

Written Procedure Requirements in OKR04

GCSA Employee Training

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Why Write It Down?

- There are significant benefits to having documentation about procedures:
 - Help in training existing staff.
 - Consistency in getting the job done a certain way.
 - Operational efficiency.
 - Identifying deficiencies and need for improvement.
 - Transferring knowledge to future operators.
 - Demonstrating professionalism.
- OKR04 and ODEQ offer flexibility in how you comply.

ODEQ & OKR04 Perspective

- Most procedure requirements and recommendations have always been in OKR04.
- So many that it was pointless to tease out the new from the old.
- GCSA Fact Sheet on Written Procedures – best summary.
- ODEQ Audits = major deficiency was lack of written plans, procedures and guidance.
- ODEQ recently said, *“If OKR04 says to have it in writing, then we will ask to see it.”*

The Basics

- See the GCSA Fact Sheet for a comprehensive summary.
- INCOG identified 43 references in OKR04 to have some type of written plan, procedures or guidance.
- Many references in OKR04 were indirect, such as:
 - “you need to document in your SWMP”,
 - “you must review and revise your ... program”, or
 - “develop, implement and enforce requirements for ...”
- Many only applied to certain circumstances, such as addressing 303(d), ARC, the 7th MCM, etc.

OKR04 Phrasing

- GCSA Fact Sheet took days to research and compile.
- Numerous word searches in OKR04:

Plan	Strategy
Procedure	Process
Method	Program
Assess	Document (verb)
Examine	Evaluate
Determine	

- **Two types:** Required vs Recommended.

Condensing It All Down

- **Two Other Types:**

- Requirement applies to **all** permittees, or
- Requirement only applies to certain **circumstances**.

- **Condensed “Circumstances” to 5 categories:**

- **303(d)** – “you must develop a plan”
- **ARC** – “an Emergency Response Plan must be included”
- **7th MCM** – “develop a supplemental BMP action plan”
- **New MS4 Areas** – “must have a plan for implementing your SWMP on all new affected areas”
- **ODEQ Action** – “DEQ will notify you... must document these actions in the SWMP.”

More Condensing of Types

- After looking over the nearly 4 dozen OKR04 citations for written procedures of some sort, INCOG distilled all of the various types of procedures into three broad categories:
 - Plans
 - SOPs
 - Guidance
- **Plans** – most formal and complex, such as spill response.
- **SOPs** – for repetitive tasks with many specific details.
- **Guidance** – least formal, can be memos, SWMP text, etc.

ODEQ Flexibility & INCOG Support

- ODEQ will be flexible: each MS4 can develop their procedures to suit local resources and conditions.
- Priorities and perspectives will shift over the coming years. Lessons learned...
- ODEQ will **not** be preparing templates or checklists.
- Share templates, drafts, concepts, ideas, strategies, and ask INCOG to address issues in GCSA workshops.
- Make progress – don't put off, start simple and work towards an ultimate goal.

SWMP Text vs Separate Document

- As INCOG prepared the 2015 SWMP Template, many written procedures were inserted to help GCSA members begin to build their written procedures.
- The SWMP Template goal was to have a starting point, from which separate written procedures will be prepared in the future, as needed.
- Why not just put all in the SWMP?
 - Can be done, that is one option.
 - But after a few years of adding text, the SWMP would become 100+ pages, unwieldy, and hard to use.

Benefits of Stand-Alone Documents

- Each can be prepared and updated independently of other documents.
- Easier to distribute, copy and use as handouts.
- SWMP can simply state: “refer to SOP for calibrating flow meter”.
- Can assign different staff to keeping each written procedure current.
- Can assign revision number and revision date to each written procedure **without having to revise the SWMP.**

How To Proceed

1. Organize your approach. Start with the big picture.
2. Identify high priority ones to do first.
3. Schedule the rest over the life of your 5-year permit.
4. Many “procedures” can be simple text inserted in the SWMP, or in-house emails or directives.
5. Don’t cram everything in the SWMP; use separate documents.
6. Seek outside resources: ODEQ, INCOG, internet.
7. Simple is best – stay focused on necessities only.

Keeping Your Procedures Current

- They need frequent attention and upkeep.
- USE THEM! Make notes in margins, use sticky tabs, keep track of needed changes, and update as needed.
- Employee training on procedures is required in OKR04; written procedures are essential for this.
- Show in each document the date of latest revision.
- Keep them organized, easy to locate, centralized.
- Best as electronic files for future editing and emailing.
- When in doubt, contact ODEQ. Also contact INCOG so that we can pass on new information to other GCSA members.

INCOG's GCSA Support

- Start with the December 2015 GCSA Fact Sheet.
- GCSA Employee Training workshops.
- Stormwater Management Program (SWMP) template.
- Standard Operating Procedures (SOP) template.
- Group and individual help with very formal documents:
 - Quality Assurance Project Plan (QAPP).
 - Spill Response and Prevention Plan (SRPP).
- Continuing GCSA education on resources and trends.

Thank you.

Any Questions ?



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