



**City of Bethany, Oklahoma
Annual Report Year Ending June 30, 2022
Permit Number OKR040007**

Prepared by: Brendan J. H. Summerville



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

September 15, 2021

Brendan Summerville, Community Development Associate
City of Bethany MS4
6700 NW 36th Street
Bethany, OK 73008

Re: Authorization for Stormwater Discharge from Phase II Small Municipal Separate Storm Sewer System (MS4), DEQ Authorization Number: OKR040007, Oklahoma County, Oklahoma

Dear Mr. Summerville:

The Notice of Intent for the City of Bethany was received on August 11, 2021 and processed by the Oklahoma Department of Environmental Quality (DEQ). Enclosed is an authorization allowing you to discharge stormwater from your MS4 located in **Oklahoma County** under the terms and conditions of the OPDES General Permit OKR04 for Phase II Small MS4 Discharges Within the State of Oklahoma.

Your authorization to discharge stormwater shall become effective on September 15, 2021 and expire at midnight on May 31, 2026. The application fee associated with this authorization has been paid. DEQ will send you an invoice regarding the applicable annual fee associated with this authorization. Please conduct an annual review of your SWMP, update it for necessary changes, and submit your annual report by **October 31, 2021**.

If you have any question regarding this authorization or the Stormwater Program, please call me at **(405) 702 - 8148** or email me at Magen.Kegley@deq.ok.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Magen Kegley", is written over a large, faint watermark of the Oklahoma State Seal. The seal features a central figure holding a scale and a sword, surrounded by stars and the text "THE GREAT SEAL OF THE STATE OF OKLAHOMA" and "1907".

Magen Kegley, Permit Writer
Municipal Discharge & Stormwater Permits Section
Water Quality Division

Enclosure

Oklahoma Department of Environmental Quality
Authorization to Discharge Stormwater under the OPDES General Permit OKR04
from Phase II Small Municipal Separate Storm Sewer System

Authorization No. OKR040007

In compliance with the Oklahoma Pollution Discharge Elimination System (OPDES) Act, 27A O.S. §2-6-201, the rules of the Department of Environmental Quality (DEQ), and in reliance on the certified statements and representations heretofore made in its application,

City of Bethany MS4
6700 NW 36th Street
Bethany, OK 73008

is authorized to discharge stormwater from a small municipal separate storm sewer system (MS4) located in Oklahoma County at the approximate geographical location: Latitude 35° 30' 26.5", Longitude -97° 37' 47.5".

The receiving bodies of water are the North Canadian River and Spring Creek. This facility discharges into a 303(d) listed stream.

The OPDES permit requires permittee to have a Stormwater Management Program (SWMP) which must include appropriate Best Management Practices (BMPs) addressing six minimum control measures to reduce discharge of pollutants in stormwater to the maximum extent practicable to protect water quality, with implementing BMPs, monitoring, and possible reporting requirements.

All applicable requirements of the Permit are subjected to DEQ's inspections and audits.

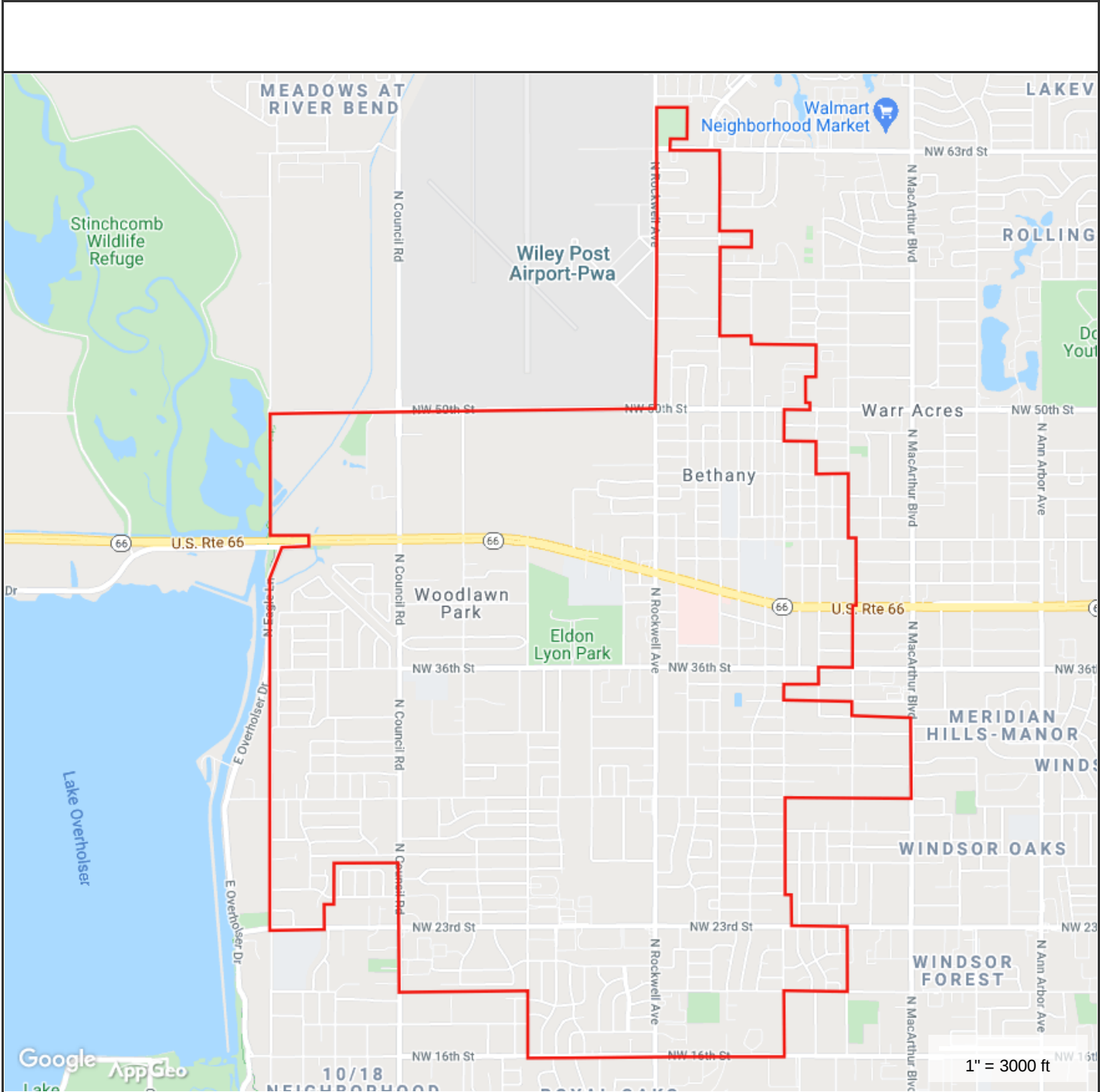
The SWMP must be available and implemented at your small MS4.

The authorization shall become effective September 15, 2021 and will expire at midnight May 31, 2026.

All terms and conditions of the OPDES Stormwater General Permit OKR04,
which become effective on June 1, 2021, shall apply to the recipient of this authorization.



Michael B Moe, P.E., Engineering Manager
Municipal Discharge and Stormwater Permits Section
Water Quality Division



**MAP FOR REFERENCE ONLY
NOT A LEGAL DOCUMENT**

Bethany, Oklahoma makes no claims and no warranties, expressed or implied, concerning the validity or accuracy of the GIS data presented on this map.

Print map scale is approximate. Critical layout or measurement activities should not be done using this resource.



During the reporting period of 1 July 2021 to 30 June 2022 there were four separate instances which are deserving of a closer analysis than this report would otherwise show. The City of Bethany in this time underwent a DEQ audit in April, an E. coli outbreak during June, extreme water rationing across the summer, and a GO Bond Election with marketing that ranged from June to August of 2022.

DEQ Audit

In February of 2022, we were notified by DEQ that our stormwater program was under review for concerns with our reporting and for additional insight as to the update of the program itself. During the audit, it became clear that the City of Bethany has fallen significantly behind in our reporting and by our own plan. While this is due in large part to the significant overturn of staff and leadership, it became apparent that a culture of negligence and poor communication between responsible parties had become the norm. Highlighting this were conditions found at the city's water treatment plant and the Public Works Department, where concerns with water quality, materials, and material storage were noted to be substandard. Furthermore, we were made aware of erosion control issues at two construction sites within the city limits.

Issues regarding the Physician's Choice Dialysis Center & the Bethany Village development have since been addressed and held under close supervision. Issues with the former (unsecured toilets) were addressed and corrected, and the facility has since become operational. The latter (Bethany Village) has continued to have failures with their silt fencing. In response to this, the City has made a concerted effort to monitor its construction more closely to ensure that potential and active issues are handled appropriately.

The noted issues with the water treatment facility and the public works department have yet to be fully corrected. Much of this is due to a severe dearth of staffing that has hindered our ability to act on multiple projects at any given time. However, it must be made clear that it is our goal to have as many these issues resolved as our budget allows before the end of the 2022-2023 reporting period. We believe this goal to be not only achievable, but paramount as we begin to finalize our new stormwater program.

E. Coli Outbreak

On the 28th of May 2022, the City of Bethany detected E. coli within our water supply within the Southern portion of the city. We worked closely with DEQ to ensure that proper testing was performed, and we continuously provided citizens with information to better provide an understanding of the situation. The situation was eventually isolated and then resolved, and the Water Department has been working on using this information for future use and training. The department's newfound knowledge was used a second time in June when another potential outbreak was detected, however, DEQ found no evidence of E. coli in their testing samples. The cause of the contamination has yet to be proven.

G.O. Bond Election

As part of a much-needed funding initiative, the City of Bethany began looking into the feasibility of a G.O. bond to accomplish many of our infrastructure goals and needs. Proposition 4 (Prop 4) was formed to begin a revision of our stormwater infrastructure to the tune of \$4,500,000 and was approved by a vote of our citizens. The sum of money, while significant to some degree, is a portion of the planned spending as the City of Bethany begins to map, revise, and renew our stormwater infrastructure. This bond initiative provided several opportunities in which city leadership and staff were able to interact with citizens regarding the current state of our stormwater program, its shortcomings, and its importance to a healthier environment in addition to its ability to reduce flooding. The feedback received and the educational aspect that was provided to the citizens is something on which we hope to build as we revise our stormwater management plan.



This is the City of Bethany's annual report for the year ending June 30, 2022 for our General Permit OKR04, Authorization Number OKR040007.

The ODEQ requires the use of six minimum control measures in the creation of stormwater management and pollution prevention programs. Our Stormwater Management Program addresses six "Minimum Control Measures" (MCMs). These are:

1. Public Education
2. Public Involvement
3. Illicit Discharge Detection and Elimination
4. Construction Runoff Management
5. Post-Construction Runoff Management
6. Municipal Good Housekeeping

Each of the minimum control measures uses a number of best managements of Best Management Practices (BMP) to help achieve our permit desire goals. Each Best Management Practice is described in tables across the following pages.

Overall, the City of Bethany has been successful in utilizing Best Management Practices regarding stormwater. The City of Bethany is currently in the process of drafting a new stormwater management plan (SWMP). It is the goal of the City to have this plan developed and written by the end of the current reporting cycle.



2022 BMP Tables

1) Public Education and Outreach

Public Works Staff presented annual

	BMP Activity	Target Audience	Frequency	Goal Met	Metrics	Keep BMP
1	Brochure: After the Storm at City Hall and Library Racks	General Public	50 copies stocked biannually	X	Of the 100 copies stocked, 43 were picked up.	X
2	Training WQ and Regs	City Staff	Annual	X	After the Storm video shown in May of 2022	X
3	Discuss Phase II Program in Public Meeting	General Public	At least once during permit cycle	X	2022 Bethany GO Bond Election - City Council Mtgs.	X
4	Events Sponsor & Participate	General Public	Annual	X	April 2022 - COSWA Rain Barrel Sale	X
5	Public Service Announcement local television or radio station (with COSWA)	OKC area listeners	Annual campaign	X	The city did not direct or create advertising, however, contributed to funding through membership dues..	X

2) Public Participation and Involvement

	BMP Activity	Target Audience	Frequency	Goal Met	Metrics	Keep BMP
6	Comply with State and Local Public Notice Requirements	General Public	All public meeting	X	The public is notified of all public meetings, SW included, in compliance with state regulations	X
7	Support Regional Agency	MS4 staff	One per permit cycle (COSWA)	X	Updated COSWA membership with dues being paid for 22-23 FY	X
8	Sponsor Big Trash Clean up	General Public	Biannual	X	498 tons - March 2022	X
9	Household Hazardous Waste Collection	General Public		X	Hazardous Household Waste disposal is available for Bethany residents at no charge, however, no event was hosted in his cycle.	X

10	Sponsor and participate in clean up events	General Public & City Staff	Annually	X	16 April 2022 - Keep Oklahoma Beautiful clean up event - 100-150 volunteers	X
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3) Discharge Detection and Elimination

	BMP Activity	Target Audience	Frequency	Goal Met	Metrics	Keep BMP
11	Brochure: Chemical storage at businesses	Business owners	Mail out annually with business license renewals	X	Renewals mailed in June 2022	X
12	Reporting process for incidents	Public works & Com. Dev.	Ongoing	X	7 SW incidents were sent through our report-a-concern program.	X
13	Training on how to conduct inspections	City Inspectors	Once per year		Staff is seeking qualification for SW inspections	X
14	Collect regional pollution data	City Staff	Ongoing	X	2 incidents of E.coli contamination	X
15	Inspections to track sources	City Staff or Inspectors	Annually dry weather field screening	X	1/2 of all infall & outfall sites were inspected.	X
16	Enforcement on abating sources	City Inspectors	Enforcements as necessary	X	Code Enforcement began abating properties after the end of the reporting cycle.	X

4) Construction Site Management

	BMP Activity	Target Audience	Frequency	Goal Met	Metrics	Keep BMP
17	Brochure: Construction Erosion Control BMPs	Developers, City crews, builders	Distribute to developers with building permit	X	16 brochures were taken from with permit applications	X
18	Inspections of active sites	City Inspectors	Once monthly during construction	X	93 inspections	X
19	Site plan review / WQ component	Developers, builders	Discuss erosion control with developers at review	X	10 site plan reviews	X

5) Post Construction Site Management

	BMP Activity	Target Audience	Frequency	Goal Met	Metrics	Keep BMP
20	Inspections of sites after building	Bldg. inspector	At least once after construction	X	9 Final Building Inspections	X
21	Review ordinances for barriers to LID	Community Dev. Dir.	Once during permit cycle			
22	Develop Schedule for LID Barrier Reduction	Community Dev. Dir.	Once during permit cycle			
23	Site Plan Review for Drainage & Landscaping	Community Dev. Dir	Once during permit cycle	X	10 site plan reviews were completed	X
24	Commercial Landscape Ordinance	Community Dev Dir	Once during permit cycle	X	Ordinance was enforced on each new dev.	X

6) Pollution Prevention and Municipal Good Housekeeping

	BMP Activity	Target Audience	Frequency	Goal Met	Metrics	Keep BMP
26	Training: Stormwater and City Activities (videos-IDDE & Raincheck)	Public Works	Annual		Videos not shown this reporting cycle. Currently planned for correction in Spring '23	X
27	Conduct MS4 inspections to track and clean out debris	Public Works	As necessary	X	Collector basins cleaned post rain events - no weight data.	X
28	Take appropriate enforcement action to abate sources	Code Enforcement & Inspection	As necessary	X	Code Enforcement began abating properties after the end of the FY2022 cycle	X
29	Create mechanism to receive info from public	General Public	Report-a-Concern feature added to website.	X	7 reports submitted due to flooding	X