

**ANNUAL REPORT TO ODEQ
FOR PHASE II STORMWATER PERMITTED MS4s**

Rogers County

Name of Permitted MS4:	Rogers County
MS4 OKR04 Permit Number:	OKR040034
AR Reporting Period:	July 1, 2022- June 30, 2023
AR Original Completion Date:	October 16, 2023
AR Latest Revision Number:	0 (no revisions to original)
AR Latest Revision Date:	0 (no revisions to original)
AR Preparer Name and Title:	Brett Callahan, Stormwater Manager
MS4 Contact Name & Title:	Brett Callahan, Stormwater Manager
MS4 Contact Phone and Email:	(918) 923-4874, bcallahan@rogerscounty.org

EXECUTIVE SUMMARY

Rogers County 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 V.C of the "ODEQ General Permit for 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 Rogers County 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 V.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	Results of Information and Data Used for Assessments
V	Stormwater Activities Planned During the Next Reporting Cycle
VI	Proposed Changes to the SWMP or Best Management Practices (BMPs)
VII	Additional BMPs Being Implemented To Address 303(d) Waters
VIII	Additional BMPs Being Implemented To Comply With TMDLs
IX	Agreement With Another Governmental Entity
X	Progress Report For the 7 th MCM Construction Activities
XI	Information On All New Annexed Areas And Resulting SWMP Updates
XII	TMDL Implementation Reports, Status and Compliance Actions Taken
App. A	Letters of Commitment from Other Governmental Entities
App. B	Map of MS4 Boundary Changes During Reporting Cycle
App. C	TMDL Implementation Reports

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.

[Section 1 Break here]

I. CERTIFICATION STATEMENT:

The following certification statement is required by OKR04 Part VII.H.4. Requirements for who should sign the certification are specified in OKR04 Part VII.H. For municipalities, the certification must be signed by either 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

Stormwater Manager

10/18/2023

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 throughout the report.
Consultants, Organizations Used	Oklahoma Blue Thumb provided elementary school education and volunteer stream monitoring. Blue Thumb services are further discussed in the SWMP.
SWMP Review	SWMP was reviewed and updated based on the 2021 OKR04 permit requirements. SWMP will be reviewed and updated annually and/or as needed.
Changes Planned for Next Year	SWMP and BMPs were updated to reflect the 2021 permit changes and submitted to ODEQ in June of 2023. No changes are planned for the next reporting period.
TMDL Watersheds in MS4	There were no TMDL watersheds within the MS4 that were finalized and required MS4 actions during this AR cycle.
Aquatic Resources of Concern (ARC) for Protected Species in MS4	About 10% of the Verdigris River watershed is in the MS4 area. It is listed as ARC in Exhibit 1 of OKR04.
Outstanding Resource Waters (ORW) in MS4	There are no ORW waters within the MS4.

III. COMPLIANCE STATUS, BMP ASSESSMENT, AND ACHIEVEMENT PROGRESS: (Addresses OKR04 Part V.C.1.a)

The following is a summary of the assessment of the stormwater program for Rogers County. This assessment addresses the specific Annual Report requirements in OKR04 Part V.C.1.a. Because Part V.C.1.a has 4 separate items in a single paragraph, each needing detailed information, they were broken out as separate items in this AR. The 4 items are:

- Item 1: Status of compliance with permit conditions (Table 2);
- Item 2: Assessment of the appropriateness of the BMPs (Table 3);
- Item 3: Progress of achieving goal of reducing pollutant discharges to the MEP (Table 4); and
- Item 4: Progress towards achieving the Measurable Goals (Table 3).

Items 2 and 4 of Part V.C.1.a are assessed together in Table 3, presented as 6 sub-tables, one table for each of the 6 MCMs, because both Item 2 and Item 4 are BMP-specific. Item 2 refers to assessing the appropriateness of each BMP, whereas Item 4 assesses the Measurable Goal (M.G.) assigned to each BMP.

III. A Item 1 in OKR04 Part V.C.1.a: *"The status of your compliance with permit conditions..."*

The following list of Permit Conditions is taken from 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, plus the optional 7th MCM for local construction projects. 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.

Table 2: Status of Compliance with Permit Conditions

Permit Condition	Compliance Status	Future Actions Needed
Allowable Discharges	Reviewed list, no changes made.	Review annually or as needed.
Historic Preservation	No Section 106 Federal action 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	Rogers County is not co-permittee with another MS4.	No status change is expected.
Water Quality Standards (WQS)	The MS4 was not notified this report cycle of any WQS 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 report cycle.	MS4 will continue to implement enhanced BMPs to address 303(d) impairment.

Permit Condition	Compliance Status	Future Actions Needed
TMDL Compliance	There were no finalized TMDLs within the MS4 during this reporting cycle.	The MS4 will continue to request completed TMDL updates from ODEQ and seek assistance on compliance.
Outstanding Resource Waters (ORW)	The MS4 is not within an ORW watershed.	No status change is expected.
MCM-1: BMPs and Measurable Goals	The County was involved in the Home & Garden show and had great participation. The County utilized brochures/flyers during the reporting period.	The County is planning on utilizing social media with a monthly stormwater post. The County also hopes to be involved in more fairs & shows moving forward.
MCM-2: BMPs and Measurable Goals	Does not apply to Category 1 MS4.	Does not apply to Category 1 MS4.
MCM-3: BMPs and Measurable Goals	In compliance. One illicit discharge was detected and handled in a timely manner.	County will continue efforts. Additional IDDE requirements will be included in the new stormwater ordinance.
MCM-4: BMPs and Measurable Goals	County reviewed all site plans and contacted construction site operators through Homebuilders Association monthly meeting. No serious violations found.	County will be utilizing Citizen Portal to better track inspections and follow-up needed.
MCM-5: BMPs and Measurable Goals	County is currently drafting a new stormwater ordinance that will include incentives for utilizing LID. Currently no hinderances have been identified.	County will work to finalize a new stormwater ordinance during the next reporting cycle.
MCM-6: BMPs and Measurable Goals	No County-owned facilities are located in the urbanized area. Addendum is included in contractor paperwork requiring them to abide by stormwater requirements.	County plans to inspect County-owned facilities not in urbanized area after finalizing stormwater ordinance.
SWMP Updates	Updated based on 2021 OKR04 permit to be in compliance. Submitted in June of 2023 to ODEQ.	Reassess SWMP throughout year.
ODEQ Enforcement Actions Against MS4	None this reporting cycle.	No actions anticipated.
24 Hour Reporting of Pollution Events by MS4	No episodes to report this cycle.	Will report episodes as needed.

[Section 2 Break here)

- 111.B Item 2 in OKR04 Part V.C.1.a:** " ...an assessment of the appropriateness of the identified best management practices {BMPs/...}", and
Item 4 in OKR04 Part V.C.1.a: " ...and progress toward achieving the measurable goals for each of the MCMs."

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 A of the City of P2City'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 and Outreach

BMP ID#	MCM-1 BMP Description	Measurable Goal	M.G. Met?	Results	M.G. Deficiencies	Evaluate Appropriateness of the BMP
1-1	Use Display Board with educational materials at meetings and events	2 Fliers Quarterly	Yes	Fliers posted on display board made residents aware of activities such as cleanup day		Display board helps keep residents informed of current events and education efforts
1-2	Present to County Commission on Stormwater Permit Program and Receive Public Input	One Presentation to BOCC	Yes	Well received		Presentation allowed input from County Commissioners and public
1-3	GCSA Website for Public Education	Link on City website	Yes	Well received		Available any time for public to get answers to questions
1-4	Education program addressing IDDE	Distribute 25 brochures and/or post once on social media regarding IDDE	Yes		Brochures available at County Hall on request; number taken were not tracked. Due to Covid County does not have material in open but can be requested	Brochures available for any resident to learn more about illicit discharges
1-5	Construction Site Training	Assess GCSA Training	Yes	County presented at a monthly Homebuilders Association meeting over erosion & sediment control requirements.		Providing training and educational material to construction site operators ensures all operators have similar and most updated information.
1-6	Staff Training	Provide training to employees regarding IDDE and good housekeeping biennially	Yes	Staff attended various GCSA and OFMA trainings	Training does not reach all County employees	Training helps ensure employees are aware of what to look for for an illicit discharge and who to contact should they find one

BMP ID#	MCM-1 BMP Description	Measurable Goal	M.G. Met?	Results	M.G. Deficiencies	Evaluate Appropriateness of the BMP
1-7	Brochures/social media outreach	Provide brochures and assess possibility of using social media	Yes	Brochures provided at County Hall and cleanup days promoted on social media; will phase in more social media usage		Social media seems to be effective in making citizens aware of cleanup days- large turnout seen in recent years.
1-8	Public Information Receipt and Promotion	Number of calls/online reports	Yes	One illicit discharge report. County and ODEQ worked to resolve issue.		Reporting system allows citizens to be involved and report problems as they are found.
1-9	Education Program to Involve Local Developers	Assess use of GCSA trainings and brochures	Yes	County presented at a monthly Homebuilders Association meeting over erosion & sediment control requirements.		Providing trainings and educational material to local developers ensures all developers have similar and most updated information
1-10	Comply with state and local public notice requirements	Comply	Yes	In compliance		Notice requirements help ensure residents are aware of meetings/events
1-11	Make NOI/SWMP Available to public	Have material available at courthouse	No	Available at Courthouse; SWMP available on County website	NOI and Annual Report will be added once new IT employee is hired.	Having material easy to access will improve public involvement and awareness
1-12	Annual Cleanup Day	Hold one cleanup event each year	Yes	Cleanup event was well attended		Event had good turnout, allowed residents to be involved, & prevented

							excess debris/material/etc. from reaching MS4 system
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Table 3b: MCM-3. Illicit Discharge Detection and Elimination

BMP ID#	MCM-1 BMP Description	Measurable Goal	M.G. Met?	Results	M.G. Deficiencies	Evaluate Appropriateness of the BMP
3-1	IDDE Ordinance	Review and update annually	Yes	No changes are needed at this time. County is currently working on new stormwater ordinance that will have more requirements and guidance		Annual ordinance review ensures County is in compliance
3-2	Dry Weather Field Screening (DWFS) and MS4 System Map	Inspect 20% of outfalls	Yes	20% of outfalls inspected		Map and inspections help ensure County does not have any illicit discharges or cross connections
3-3	Non-Stormwater Discharges	List of and response to non-stormwater discharges	Yes	One illicit discharge found; County worked with ODEQ to resolve the issue in timely manner		List allows County to keep track of discharges and areas affected
3-4	Source Tracking Inspection & Enforcement Program	Number of illicit discharges identified	Yes	One illicit discharge found		List allows County to track illicit discharges and their response and ensure all are handled within 72 hours
3-5	Implement a Spill Response and Prevention Plan and deploy storm drain inlet at traffic accidents and pollution	Work with EM and Haz Mat Team	No	County has identified companies to assist in spill cleanup and will work with EM and Haz Mat Team as needed		Having spill response plan and companies identified helps speed up cleanup process and remove confusion.

Table 3c: MCM-4. Construction Site Stormwater Runoff Control

BMP Id.#	MCM-4 BMP Description	Measurable Goal	M.G. Met?	Results	M.G. Deficiencies	Evaluate Appropriateness of the BMP
4-1	Construction Ordinance	Review annually and update as needed	No	County is currently working on new stormwater ordinance.	Comprehensive plan hindered progress on ordinance but County plans to adopt ordinance during next reporting period.	Ordinance allows City to enforce various stormwater requirements.
4-2	Site Plan Review	Review site plan review material and update as needed; review and track all site plans	Yes	All plans are currently reviewed by public works staff and also FPA as needed.		Review of site plans before construction ensures all stormwater requirements are in place
4-3	Construction Site Inspection & Enforcement Program	Inspection sheets, findings	Yes	Inspection forms created and are being implemented. County is beginning to utilize software to track inspections and follow-up requirements.		Inspection sheets allow County to track inspections & repeat offenders
E	Develop requirements for construction site operators to implement sediment and erosion control measures and control waste at site	On-going	Yes	Current ordinance addresses this, but County will have more thorough requirements in new ordinance.		Sediment and erosion control measures being enforced at construction sites limit material entering MS4 system.

Table 3d: MCM-5. Post-Construction Management in New Development and Redevelopment

BMP ID#	MCM-5 BMP Description	Measurable Goal	M.G. Met?	Results	M.G. Deficiencies	Evaluate Appropriateness of the BMP
5-1	Review ordinance for post-construction runoff annually and update as needed	Review and update annually	No	Post-Construction will be addressed in new stormwater ordinance	Adoption of comprehensive plan hindered progress on stormwater ordinance.	Post-Construction ordinance will allow County to enforce measures as needed.
5-2	Operation & Maintenance Plan for Municipal BMPs	Review annually	Yes		County does not maintain detention ponds	
5-3	Standards to Direct Growth	Review current material	Yes	Comprehensive plan was finalized during reporting period		Directing growth away from sensitive waters helps protect waters and limit additional contaminants.
5-4	Assess Guidelines & Ordinances for LID Options	Begin reviewing guidelines	Yes	No hinderances thus far	Currently no LID/GI requirements	County is planning to include incentives for LID/GI in a new stormwater ordinance.

Table 3e: MCM-6. Pollution Prevention / Good Housekeeping For MS4 Operations

BMP Id.#	MCM-6 BMP Description	Measurable Goal	M.G. Met?	Results	M.G. Deficiencies	Evaluate Appropriateness of the BMP
6-1	Operation & Maintenance Program	Facilities inspected annually	No	Facilities visually inspected, no forms used currently.		No County owned facilities located in urbanized area. County plans to begin inspecting facilities outside of UA after the ordinance is adopted.
6-2	OKR05/OPDES Facilities	List in Year 1	Yes	List created		List allows County to ensure all facilities are inspected
6-3	Pollution Control	List of all water line breaks, repairs and actions taken; list of sediment & erosion controls used during maintenance and line breaks or repairs.	Yes	No line breaks		Keeping a list of breaks/repairs/actions allows County to track areas that are more susceptible to breaks and areas that need more checks.
6-4	OKR04 Operations	List of facilities in Year 1	Yes	List created		List allows County to ensure all facilities are inspected
6-5	Implement inspection program of all County Facilities' structural and nonstructural BMP's	Inspection form	Yes	No facilities within urbanized area	No facilities within urbanized area	County hopes to start inspecting facilities not in urbanized area to limit material entering streams.
6-6	Develop procedures for proper use, storage and disposal of chemicals at County facilities	Inspection form	Yes	No facilities within urbanized area	No facilities within urbanized area	County hopes to start inspecting facilities not in urbanized area to limit material entering streams.

BMP Id.#	MCM-6 BMP Description	Measurable Goal	M.G. Met?	Results	M.G. Deficiencies	Evaluate Appropriateness of the BMP
6-7	Display pollution prevention signs at county work areas	On-going	Yes	Signs displayed at all facilities		Signs provide information to public about pollution prevention
6-8	Ensure all contractors hired to perform maintenance on MS4 facilities are required to comply with BMPs	Draft section to add to contracts	No	Draft not created	Draft not created	This will ensure all contractors are aware of BMP requirements and adhere to them
6-9	Ensure that vehicle wash waters are not discharged into MS4 or Water of the State	Investigate wash bay at County barn in Year 1	No	Barn not investigated, is not within urbanized area.		Will ensure wash waters are not discharged into MS4