Activities for Next Reporting Period
6	Contractor Requirements	Begin drafting affidavit	Yes		stormwater drainage components and will be updated to reflect quality in future.	Finalize affidavit
					Affidavit will be included in contractor paperwork to ensure stormwater control measures are followed	

IV. PROPOSED CHANGES TO SWMP AND BMPS FOR NEXT REPORTING CYCLE

The SWMP is currently being updated to reflect the 2021 OKR04 permit. No changes are anticipated from the above BMPs.

V. ADDITIONAL BMPS BEING IMPLEMENTED TO ADDRESS 303(D) WATERS

During this Annual Report period of record, the current 303(d) list for Oklahoma is dated 2020. The City of Catoosa has the following waterbodies within its MS4 listed as impaired on the 2020 303(d) list:

Table 4: 303(d) Listed Waterbodies within the MS4

Waterbody Name	Waterbody ID (WBID)	MS4 Percent	303(d) Pollutants of Concern
Bird Creek	OK121300010010_00	10%	Enterococcus (4a), Turbidity (5a)
Spunky Creek	OK121500020500_00	50%	Macroinvertebrate bio (5c), TDS (5b)

* Approximate percent of the 303(d)-watershed containing the MS4 area

The MS4 has installed pet waste stations at the City dog park as well as the park at the Blue Whale of Catoosa to combat the enterococcus concern. The City will also be including additional information for residents on social media and through their new Compass program to make them aware of the stations and concerns. The City will also look into brochures and other information outlining turbidity and ways to prevent it to provide construction site operators and inspectors with.

VI. ADDITIONAL BMPS BEING IMPLEMENTED TO COMPLY WITH TMDLS

The TMDL for Lower Bird Creek went into effect on June 1, 2022. The City of Catoosa has chosen Option 2 of Table IV-1 TMDL Implementation Schedule of the OKR04 permit. This option includes a TMDL pollutant baseline monitoring plan that must be in place within three years from the TMDL effective date. Because of this, the City will work throughout the next recording period to identify locations for monitoring and begin creating a monitoring plan and procedures. Currently, the City is adding pet waste stations to help curb the effects from pets in the area.

VII. AGREEMENT WITH ANOTHER GOVERNMENTAL ENTITY

The City of Catoosa is a member of INCOG’s Green County Stormwater Alliance (GCSA). INCOG provides a number of technical support services to its members, most of which are not actual permit requirements. The INCOG GCSA services that are considered City of Catoosa BMPs include:

1. Employee training workshops on all OKR04-required employee training topics;
2. Providing brochures that can be given to residents and construction site operators; and
3. Maintaining the GCSA regional website for all GCSA members