Summary of Tulsa MS4 Permit

BACKGROUND:

Proposed: October 9, 1993
Finalized: August 26, 1994

Coverage: City of Tulsa

Does Tulsa agree with permit or will it be challenged?

- Tulsa is not expected to challenge the final permit.

- Tulsa, along with 27 other cities such as Dallas and Fort Worth, met on numerous occasions to discuss the development of NPDES permits for MS4s. The major issues of concern on the part of Tulsa were as follows:

  - Household Hazardous Waste (HHW) curbside pickup;
  - Sanitary sewer system overflows to the storm sewer system; and
  - Licensing of commercial pesticide applicators.

- The permit was modified during finalization to incorporate semi-annual HHW collection events plus development of a permanent collection program/location within 3 years.

- Requirements to prevent either dry-weather or wet-weather sanitary sewer overflows to the storm sewer system remain unchanged in the permit.

- Tulsa has a year from permit issuance to come up with a training program for city pesticide applicators and six months to require all commercial pesticide applicators to be licensed by the State of Oklahoma.

Are any minimum regulatory requirements missing?

- All the regulatory requirements (programmatic areas) appear to be addressed in the permit. In a number of instances, the permit language suggests that a number of program components are still in the development stage.

Does SWMP conform to regulations?

- Permit appears to conform and, in some instances, appears to go beyond minimum requirements.

Are there any cost estimates?

- Cost estimates prepared by Tulsa (Part 2 application) were estimated to be approximately $8.8M per year beginning FY94/95 escalating to $9.6M by the end of the permit term.

SUMMARY OF PERMIT REQUIRMENTS:

Structural Controls and Collection System:*:*

- Storm sewer system separated into two components; open channels & closed conduit system

  - Open channels -- routine maintenance to prevent sediment buildup and overgrowth of vegetation.

  - Sediment clean out of channels and detention basins(?) will occur at least once a year.

  - Conduct inspections for channel erosion.

  - UCS will include inspection of 2000 inlets annually and cleaned as necessary. Includes checking for cross-inspections. 10 miles of pipe cleaned a year.

New Development:

- Applicant will be required to adopt, by 2/1/95, a Storm Water Management Criteria Manual (Criteria) detailing the city's approach to storm water management associated with new development.

Roadways:

- Arterial streets swept 8 times per year, with emphasis on sweeping after deicing and sanding applications.

- Residential streets swept 4 times per year.

- Remove deicing and sanding materials from bridges as soon as feasible.

Flood Control:

- Eighteen major flood control structures will be assessed for retrofitting by 10/1/98.

- All future flood control projects will utilize design criteria from the Criteria Manual.

Pesticides, Herbicides, and Fertilizer Application:

- All city personnel and commercial entities engaged in the application of pesticides will be licensed according to the State's Pesticide Application Law.

- Provide bi-annual educational information on pesticide and fertilizer usage.

Illicit Discharges/Improper Discharges:

- Watershed Development Regulations allow for inspections at construction sites of connections to storm sewer system.

- Solid Waste Disposal and Containment ordinance prohibits the illegal dumping of materials into the storm drain, violators can be assessed fines.

- Prohibition of unpermitted wet-weather or dry-weather sanitary sewer overflows to the storm sewer system. Storm sewer rehabilitation program includes 53K feet of conduit cleaning, videotaping 21K of pipe with TV camera, and system repairs at 100 locations.

- By 5/1/95, the city must have a floatables control program that includes two floatables monitoring locations.

- Household hazardous waste (HHW) and used-oil collection program:

    - Household hazardous wastes collected at least 2 times per year until 8/1/97. After that, the program must be expanded to include opportunities for more frequent/permanent municipal and/or private "drop off" locations.

- Field screening program will include monthly stream monitoring. In-stream samples will be lab analyzed from 16 water quality sampling points. Program will include a hotline for reporting suspected illicit connections and illegal dumping.

Additional Program Elements:

- Spill Prevention and Response program establishes -- Tulsa Area Emergency Management Agency (TAEMA) coordinates all emergency hazwaste spill response including those to the storm sewer system.

- Inspection of all closed and operating landfills, TSDs and SARA 313 facilities once per permit term.

- Monitoring results of all facilities within the industrial inventory (NPDES storm water permitted facilities only) will submit copies of DMRs to the city annually.

- Construction sites required to submit a NOI to be covered by an NPDES storm water general permit must submit copy to city. E&S controls must comply with Stormwater Management Criteria Manual.

- Public education program that addresses illicit connections, procedures to properly handle and dispose of HHWs, conduct public outreach seminars and publish bi-annual report on pesticide and herbicide usage.

Monitoring Requirements

- Chemical-specific monitoring is required:

  - 5 outfalls
  - Once during each season (3)

- Alternatively, rapid bioassessment option may be substituted during years 2, 3, and 5 for chemical-specific monitoring. Years 1 and 4 remain unchanged.

  - RBP option requires bioassessment monitoring in two waterbodies with at least one reference site from the same ecoregion. Monitoring must be performed twice a year. A proposal to perform RBP must be submitted within the first year of the permit.

- Representative storm event characteristics are the same as EPA's criteria. Permit does provide waivers from the criteria under justifiable circumstances.

- Seasonal loadings estimates are to be based on seasonal wet-weather monitoring results.

- Floatables monitoring at two locations. Tulsa is required to estimate the amount of floatable materials removed by floatables control devices.