

**2021 Annual Report
OPDES Permit OKR04**



OKLAHOMA
Turnpike Authority

SIGNATURE OF RESPONSIBLE OFFICIAL

Oklahoma Turnpike Authority

“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.”

Darian L. Butler

Darian Butler, P.E.
Director of Engineering
March 11, 2021

Executive Summary

The Oklahoma Turnpike Authority (OTA) has prepared this 2020 Annual Report to meet the requirement of Part V.C of General Permit OKR04 issued by the ODEQ for Phase II Municipal Separate Storm Sewer System (MS4) discharges within the State of Oklahoma.

This Report addresses progress made on implementing the six Minimum Control Measures (MCMs) as contained in OTA’s Storm Water Management Plan (SWMP) which was revised in October, 2016. The report addresses progress made during the following permit period:

January 1, 2020 to December 31, 2020

Each MCM has a number of Best Management Practices (BMPs) that constitute the core activities pertaining to each MCM.

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ANNUAL REPORT: PHASE II STORM WATER MANAGEMENT PROGRAM

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I. Overview of OTA's Stormwater Program

Contact Information

The following is the stormwater contact information for OTA:

Oklahoma Turnpike Authority
P.O. Box 11357
Oklahoma City, OK 73136
Contact Person: James Pruett
Telephone Number 405-425-7449

Overview of OTA's SWMP

The OTA operates 640 miles of roadway in both urban and rural areas. Approximately 139 miles of OTA roadways are within small MS4 boundaries. The OTA applied to renew the OKR04 permit on January 29, 2016. The new permit was received on January 18, 2017. OTA is in the process of designing or constructing three new turnpike segments; however, none of the new segments impact any Phase II MS4s.

The OTA completed a major revision of the SWMP in October 2016. Any reference to BMP numbers in the remainder of this report refers to the BMPs included in the October 2016 revision.

II. Status of Compliance with Permit Conditions/Assessment of Appropriateness/Progress Toward Reducing Pollutants to MEP/Progress Towards Measurable Goals

OTA submitted the first annual report under the new OKR04 permit on February 23, 2017. All subsequent annual reports were submitted by March 1 of each year as required. The OTA is not subject to requirements of any TMDLs. The OTA is in compliance with the new OKR04 permit conditions.

OTA continued the use of web-based stormwater training that was started in 2017. A web based program was presented to OTA staff in calendar year 2018. For calendar year 2020 a revised web based training program was offered to maintenance staff.

This was also the third year of OTA's "Environmental Programs" section on the OTA website. OTA added an EPA guidance document to the website in 2018 and will post additional information to the website in 2020.

Progress Toward Achieving Measurable Goals for each of the Six Minimum Control Measures

Minimum Control Measure	Relevant BMP#/Title	Assessment of Appropriateness (Explain if not Appropriate)	Progress Towards Reducing Discharge of Pollutants	Progress Towards Measurable Goals	
Public Education and Outreach	1	Brochure for Water Quality Impacts	Yes	Educates the public in ways to reduce pollutants in stormwater	EPA guidance on highway runoff posted on the Environmental section of OTA's website on 12/28/18.
	10	Prepare Annual Report for DEQ	Yes	N/A	Measurable goals have been met
	11	Stormwater Section on OTA's Website	Yes	Provides information that can have an indirect impact of discharge of pollutants	The Stormwater Management page is reviewed periodically and updated as needed.
	12	Clean-up Events and Litter Programs.	Yes	Helps control accumulation of solid waste on OTA property	Trash is picked up regularly and notices are sent to those observed to be littering.
Public Participation and Involvement	1	Brochure for Water Quality Impacts	Yes	Educates the public in ways to reduce pollutants in stormwater	EPA guidance on highway runoff posted on the Environmental section of OTA's website on 12/28/18.
	8	Toll Free Telephone Number	Yes	Helps alert OTA to problem locations	OTA has established separate toll free numbers for stormwater and litter inquiries.
	10	Prepare Annual Reports for DEQ	Yes	N/A	Measurable goals have been met
	11	Stormwater Section on OTA's Website	Yes	Provides information which can have an indirect impact of discharge of pollutants	The Stormwater Management page is reviewed periodically and updated as needed.

Minimum Control Measure	Relevant BMP#/Title		Assessment of Appropriateness (Explain if not Appropriate)	Progress Towards Reducing Discharge of Pollutants	Progress Towards Measurable Goals
Illicit Discharge Detection and Elimination	1	Brochure for Water Quality Impacts	Yes	Educates the public in ways to reduce pollutants in stormwater	EPA guidance on highway runoff posted on the Environmental section of OTA's website on 12/28/18.
	2	Policy for Chemical Storage and Disposal	Yes	Helps control release of chemicals	Policy was reviewed in June and will be continued for 2020.
	3	Training Module for Maintenance Activities	Yes	Educates employees in ways to reduce pollutants in stormwater	Web-based training titled "MS4 Permits and OTA" is being revised to reflect current information.
	4	Training Module for Stormwater Regulations	Yes	Educates employees in ways to reduce pollutants in stormwater	Four OTA staff attended Oklahoma City's Construction Workshop on October 3, 2019
	6	Develop OTA System Maps	Yes	N/A	Maps are reviewed as needed.
	8	Toll Free Telephone Number	Yes	Helps alert OTA to problem locations	OTA has established separate toll free numbers for stormwater and litter inquiries.
	9	Spill Prevention/Clean-up Policy and Procedure	Yes	Helps control release of chemicals	Policy was reviewed in June and will be continued for 2020.
	10	Prepare Annual Reports for DEQ	Yes	N/A	Measurable goals have been met
	12	Clean-up Events and Litter Program	Yes	Reduces solid waste on OTA right-of-way	Trash is picked up regularly and notices are sent to those observed to be littering.
	13	Storm System Conveyance Inspections	Yes	Helps control discharges of suspended solids	Approximately 50% of all conveyance structures are inspected each year.

Minimum Control Measure	Relevant BMP#/Title		Assessment of Appropriateness (Explain if not Appropriate)	Progress Towards Reducing Discharge of Pollutants	Progress Towards Measurable Goals
	14	Inspections to Detect Illicit Discharge/Enforcement Actions	Yes	Helps control release of chemicals	OTA's Illicit Discharge Investigation Policy requires Maintenance to inspect outfalls on roadways and at Maintenance facilities.
Construction Site Stormwater Runoff Control	4	Training Module for Stormwater Regulations	Yes	Educates employees in ways to reduce pollutants in stormwater	Four OTA staff attended Oklahoma City's Construction Workshop on October 3, 2019.
	7	Highway Design Pollution Prevention Practices	Yes	Helps control discharges of suspended solids and other particulates.	OTA's Standard Specification for Stormwater Pollution Control is in effect for all highway projects.
	10	Prepare Annual Reports for DEQ	Yes	N/A	Measurable goals have been met
	15	Inspection Program for Erosion and Sediment Control	Yes	Helps control discharges of suspended solids	Both contractors and OTA on-site representatives conduct inspections of stormwater BMPs.
	17	Policies and Practices for Erosion and Sediment Control	Yes	Helps control discharges of suspended solids	Measurable goals have been met
	18	Site Plan Review for Erosion and Sediment Control	Yes	Helps control discharges of suspended solids	Measurable goals have been met
Post-Construction Runoff Control	7	Highway Design Pollution Prevention Practices	Yes	Helps control discharges of suspended solids and other particulates.	OTA's Standard Specification for Stormwater Pollution Control is in effect for all highway projects.
	10	Prepare Annual Reports for DEQ	Yes	N/A	Measurable goals have been met
	13	Storm System Conveyance Inspections	Yes	Helps control discharges of suspended solids	Approximately 50% of all conveyance structures are inspected each year.

Minimum Control Measure	Relevant BMP#/Title		Assessment of Appropriateness (Explain if not Appropriate)	Progress Towards Reducing Discharge of Pollutants	Progress Towards Measurable Goals
	15	Inspection Program for Erosion and Sediment Control	Yes	Helps control discharges of suspended solids	Both contractors and OTA on-site representatives conduct inspections of stormwater BMPs.
	16	SWPPP for OTA Maintenance Facilities	Yes	Helps control release of sand, salt, and chemicals	SWPPPs were reviewed and revised in June and July as needed. Pilot project needs to be completed by the end of 2020.
Pollution Prevention/ Good Housekeeping	2	Policy for Chemical Storage and Disposal	Yes	Helps control release of chemicals	Policy was reviewed in June and will be continued for 2020.
	3	Training Module for Maintenance Activities	Yes	Educates employees in ways to reduce pollutants in stormwater	Web-based training titled "MS4 Permits and OTA" is being revised to reflect current information.
	4	Training Module for Stormwater Regulations	Yes	Educates employees in ways to reduce pollutants in stormwater	Four OTA staff attended Oklahoma City's Construction Workshop on October 3, 2019.
	5	Training Module for Pesticides	Yes	Educates employees in ways to reduce discharge of herbicides in stormwater	Measurable goals have been met
	9	Spill Prevention/Clean-up Policy and Procedure	Yes	Helps control release of chemicals	Policy was reviewed in June and will be continued for 2020.
	10	Prepare Annual Reports for DEQ	Yes	N/A	Measurable goals have been met
	11	Stormwater Section on OTA's Website	Yes	Provides information which has an indirect impact of discharge of pollutants	The Stormwater Management page is reviewed periodically and updated as needed.

Minimum Control Measure	Relevant BMP#/Title		Assessment of Appropriateness (Explain if not Appropriate)	Progress Towards Reducing Discharge of Pollutants	Progress Towards Measurable Goals
Pollution Prevention/ Good Housekeeping	12	Clean-up Events and Litter Program	Yes	Reduces solid waste on OTA right-of-way	Trash is picked up regularly and notices are sent to those observed to be littering.
	13	Storm System Conveyance Inspections	Yes	Helps control discharges of suspended solids	Approximately 50% of all conveyance structures are inspected each year.
	14	Inspections to Detect Illicit Discharge/Enforcement Actions	Yes	Helps control release of chemicals	OTA's Illicit Discharge Investigation Policy requires Maintenance to inspect outfalls on roadways and at Maintenance facilities.
	15	Inspection Program for Erosion and Sediment Control	Yes	Helps control discharges of suspended solids	Both contractors and OTA on-site representatives conduct inspections of stormwater BMPs.
	16	SWPPP for OTA Maintenance Facilities	Yes	Helps control release of sand, salt, and chemicals	SWPPPs were reviewed and revised in June and July as needed. Pilot project needs to be completed by the end of 2020.
	17	Policies and Practices for Erosion and Sediment Control	Yes	Helps control discharges of suspended solids	Measureable goals have been met

III. Proposed Changes to BMPs and Stormwater Activities Planned During the Next Reporting Cycle

The following table shows changes made to BMPs since the 2018 Annual Report as well as stormwater activities planned for 2020. All BMPs will be reevaluated for the 2020 Annual Report. For the most part, the stormwater activities planned for 2020 are the BMPs noted in Part II.

BMP	Changes Made since the 2018 Annual Report	Stormwater Activities Planned for 2020
1. Brochure for Water Quality Impacts	None	Post new brochure, bookmark, or information sheet.
2. Policy for Chemical Storage and Disposal	None	Follow BMP and review policy
3. Training Module for Maintenance Activates	None	Produce a new web-based training class
4. Training Module for Stormwater Regulations	None	Follow BMP - External training will be utilized for this purpose when available
5. Training Module for Pesticides	None	Follow BMP
6. Develop OTA System Maps	None	Follow BMP
7. Highway Design Pollution Prevention Practices	None	Follow BMP
8. Toll Free Telephone Number	None	Follow BMP
9. Spill Prevention/Clean-up Policy and Procedure	None	Follow BMP and review policy
10. Prepare Annual Reports for DEQ	None	Follow BMP (will submit next year's report by March 1, 2021)
11. Stormwater Section on OTA's Website	None	Follow BMP + continue to expand and update the stormwater section on website
12. Clean-up Events and Litter Program	None	Follow BMP
13. Storm System Conveyance Inspection	None	Follow BMP and implement annual Maintenance inspection report
14. Inspections to Detect Illicit Discharge/Enforcement Actions	None	Follow BMP, review policy, and implement annual Maintenance inspection report
15. Inspection Program for Erosion and Sediment Control	None	Follow BMP
16. SWPPP for OTA Maintenance Facilities	None	Consider low impact development BMP for a Maintenance yard
17. Policies and Practices for Erosion and Sediment Control	None	Follow BMP
18. Site Plan Review for Erosion and Sediment	None	Follow BMP

BMP	Changes Made since the 2018 Annual Report	Stormwater Activities Planned for 2020
Control		

IV. RESULTS OF INFORMATION COLLECTED AND ANALYZED/PROPOSED CHANGES DUE TO 303(D) OR TMDL REQUIREMENTS

No information has been collected since the October 2016 revision that would impact any aspect of OTA's SWMP.

Information Collected	Impact on SWMP or Reduction of Pollutants to SWMP	Proposed Changes to Reduce Discharges of Pollutants to 303(d) Waters	Proposed Changes to Comply with TMDLs
None	N/A	N/A	N/A