

Acknowledgement

The Bethany Stormwater Management Program is Bethany's first line of defense for stormwater pollution prevention. This program performs routine inspections of probable pollution sources, coordinates enforcement & abatement efforts, public outreach & education, and aids in the collection of hazardous & bulk wastes. This program allows for the City of Bethany to remain in compliance with the Clean Water Act of 1972, as well as Best Management Practices (BMPs) per recommendations of the Environmental Protection Agency (EPA) and the Oklahoma Department of Environmental Quality (DEQ).

In April of 2022 and June of 2023, the City of Bethany underwent a DEQ Audit and Follow-Up Inspection, respectively. During these meetings, it was very clearly illustrated that the City's stormwater efforts had not met the standards put forth by the SWMP. These shortcomings are the result of staff turnover, budgetary constrictions, and a lack of cohesive operating procedures that had left the program in a state of disarray. Acknowledging these shortcomings, as well as meeting requirements for DEQ, was the impetus for the new SWMP which was submitted in July of 2023. Let it be acknowledged that the inspection standards put forth in the 2023 SWMP were not fully developed until the end of this permitting cycle. However, the city has made a concerted effort to address the concerns of DEQ for the 2022-2023 reporting cycle and will only continue to improve the program through the 2023-2024 cycle.

Program Overview

The City of Bethany covers an area of 5.23 square miles, and discharges stormwater into two bodies of water: The North Canadian River (OK520520000250_00), and Spring Creek (OK620910040170_00). The North Canadian River is a Category 5 waterbody on the 2022 303d list and is currently impaired for sulfate (5b). Spring Creek is a Category 3 waterbody on the 303d list. The efforts of the Bethany Stormwater Management Program have aided in the reduction of pollutants to these water bodies and maintains the city's compliance within its OKR04 Permit (OKR040007). The submission of the 2023 SWMP will allow for the continuation of compliance and seek to further reduce Bethany's impacts on these two water bodies.

The City of Bethany did not annex any territory during the 2022-2023 Reporting Cycle, and its borders will not change (*Appendix 1*). The City of Bethany relies only on one MS4 to complete its BMPs, which is the City of Oklahoma City, as Bethany utilizes their Hazardous Household Waste Program and Municipal Landfill for both daily and bulk waste pick-ups (*Appendix 2*).

Goals of the Stormwater Management Program

- Pollution reduction and elimination within built & natural environments.
- Monitor & control probable illicit discharges (spills, waste dumping, erosion, etc.) through inspections, ordinances, education, and active pollution reduction measures.
- Advise and direct municipal & private developers through plan review to develop in a manner that mitigates the increase of stormwater pollution and the subsequent impact on the city's stormwater infrastructure.
- Fulfill OKR04 Phase II permit conditions as set forth by the Stormwater Management Plan (SWMP), in particular the use of BMPs to have quantifiable pollution reduction measures.

2022-2023 Accomplishments

1. Completion of the 2023-2027 Stormwater Management Plan.
2. Developed new inspection and reporting methods across departments (implemented in 2023 plan). Including water testing measures.
3. Update of website and information accessibility.
4. Cleaned and repaired a municipal oil-water separator, at the request of DEQ.
5. Removed 896.99 tons of debris through two bulk waste removal events.
6. Successfully detected and ceased four stormwater incidents.
7. Successfully passed the city's first General Obligation Bond measures since 1994, in which over \$4 million will be allocated towards stormwater infrastructure.
8. Successful treatment and repairs of inflow & infiltration.

The accomplishments of the Stormwater Management Program in the 2022-2023 reporting cycle illustrate both the healthy evolution of the program and measurable, positive impacts on stormwater quality. With the 2023 SWMP, Bethany plans on furthering these accomplishments by detailing a more consistent and accurate system of pollutant monitoring and reporting. Additionally,

2023-2024 Goals

1. Formally begin water quality testing at MS4 discharge sites and other outfall locations.

2. Establish monthly checklists for all major MS4 facilities, with all information being consistent with the needs of the SWMP.
3. Create a database for monthly reports & inspections, as well as a list of all OKR10 projects.
4. Host additional clean-up days
 - a. Our goal is to reach out to DEQ's tire recycling program and establish a recurring event by 2025.
5. Continue preemptive measures to address pollution concerns at MS4 facilities.
 - a. These include drip trays under stored vehicles, appropriate chemical storage measures, and addressing DEQ's concerns of aggregate & other sandy material storage at municipal facilities.
6. Achieve "MS4 Stormwater Qualified" inspector training.
 - a. The course is scheduled for September 7, 2023.
7. *During this reporting cycle, city staff will formally request the addition of funds for GIS Mapping to be included in the 2024-2025 municipal budget. Acceptance will implement said mapping during the 2024-2025 reporting cycle.*

2023-2024 Program Schedule

July	Begin permit cycle – Restock brochures, re-order testing supplies.
August	Dry Weather Field Screening, Annual Report Due (1 Sept.)
September	Quarterly Water Test, OKR10 Site Inspections, MS4 Stormwater Qualified Certification.
October	Bulk Waste-Pick Up
November	Free Landfill Day – Winterization Social Media Campaign
December	Quarterly Water Test, OKR10 Site Inspections
January	Restock Brochures, Schedule Training (Public Works)
February	Dry Weather Field Screening, Spring SW Informational Guide.

March	Quarterly Water Test, OKR10 Site Inspections, Bulk-Waste Pick-Up, Promotional Campaign for Bethany Clean-Up Day & Rain Barrel Sale.
April	Rain Barrel Sale, Great American Clean-Up
May	Keep Oklahoma Beautiful joint meeting.
June	Quarterly Water Test, OKR10 Site Inspections, End Permit Cycle – Review Practices & Policies

2022-2023 BMPs

In the following section, the BMPs listed will be quantified and justified in their use, and their respective success and placement in the SWMP going forward will be discussed.

1. Education and Outreach

a. Brochures and Bookmarks

- i. Goal: Utilize brochures and bookmarks created by the EPA “After the Storm” in both English & Spanish. Both items are available in City Hall and the Bethany Library.
- ii. **Metric: 45 brochures (25 English & 20 Spanish) were distributed between the Bethany Library & City Hall, with 27 being taken (13 English & 14 Spanish). Brochures were restocked in July of 2022 and January of 2023.**
- iii. *This BMP will be kept going into the 2023-2024*

b. COSWA Radio Advertisements

- i. Goal: Dues from COSWA membership will be used for the ‘Everyday Environmentalist’ campaign.
- ii. **Metric: City of Bethany funds were not allocated for this campaign; thus, this BMP was not met.**
- iii. *This BMP will not be kept for the 2023-2024 reporting cycle, as the dues paid by the City of Bethany were not used for this campaign and are used outside of our jurisdictional scope.*

c. Website & Social Media

- i. Goal: Utilize the ability to provide near-instantaneous information to our citizens in a manner that keeps information up to date.

- ii. **Through Facebook, the city has been able to increase outreach and engagement concerning all topics city related. During the 2022-2023 cycle, our Facebook page had a 55.2% increase in reach 302,456 people.**
- iii. **Stormwater specific and BMP posts (Bethany Clean-Up Day & the Rain Barrel Sale) received 8,027 and 13,900 views respectively.**
 - 1. **The Rain Barrel Campaign began on February 7th and ended on March 14th.**
 - 2. **Bethany Clean-Up Day Campaign began March 16th and ended on April 13th.**
- iv. *This item will be kept for the 2023-2024 cycle, as it allows for a greater and more flexible dissemination of news to citizens.*

d. Newsletters

- i. **Goal:** Issued quarterly alongside water bills, the Bethany Bulletin has proven to be our most reliable source of stormwater & information for citizens without internet access. The bulletin is also available on the city website and social media platforms.
- ii. **Approximately 14,880 copies across 3 (August, December, April issues of the Bethany Bulletin were mailed during the 2022-2023 reporting cycle. Additionally, 7,228 accounts were reached via FB posts of the Bethany Bulletin as of the 30th of June 2023.**
- iii. *This item will be kept for the 2023-2024 reporting cycle, as it allows for news and information to reach residents without internet access.*

e. Public Discussions

- i. **Goal:** The stormwater management program will be discussed in at least one meeting per year, to educate citizens on the importance of stormwater quality, and the impact that everyday actions may have.
- ii. **The Stormwater Program was discussed during the 2022 G.O. Bond Public Forum, on August 9, 2022. Stormwater comprised Proposition 4, and garnered much public interest as stormwater infrastructure is a key concern.**
- iii. *This item will be kept for the 2023-2024 reporting cycle, as it provides an opportunity for stormwater to be brought to the public forum.*

f. Public Reporting

- i. Goal: Allow citizens to have a 24/7 reporting service that allows for all civic concerns to be easily reported. Stormwater issues are brought to the Stormwater Manager and Code Enforcement to address issues.
- ii. **A total of 2 Report-a-Concern calls involved the stormwater management program; both of which were identified and abated.**
 - 1. **7221 NW 23rd Street – Silt Fence Failure (Reported on May 4, 2023) with a Notice of Violation issued on May 5, 2023. Clean-up occurred between May 5th & 6th.**
 - 2. **6416 NW 39th Expressway– An oil spill was reported on May 15, 2023, at a closed tire shop, as barrels were leaking on site. A notice of violation was sent to the listed owner, and the city hired a private contractor for site abatement on May 17, 2023, at a cost of \$6,045, and was completed the same day.**
- iii. *This item will be kept for the 2023-2024 reporting cycle.*

2. Public Participation & Involvement

a. Annual Clean-Up Events

- i. Goal: The City of Bethany sponsors and hosts “Bethany Clean-Up Day,” on Earth Day to encourage citizens to clean up debris and trash.
- ii. **18 citizens volunteered for Bethany Clean-Up Day, and the event was held on Saturday, April 22, 2023.**
- iii. *This item will be kept for the 2023-2024 reporting cycle.*

b. Bulk Waste Pick-Up

- i. Goal: Host a biannual bulk-waste pick-up event, in which Public Works performs curbside pick-up to reduce the number and variety of potential stormwater contaminants and allow for proper disposal of waste.
- ii. **October 3-27, 2022: 535 tons of waste, at a cost of \$53,657.44**
- iii. **March 6-24, 2023: 361.99 tons of waste, at a cost of \$29,665.74**
- iv. *This item will be kept for the 2023-2024 reporting cycle.*

c. Household Hazardous Materials

- i. **Goal:** Provide the ability for Bethany residents to dispose of hazardous chemicals in a safe and non-polluting manner, thus keeping these chemicals out of Bethany waterways.

- ii. **The City of Bethany disposed of hazardous household waste, in conjunction with Oklahoma City, at a cost of \$13,000 across* the 2022-2023 reporting cycle.**

- 1. **The dollar amount reported is as of June 30, 2023. Citizens are free to dispose of hazardous waste at any date with a current Bethany water bill.*

- iii. *This item will be kept for the 2023-2024 reporting cycle.*

d. Support of Regional Agency

- i. Goal: Through financial and participatory means, the City of Bethany will support a regional agency to promote and educate the public regarding stormwater and stormwater pollution.

- ii. **In the 2022-2023 reporting cycle, the City of Bethany was a supporting member of COSWA and paid \$1,200 in membership dues in September of 2022.**

- iii. *This item will be kept for the 2023-2024 reporting cycle.*

e. Compliance with State & Public Notice Requirements

- i. Goals: In the event of a public meeting, it is the obligation of the city of Bethany to provide clear and reasonable public notice requirements to its citizens. This provides citizens with the opportunity to participate in public meetings.

- ii. **The meeting agenda for the August 9, 2022, G.O. Bond Public Forum was posted one week prior (August 2, 2022).**

- iii. *This item will be kept for the 2023-2024 reporting cycle.*

3. Discharge Detection & Elimination

a. Commercial Chemical Storage

- i. **Goal:** The city provides businesses with information (brochures from the EPA) regarding chemical storage and spill treatment. It is the intent of the city that this information will reduce the likelihood of poor chemical treatment, and subsequent spills & contamination.

- ii. **Metric:**

- iii. *This item will be kept for the 2023-2024 reporting cycle.*

b. Internal Reporting

- i. **Goal:** In addition to inspections, all departments have access to spill incident forms. These will be completed upon any chemical or hazardous material spill that requires immediate remediation. By documenting each incident, it is the goal of the city to identify problem areas & practices, and then act accordingly to prevent similar incidents.
- ii. **Metric: Three stormwater related incidents took place in Bethany during the 2022-2023 reporting cycle, with each item having a minor report accompany it; copies of these reports are attached.**
- iii. *This BMP will be retained for the 2023-2024 cycle and will receive significant changes. Including standardized forms for incidents, inspections, and monthly checklists for municipal facilities.*

c. Regional Pollution Data Collection

- i. **Goal:** Data will be maintained by the City of Bethany of potential and active pollutants from other MS4s (Oklahoma City & Warr Acres), as well as make available to its citizens through the city website. It is the intent of the city to have this as a precautionary measure in the event of a contaminating event.
- ii. **Metric: Data pulled from the 2022 lists of 303d Water Bodies & 2022 TMDLs. This data was made available to Bethany citizens on June 15, 2023.**
- iii. *This item will be kept for the 2023-2024 reporting cycle, however, data from water testing within the city's 303d waterways will also be made public when available.*

d. Enforcement/Abatement of Pollution Sources

- i. **Goal:** The goal of this BMP is to locate, identify, and correct potential stormwater contamination/pollution sources before they impact our waterways. Notices of Violation (NOV), tickets, and stop-work orders are within the jurisdictional scope of the Department of Community Development as it pertains to Stormwater.
- ii. **Metric: During the 2022-2023 Reporting Cycle, the City of Bethany performed 1 abatement, and enforced the stormwater ordinance on**

two noncompliant sites; please note that two of these sites were the result of the public report-a-concern line.

- 1. (Notice of Violation & Ticket) 7221 NW 23rd Street – Silt Fence Failure (Reported on May 4, 2023) with a Notice of Violation issued on May 5, 2023. Clean-up occurred between May 5th & 6th.**
 - 2. (Abatement) 6416 NW 39th Expressway– An oil spill was reported on May 15, 2023, at a closed tire shop, as barrels were leaking on site. A notice of violation was sent to the listed owner, and the city hired a private contractor for site abatement on May 17, 2023, at a cost of \$6,045, and was completed the same day.**
 - 3. (Notice of Violation) 4107 N Council Rd – The building site lacked appropriate erosion control devices and had begun driving silt into the public right-of-way & private property. Engineering staff successfully worked with the developer to install an erosion control channel. Completed on September 26, 2022.**
- iii. This item will be kept for the 2023-2024 reporting cycle and will be further strengthened by a standardized reporting form.*

4. Construction Site Management

a. Construction/Erosion/Waste Control

- i. Goal:** The City must maintain a list of active OKR10 sites with the goal of identifying probable or likely sources of pollution prior to a polluting event taking place.
- ii. Metric:** During the 2022-2023 Reporting Cycle, the City of Bethany has **two active** OKR10 sites as of June 30, 2023 (see sites listed below). This list was made available on the city website on June 15, 2023.
 - 1. Bethany Village – OKR1032021**
 - 2. Putnam City Transportation Facility – OKR1034142**

- iii. *This item will be kept for the 2023-2024 reporting cycle. A revised and condensed list will be added to the city website in place of the existing link.*

b. Inspection of Active Sites

- i. Goal: The Stormwater Manager or Building Inspector will conduct routine inspections of OKR10 grade sites to monitor their adherence to the agreed upon standards established within their respective OKR10 permit.

ii. Metric:

1. Bethany Village – OKR1032021

a. Site Grading Inspections took place on:

- i. March 6, 2023
- ii. March 22, 2023

2. Putnam City Transportation Facility – OKR1034142

a. Initial Site Visits – May 2023

- i. **Construction and further inspections in the 2023-2024 reporting cycle.**

- iii. *This item will be kept for the 2023-2024 reporting cycle. During the next reporting cycle, these inspections will be recorded on a quarterly basis, and through standardized forms. Per the recommendation of DEQ, these forms will be stored for future annual reports and audits.*

- c. **Site Plan Review** – Site plan reviews are conducted by the city engineering staff, who will make recommendations based on their review of the site plan.

- i. **Metric: Three site plans were approved during the 2022-2023 reporting cycle.**

**1. Overholser Elementary Traffic Loop – 7900 NW 36th Street
Approved: March 2023**

**2. Rooney Farms Farmer’s Market – 3823 N College Ave
a. Approved: March 2023**

**3. Putnam City Transportation Building Drainage Study – 7111
NW 42nd Street**

a. Approved: August 2022

- ii. *This item will be kept for the 2023-2024 reporting cycle, as it is required for all new commercial/industrial developments within city limits.*

5. Post Construction Site Management

a. Final Inspections of Sites

i. Goal: Final site inspections must take place prior to the issuance of a certificate of occupancy, and the termination of an OKR10 permit. A city inspector will perform a complete overview of the site to ensure that all stormwater controls, landscaping requirements, and the environmental condition set forth by the OKR10 Permit are met.

ii. **Metric: The City of Bethany performed 0 final site inspections of OKR10 sites during the 2022-2023 reporting cycle.**

1. ***This is due to none of the active OKR10 sites during the 2022-2023 reporting cycle being completed.***

iii. *This item will be kept for the 2023-2024 reporting cycle.*

b. LIDs – Low Impact Developments

i. Goal: Encourage, or require through ordinance, that low impact development practices be utilized in construction.

ii. **Metric: 0 true Low Impact Developments were constructed during the 2022-2023 cycle.**

1. **Approved site plans were required to utilize detention/retention ponds for stormwater runoff controls, however, no true LIDs were applied for, built, or approved.**

iii. *This item will be retained through the 2023-2024 reporting cycle, as more developments approach and its benefit to stormwater pollution reduction can be significant. However, the city will also begin reviewing the likelihood of an ordinance.*

c. Landscaping Ordinance/Review –

i. Goal: Require all new commercial construction to partially landscape their property to reduce stormwater runoff and promote beautification.

ii. **Metrics: The three site plans submitted were required to include landscaping in their designs.**

iii. *This item is a codified ordinance within the Bethany Municipal Code and will be retained for the 2023-2024 reporting cycle.*

6. Municipal Good Housekeeping

a. Dry Weather Field Screening

- i. Goal: Biannual inspections are performed of the city's infall & outfall locations, to identify issues with the physical nature of these sites, as well as identify pollutants within these channels.
- ii. **Metrics: Two Dry Weather Field Screenings were performed, with the first on September 28, 2022, and again on January 10, 2023. All 14 outfall and 4 infall locations were inspected. (Appendix 3).**
- iii. *This item will be kept for the 2023-2024 reporting cycle, and summaries of the reports will be posted on the city website for public education.*

b. Staff Training - The Stormwater Management Program has purchased two videos for the annual training of Public Works staff. This will be shown annually to Public Works staff.

- i. Goal: Provide educational materials for public works staff to best prepare workers to identify, report, and fix stormwater issues.
- ii. **Metrics: The training videos were not shown to employees during this reporting period.**
- iii. *This item will be kept for the 2023-2024 reporting cycle; however, new training materials procedures will be purchased, and training is scheduled for January of 2024.*

c. Bulk-Waste Drop-Off

- i. **Goal:** Offer a year-round service, for a fee, that allows residents to bring in bulk-waste items if they cannot be disposed of during the biannual free pick-up events.
- ii. **Metrics:** A total of 461 drop-offs were made by citizens to the Public Works yard during the 2022-2023 reporting cycle. This waste was transported to Oklahoma City landfills in addition to the city's normal physical waste.
- iii. *This item will be kept for the 2023-2024 reporting cycle.*

d. Debris Control

- i. **Goal:** The Bethany Public Works Authority will erect and maintain a system that captures debris from within the Public Works facilities.

- ii. **Metrics: Fencing was placed around roll off containers on the North end of Public Works in August of 2022. These fences are cleaned monthly of any debris.**
- iii. *This item will be kept for the 2023-2024 reporting cycle, as was done at the recommendation of DEQ.*

Stormwater Expenditures

During the 2022-2023 reporting cycle, the Bethany Stormwater Management Program collected approximately \$244,881.59 in stormwater fees, which amount to a monthly fee of \$3.00 on each water bill. This funding was distributed across staff time & resources, inflow & infiltration treatment, and BMPs across the city as they are needed. This is due in part to there not being a line item within the annual budget, but rather different departments needing access to funds to cover all aspects of the management program.

Staff Time & Resources covers the salaries and other associated costs of stormwater management. This program utilizes the time of the stormwater manager/city planner, the entirety of the Community Development Department, the time of Public Works directors and staff members, customer service, and the engineering department.

Inflow & infiltration treatment covers the approximate cost of treating contaminated water before it exits the MS4, as well as the immediate and necessary repairs to stormwater infrastructure caused by inflow and infiltration.

Program Element	Cost
<i>Hazardous Household Waste Disposal</i>	\$13,000.00
<i>Partnership</i>	
<i>Bulk-Waste Pick-Up</i>	\$83,000.00
<i>Abatements</i>	\$6,061.29
<i>COSWA Membership Dues</i>	\$1,200.00
<i>2023 Training Fees</i>	\$375.00
Sub Total	\$103,636.29
Staff Time & Resources	\$111,111.58
Inflow & Infiltration Treatment	\$179,000.00
Total Expenditures	\$393,747.87