SWMP Overview and Template

GCSA Employee Training

Tulsa Mohawk Education Auditorium

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What Is the SWMP?

- "**S**torm**w**ater **M**anagement **P**rogram" (SWMP) document.

- A mandatory, written document showing every aspect of what will be done to meet all OKR04 permit requirements.

- Part IV focuses on SWMP contents; SWMP cited throughout.

- Must be completed at time of filing NOI.

- Can have attachments, appendices or make references to other supporting documents (e.g., a generic SWP3).

- Not a "door-stop". Meant to be used extensively.

- Central core of ODEQ's audit.

- Must be made available to the public.

SWMP For New & Existing Permittees

- Existing Permittees already have a completed SWMP.

  - ODEQ assumes that all BMPs are fully implemented.

  - By time of filing NOI, SWMP must be updated.

  - Permittees will have one year to implement changes.

- New Permittees must have a completed SWMP by time of filing NOI.

  - ODEQ assumes no BMPs to be implemented at startup.

  - Full implementation "*as soon as practicable, but no later than five (5) years from the effective date of this Permit.*"

Part IV.D SWMP Reviews & Updates

- Part IV.D.1: Must conduct an <u>annual review</u> of your SWMP in conjunction with preparation of your Annual Report.

- Part IV.D.2: SWMP must be <u>updated "*as needed*"</u>.

    a. Changes to <u>comply</u> with new requirements of this Permit.

    b. <u>Adding</u>: made at any time upon written notification to ODEQ.

    c. <u>Replacing</u>: an ineffective or infeasible BMP with 1 or more BMPs … at any time … deemed approved 60 days from written submittal … unless denied by ODEQ.

    d. All change requests must be submitted <u>in writing to ODEQ</u>.

Steps Needed to Replace BMPs

- Part IV.D.2.c: your <u>modification request</u> must include the following:

  1) An <u>analysis</u> *of why the BMP is ineffective or infeasible (including cost prohibitive).*

  2) <u>Expectations</u> *on the effectiveness of the replacement BMP.*

  3) An <u>analysis</u> *of why the replacement BMP is expected to achieve the goals of the BMP to be replaced.*

- Updates & changes to SWMP are "<u>*minor changes to SWMP*</u>" and "*not modifications to OKR04*".

If City Limits Expand

- **Part IV.E: Transfer of Ownership or Operational Authority.**

- *"Must implement the SWMP for all <u>new areas added</u> to your portion of the MS4…"* (e.g., annexations).

- Implement *"as expeditiously as practicable, but <u>no later than one year</u> from addition of the new areas."*

- Can be accomplished *"in a <u>phased manner</u> – to allow additional time for controls that cannot be implemented immediately."*

- Must have a *"<u>**plan**</u> for implementing your SWMP on all affected areas"* <u>within 90 days</u> of transfer of ownership…

- <u>Annual Report</u> must include *"information on all new annexed areas and any resulting updates required to the SWMP".*

Part IV.C: SWMP's Six MCMs

- Part IV is the core of OKR04 requirements for the SWMP.

- Part IV.C describes <u>requirements</u> and <u>recommendations</u> for each of the six MCMs.

- Part IV.C: "*You are <u>encouraged to consider </u>the information included in "Recommendations" and incorporate them as appropriate, but "<u>Recommendations" are not permit requirements</u>.*"

- Each MCM "*Requirement" begins with "you must <u>revise and update</u> your existing … program." "The revision of the program <u>shall be completed within the first year</u> after the effective date of this Permit.*"

SWMP Template for GCSA

- <u>2005 SWMP Template</u> for GCSA:

    - Developed by INCOG using EPA grant funds.

    - Brand new OKR04 – uncertain about many program elements.

    - Priorities and concepts matured over first 5 years.

    - 2005 template was verbose, with redundant parts.

    - Most municipal permittees in Oklahoma used some form of it.

- <u>2015 SWMP Template</u> for GCSA:

    - Goal is to update and streamline. Many new elements to add.

    - INCOG seeks ODEQ input on key issues.

    - Template target date for GCSA is by December 10th.

Changes To Be Made In 2005 SWMP

- Deleting redundant BMP tables embedded in text.

- Deleting Appendix of OKR04 text quotes.

- Major changes to tables of BMPs and Measurable Goals.

- Deleting Appendix of 1-page BMP sheets.

- Deleting the sampling flowchart Appendix.

- Streamlining text overall.

- Adding sections on addressing 303(d), TMDLs and species.

- Beefing up DWFS procedures.

- Adding much more on procedures per new OKR04.

Table of BMPs

TABLE ___: **BEST MANAGEMENT PRACTICES FOR THE SIX MINIMUM CONTROL MEASURES** Draft 3 – 2015-7-14

Permittee:	City of P2City

BEST MANAGEMENT PRACTICES (BMPs) TO ADDRESS MINIMUM CONTROL MEASURES	Must/ Recomm. *	INCOG/ GCSA **
IV.C.1. PUBLIC EDUCATION AND OUTREACH		
a. Distribute **brochures to homeowners**: household pollution control. *(Note 1)*	R	A, G
b. Distribute **brochures to retailers**: proper use and disposal of chemical products. *(Note 1)*	R	A, G
c. Distribute **brochures to restaurants**: proper disposal of wastes and chemicals. *(Note 1)*	R	A, G
d. Use **display board** with education materials at community events, meetings and city hall.	R	A
e. Distribute **give-away items** with GCSA logo for use with table-top display. *(Note 2)*	R	A, G
f. Place **street signs** about watershed protection at local stream crossings. *(Note 3)*		A
g. Print local / regional **newspaper articles** on urban water quality protection.		A, G
h. Run **video** on urban stormwater protection on local **cable access TV channel**.	R	A
i. Run local movie **theater advertisement** spot on urban water quality protection.		
j. Give **presentations to local organizations** on urban water quality protection.		A, G
k. Give **presentations to City Council** / County Commission on stormwater permit program.		A, G
l. Assist INCOG with updating **GCSA website** for public education and outreach.		G
m. Assist with local Blue Thumb **public school education** classroom outreach.		

Table of Measurable Goals

TABLE ___ : BEST MANAGEMENT PRACTICES, MEASURABLE GOALS AND IMPLEMENTATION SCHEDULES **1ˢᵗ Draft**

Permittee:

BMP MEASURABLE GOALS AND IMPLEMEN TATION SCHEDULES	Annual Measurable Goal	2015	2016	2017	2018	2019
IV.C.1. PUBLIC EDUCATION AND OUTREACH						
a. Distribute **brochures to homeowners**	50 each type	All year	All year	All year	All year	All year
b. Distribute **brochures to retailers**	25 each type	All year	All year	All year	All year	All year
c. Distribute **brochures to restaurants**	20 each type	All year	All year	All year	All year	All year
d. Use **display board** at meetings and city hall	1 mtg, 2 wks city hall	2ⁿᵈ	2ⁿᵈ	2ⁿᵈ	2ⁿᵈ	2ⁿᵈ
e. Distribute **give-away items**	100 items	All year	All year	All year	All year	All year
f. **Street signs** about watershed protection	2 new signs	Research	Install 2	Install 2	Install 2	Replace
g. **Newspaper articles** on urban water quality	1 article	3ʳᵈ	3ʳᵈ	3ʳᵈ	3ʳᵈ	3ʳᵈ
h. Run **video** on local **cable access TV channel**	1 video	2ⁿᵈ	2ⁿᵈ	2ⁿᵈ	2ⁿᵈ	2ⁿᵈ
i. Run **theater advertisement** spot	12 showings	2ⁿᵈ	2ⁿᵈ	2ⁿᵈ	2ⁿᵈ	2ⁿᵈ
j. Give **presentations to local organizations**	2 presentations	2ⁿᵈ	2ⁿᵈ	2ⁿᵈ	2ⁿᵈ	2ⁿᵈ
k. Give **presentations to City Council** / County Commission	1 presentation	4ᵗʰ	4ᵗʰ	4ᵗʰ	4ᵗʰ	4ᵗʰ
l. Update **GCSA website** for public education and outreach	INCOG as needed	All year	All year	All year	All year	All year
m. Blue Thumb **public school education** classroom outreach	2 events	1ˢᵗ	1ˢᵗ	1ˢᵗ	1ˢᵗ	1ˢᵗ
n. Co-host regional **workshop on LID** and water quality	1 workshop	1ˢᵗ	1ˢᵗ	1ˢᵗ	1ˢᵗ	1ˢᵗ
o.						
p.						

GreenCountryStormwaterAlliance
GiveCleanWateraHelpingHand

INCOG
Regional Partners - Regional Solutions

Thank you.
Any Questions ?

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Green Country Stormwater Alliance

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